Public Service Commission of Wisconsin

Phil Montgomery, Chairperson
Eric Callisto, Commissioner
Ellen Nowak, Commissioner

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January 24, 2013

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of:

Developing an Unified Intercarrier Compensation Regime	CC Docket No. 01-92
Establishing Just and Reasonable Rates for Local Exchange Carriers	WC Docket No. 07-135
Call Routing and Termination	

Dear Chairman Genachowski:

On September 14, 2011, the Public Service Commission of Wisconsin (PSCW) sent a letter to the Investigations and Hearings Division of the Federal Communications Commission's (FCC) Enforcement Bureau. The letter addressed call termination issues being experienced around the country, especially in the service territories of rural local exchange carriers (RLECs). The PSCW noted that these call termination issues have a negative effect on the economy and frustrate the providers and their customers in many rural locations. We encouraged the FCC "to quickly investigate these issues and to develop responses to this growing problem."

The PSCW, like other state commissions[1] and many rural providers, was thus encouraged when the FCC issued its February 6, 2012, Declaratory Ruling on Rural Call Completion Issues (CC Docket No. 01-92 and WC Docket No. 07-135). We understand that this is an issue on which it is hard to pin-point exact causes and specific violations of less-than-diligent providers. We believe the FCC's Declaratory Ruling on these issues was a step in the right direction, and the PSCW commends the FCC for its efforts in trying to resolve the problems of rural call termination.

However, the issue persists. These problems are of pressing concern to Wisconsin's RLECs, businesses and residents. All are suffering real harm, both fiscal and non-fiscal, by calls that cannot be completed or that have such low quality that communication is impossible. The FCC has been investigating call termination problems for many months and has developed online portals for consumers and providers to report problems. We join others who have urged the FCC to release a summary of the investigation and the information gathered so far, so that all may gain a better understanding of the extent of the problem.

Over the past year, the National Exchange Carrier Association (NECA) has twice studied this issue, and both studies showed that the problem is significant. Wisconsin RLECs have also studied this issue and found similar levels of problem calls as was found in the NECA studies. In examples from several RLECs, customers have reported, and the RLECs have tracked, calls that failed to complete, messages

[1] Individually or through the National Association of Regulatory Utility Commissioners (NARUC).

that were delayed, calls that had poor voice quality, FAX calls that could not be transmitted, calls that lacked correct caller ID information, or calls that simply never connected.

Many Wisconsin RLECs have already undertaken considerable measures to try and solve this problem. They have upgraded their facilities, diversified into data and video provisioning, and have developed viable business plans despite serving high-cost areas. Call termination issues, however, threaten those efforts. No matter how high quality the bundle of services provided, voice service remains a core requirement for many rural families and businesses. When that voice service does not work and results in financial harm to customers, whether the fault lies with the RLECs or not, those customers seek other provider options.

In attempting to comprehend the call termination issue, Wisconsin RLECs have traced call routes and have seen numerous examples of what would appear to be highly inefficient routing. Such complex routing introduces delay and results in poor call quality. In many cases, the RLECs have found that a large number of transport providers appear in the long and complex route. In one case, a call from southern Wisconsin to northwest Wisconsin was actually routed to Europe and Singapore before returning to Wisconsin.

We appreciate your attention to this matter. Consumers and businesses in rural Wisconsin have endured these problems for far too long, and it is essential that they be corrected. While continued FCC promotion of industry best practices is appropriate and clearly needed, more specific and focused action is needed now to remedy problems, identify and sanction poor performers, restore quality service in rural areas and preserve the integrity of the communications network. Many providers; NECA and its members; and NARUC and its members, including the PSCW, are willing to assist in continuing efforts to make progress on resolving this critical issue. We respectfully request that you keep this matter "on the front burner" and move quickly to help improve service to rural consumers and businesses.

Sincerely,

P. L. Montgomery   E J Callisto   Ellen E. Nowak

Phil Montgomery
Chairman

Eric Callisto
Commissioner

Ellen Nowak
Commissioner

cc: The Honorable Robert M. McDowell, Commissioner, FCC
The Honorable Mignon Clyburn, Commissioner, FCC
The Honorable Jessica Rosenworcel, Commissioner, FCC
The Honorable Ajit Pai, Commissioner, FCC
Ms. Theresa Cavanaugh, FCC Investigations and Hearings Division
Ms. Margaret Dailey, FCC Investigations and Hearings Division