

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of: )

WC Docket No. 13-39 )

Rural Call Completion )

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**COMMENTS OF THE VOICE ON THE NET COALITION**

The Voice on the Net Coalition (“VON”)<sup>1</sup> respectfully files these comments in response to the Commission’s Second Further Notice of Proposed Rulemaking (“FNPRM”) in the above-captioned proceeding.<sup>2</sup>

**Reporting requirements.** VON supports the Commission’s proposal to eliminate the recording, retention and reporting requirements for covered providers.<sup>3</sup> As discussed in the 2017 Rural Call Completion Data Report, the Wireline Competition Bureau has suggested that even with modification to the current reporting requirements, “it is not clear that the benefits of such modifications would outweigh the costs.”<sup>4</sup> There is no evidence that these reports have actually improved call completion rates to rural areas. The Commission itself questions the reliability of the data collected.<sup>5</sup> On the other hand, it’s both expensive and time-consuming to collect the data and prepare the reports. One VON member estimates that it costs approximately \$32,000 per year (including computer expenses) and takes about 32-40 hours per year to gather the information and compile the quarterly report.

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<sup>1</sup> The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP enabled communications. VON Coalition members are developing and delivering voice and other communications applications that may be used over the Internet. For more information, see [www.von.org](http://www.von.org).

<sup>2</sup> *Rural Call Completion*, Second Further Notice of Proposed Rulemaking, WC Docket No. 13-39 (rel. Jul. 14, 2017); 82 Fed. Reg. 34911 (July 27, 2017) (establishing the August 28, 2017 comment deadline).

<sup>3</sup> FNPRM at para. 28.

<sup>4</sup> Id.

<sup>5</sup> Id. at para. 7.

**Monitoring Requirements.** VON is skeptical about the Commission’s proposal to hold covered providers responsible for monitoring rural call completion performance and holding intermediate providers accountable in the event of poor performance.<sup>6</sup> In particular, VoIP providers typically hand off traffic to competitive local exchange carriers or other transport providers that route the traffic in the most cost-effective way. It would be difficult for VoIP providers to “hold accountable” those CLECs and other transport providers. VoIP providers have an interest in making sure all of their customers’ outbound calls are completed. If a VoIP provider learns that calls that transit a specific CLEC or other intermediate transport provider are repeatedly not completed, the VoIP provider can terminate those carrier agreements. Moreover, existing rules already prohibit VoIP providers from blocking, reducing or restricting traffic. If such action was done deliberately, the Commission could exercise its enforcement jurisdiction.

Rather than new rules, the Commission should allow VoIP providers the opportunity to self-regulate, backed by enforcement of existing rules. VoIP providers are competing vigorously for end user customers. Ultimately the marketplace will require a high quality of service at reasonable rates. Imposing unnecessary regulatory costs and convoluted new rules with only speculative benefit is unnecessary and counter-productive.<sup>7</sup>

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<sup>6</sup> Id. at para. 11.

<sup>7</sup> Moreover, if the Commission vigorously maintains its transition to a bill and keep methodology, there will be no financial incentives for any transport carrier to not complete calls to (presumably high-cost) rural areas. Id. at para. 3/

## CONCLUSION

For the foregoing reasons, the Commission should act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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