



October 23, 2013

(Filed electronically)

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: **Ex Parte Notice – WC 13-39 – Rural Call Completion**

Dear Ms. Dortch:

On October 21, 2013, Glenn Richards, Executive Director of the Voice on the Net Coalition (VON) and John Gasparini, VON intern, met separately with 1) Rebekah Goodheart, Legal Advisor to Acting Chairwoman Clyburn, Travis Litman, Wireline Competition Bureau, Christopher Killion, Enforcement Bureau, 2) Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel and Christianna Lewis Barnhart, Wireline Competition Bureau; and, 3) Nicholas Degani, Legal Advisor to Commissioner Pai,

During the meeting, VON discussed its comments and reply comments filed in the above referenced proceedings concerning proposed requirements to record and retain data to measure call completion rates to rural areas. More specifically, VON made the following points:

- The reporting and record retention requirements are unnecessary as the Commission already has the tools necessary to reduce and eliminate alleged rural call completion problems.
- The record does not support that interconnected VoIP providers are responsible for alleged rural call completion problems.
- The Commission does not have the statutory authority to impose the proposed requirements on providers of interconnected or one-way-VoIP services.
- The Commission should not impose reporting requirements on service providers that do not determine call paths.
- The Commission should consider adding a sunset provision for the reporting requirement, if adopted.
- Any new rules concerning false ringing should become effective no sooner than 90 days following publication of the Order in the Federal Register.
- The Commission should allow all individual company filings to be kept confidential though it may use aggregated data in public documents.
- The Commission should not require retention of call data to non-rural areas.
- If the Commission acts, it should exempt small providers (serving less than 1 million customers) from the reporting requirement.



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Please contact me directly if you have any questions.

Sincerely,

*/s/*

Glenn S. Richards  
Executive Director

cc: Rebekah Goodheart (by email)  
Travis Litman (by email)  
Christopher Killion (by email)  
Priscilla Delgado Argeris (by email)  
Christianna Lewis Barnhart (by email)  
Nicholas Degani (by email)