

**BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI**

An Investigation into Call Routing and  
Call Completion Problems in the  
State of Missouri

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**File No. TW-2012-0112**

**CenturyLink's Response to Staff Report**

Comes now, CenturyLink Communications, CenturyLink Long Distance and CenturyLink QCC (collectively "CenturyLink") and submits this response to Staff's Report regarding the investigation into call routing and call completion problems in the State of Missouri.

**I. INTRODUCTION**

Over the last few years, CenturyLink has been very involved in dockets and investigations of call routing and call completion at the state and federal levels and has played a large role in working toward technical standards that would govern the industry. The issues raised in this docket are nationwide in scope and are being considered and addressed at both the national level and in many states.<sup>1</sup> As noted in prior comments, it remains important for these issues to be considered and addressed consistently and comprehensively in these various forums, since any problems and any proposed solutions will likely affect interexchange traffic in both the interstate and intrastate jurisdictions. CenturyLink believes that the issues in this docket are best addressed through industry cooperation and the development of appropriate technical standards and "best practices", and strongly urges this Commission to develop these

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<sup>1</sup> See, e.g., the FCC's Rural Call Completion Task Force and the Nebraska and Oregon proceedings noted in the Rural Carriers' Petitions as well as the Background section of the Workshop Notice. See also, FCC 13-18, WC Docket no. 13-39, *In the Matter of Rural Call Completion*, Notice of Proposed Rulemaking, Released February 7, 2013.

technical standards and best practices in reliance on input from all sectors of the industry and in accord with the work of ATIS.

## II. STAFF'S INVESTIGATION/ROOT CAUSE ANALYSIS

Staff's investigation into rural call routing and call completion issues involved limited empirical data collected from one rural carrier, Grand River Mutual Telephone Company, and the proprietary toll traffic data retrieved from its Signaling System 7 messages used for this traffic. While this might provide some insight and anecdotal information, CenturyLink believes that any investigation must involve all members of the industry contributing and analyzing information. It is impossible to test Staff's analysis of this limited data based on the information provided in the report and CenturyLink believes that additional investigations into the root cause of the call routing and call completion issues should be conducted. These investigations should include testing with the interexchange carriers delivering the traffic.

Further, staff has reached a number of sweeping conclusions in its report that are drawn from a small subset of traffic actually examined in their investigation with only one rural local exchange carrier.<sup>2</sup> Is the problem really widespread, taking into account the millions of minutes of traffic that are delivered weekly across the state to all local exchange carriers? Staff's review of the data from Grand River Mutual Telephone Company concludes that only 3% of the traffic examined involved "circuitous routing and traffic reorigination", and staff concludes that they "suspect" the percentage of affected calls would have been greater if all long-distance traffic were examined.

Investigations and the conclusions drawn from them should be based on a large sample

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<sup>2</sup> CenturyLink would note that the examination of traffic from only *one* rural local exchange carrier cannot be used to reach statistically valid conclusions about *all* toll traffic to *all* rural local exchange carriers. Indeed, Grand River Mutual Telephone Company's results may be an anomaly without empirical data from other rural LECs to compare it to.

of empirical data and not on the unsupported suspicions and suppositions of the investigators.

### **III. COMMISSION AUTHORITY**

Based on the Missouri laws and regulations identified by the Commission's legal counsel at the Workshop and in subsequent filings, it appears that Missouri already has in place the necessary laws and regulations to address call routing and completion issues.<sup>3</sup> Therefore, the Missouri Commission should focus its efforts on identifying the root causes of the problems and on developing appropriate and workable mechanisms for resolving the problems based on the identified causes.

### **IV. STAFF COUNSEL'S LEGAL ANALYSIS**

The Commission has requested comment on Staff Counsel's legal analysis that concluded that "intermediate providers (least-cost routers) must be certificated or registered with the Missouri Commission". CenturyLink would note that long-distance traffic is carried over inter- and intra-state routes that include transiting carriers that may or may not be certificated in every state that the traffic touches. CenturyLink believes that to require this type of certification would impose unenforceable regulations and solutions that would steeply increase the cost of delivering long-distance traffic. The fact of the matter is, carriers like CenturyLink look for efficient and reliable routes to deliver long-distance traffic and must utilize underlying carriers to maximize efficiencies and reach areas where CenturyLink may not have facilities of its own. CenturyLink, in its agreements with termination vendors, requires its underlying carriers to comply with the state laws where the underlying carriers are terminating traffic to local exchange

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<sup>3</sup> See, staff's written presentation "Call Gapping Telecommunications Workshop, Staff Counsel's Legal Analysis," prepared by Cully Dale, November 7, 2011.

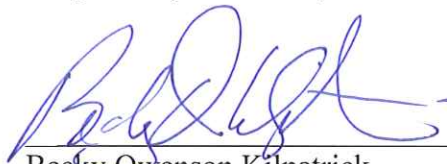


companies, which would include certification and interconnection agreements. In the case where those carriers are terminating calls, this is entirely appropriate. But intermediary underlying carriers that don't terminate to an end-user customers should not be subject to the same certification requirements.

**V. CONCLUSION**

CenturyLink has participated at the state and federal levels to help determine solutions for the issues raised by rural local exchange companies and has established a vigorous internal process for handling call routing and call completion issues raised by its customers on an expedited basis. CenturyLink requires its underlying carriers to comply with state laws and meet performance goals for delivering traffic. CenturyLink believes that the Missouri Commission would be well advised to work in coordination with the Federal Communications Commission's efforts to develop technical standards and best practices in reliance on input from all sectors of the industry and in accord with the work of ATIS.

Respectfully submitted,



Becky Owenson Kilpatrick  
Missouri Bar No. 42042  
319 Madison Street  
Jefferson City, Missouri 65101  
Tel: 573.636.4261  
E-Mail: [becky.kilpatrick@centurylink.com](mailto:becky.kilpatrick@centurylink.com)

*On Behalf of CenturyLink*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was served by facsimile, hand-delivery, or electronic mail, on the 3rd day of May, 2013, on the following:

Colleen M. Dale  
Senior Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101  
[cully.dale@psc.mo.gov](mailto:cully.dale@psc.mo.gov)

Office of General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Lewis Mills  
Public Counsel  
P.O. Box 2200  
Jefferson City, MO 65101  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

  
Becky Owenson Kilpatrick