



Jeffrey E. Lewis
General Attorney &
Associate General Counsel
Missouri and Kansas

AT&T Services, Inc.
One AT&T Center
Room 3520
St. Louis, Missouri 63101

T: 314-235-4300
F: 314-247-0014
jeffrey.e.lewis@att.com

November 17, 2011

Mr. Steven C. Reed
Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: An Investigation Examining Call Routing and Call Completion Problems
in the State of Missouri - Case No. TW-2012-0112

Dear Mr. Reed:

AT&T¹ appreciates the opportunity to offer comments to the Missouri Public Service Commission ("Commission") in follow-up to the issues discussed at the Commission's November 7th workshop on call completion problems.

AT&T shares the Commission's concerns regarding potential call completion issues and the related provision of reliable service to end users. We are willing to work with the Commission, as well as with rural carriers and telecommunications service providers, to identify call completion problems and work together to ensure the interconnection and interoperation of provider networks and the completion of calls.

As panelist Mark Lancaster, Business Manager, AT&T Network Operations, remarked during the workshop, AT&T has implemented a series of comprehensive internal best practices with our call termination suppliers to ensure that calls are appropriately routed and completed. For example, AT&T's contracts with such suppliers include provisions that require the completion of calls, prohibit alteration of calling party numbers or other signaling parameters, and require suppliers to comply with all applicable laws. AT&T monitors supplier performance according to our internal quality standards and maintains sufficient direct termination capacity in the event that a call termination supplier cannot properly terminate the call.

AT&T encourages local exchange providers to document and refer to our attention customer complaints regarding call failures. This documentation assists AT&T in performing a root cause analysis and properly investigates the problem. Helpful information includes providing calling and called numbers, the time and date of the call, the disposition of the call, and other available information. AT&T also provides local exchange carriers with internal contact information for the reporting of call problems. In addition to reporting problems in real time through ATT's

¹ Reference to "AT&T" includes Southwestern Bell Telephone Company d/b/a/ AT&T Missouri, SBC Long Distance, LLC d/b/a/ AT&T Long Distance, and AT&T Communications of Southwest, Inc.

normal trouble reporting procedures, carriers should send an email with a trouble ticket number to Penn Pfautz (ppfautz@att.com), Director-AT&T Access Finance, who is coordinating our data collection efforts on this issue.

AT&T supports the work underway in the Alliance for Telecommunications Industry Solutions (ATIS), a global standards development and technical planning organization that develops technical and operations standards for information, entertainment and communications technologies. ATIS began working on the call completion issue earlier this year and has opened a program directed at collecting information about the call completion problems and providing additional guidance to rural telcos. The Next Generation Interconnection Interoperability Forum of ATIS is in the process of developing a handbook based on documentation and data provided by associations, state public service commissions, and rural telecommunications companies regarding call completion problems. It is anticipated that this handbook will highlight key information that may be beneficial in resolving call termination/delivery issues.

AT&T is also participating with the industry's efforts in support of the FCC's establishment of the Rural Call Completion Task Force, which is also investigating the issue. We encourage the FCC to work with carriers and industry participants to deal with the issue on a national basis. AT&T was a participant at the FCC's October 18th workshop where we made clear that AT&T's business is "completing calls, not dropping them." AT&T also made clear that we are willing to work with the rural carriers on these issues and we are dedicated to ending relationships with any non-compliant suppliers.

We note that at the Commission's November 7th workshop, Commission staff counsel provided an insightful legal analysis that found that existing Missouri law requires telecommunications companies to transport traffic on to its final destination and pay properly tariffed access charges. In our view, the Commission has the appropriate and necessary statutory authority to pursue enforcement actions against those carriers that unlawfully refuse to properly terminate or route calls. We agree that rural carriers should bring to the Commission's attention the names of any carriers that are unlawfully refusing to terminate calls so that the Commission can pursue appropriate enforcement action. However, prior to taking such action, we recommend that the rural carriers try to work with the companies they believe to be inappropriately routing traffic or otherwise causing calls to not terminate properly. To the extent these companies are unwilling to work with the rural carriers, we recommend the rural carriers involve the Commission staff to help facilitate communications among the affect companies. If such informal methods prove ineffective, then it may be appropriate for the Commission to pursue the necessary enforcement action.

AT&T is more than willing to work with the rural carriers in Missouri, as well as the Commission, to further identify and offer solutions to resolve any call termination problems. We would appreciate the opportunity to continue to provide input and discuss ways where we can further improve industry interconnection and trouble reporting, particularly as the telecommunications industry transitions to IP-enabled and other emerging technologies.

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If you have any questions, please let me know.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Lewis', with a long, sweeping horizontal stroke extending to the right.

Jeffrey E. Lewis

cc: Office of General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102