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November 18, 2011

Mr. Steven Reed
Secretary of the Commission
Missouri Public Service Commission

Filed via EFIS

RE: Investigation into Call Completion and Routing Problems
Case No. TW-2012-0112

Dear Mr. Reed:

This correspondence is to provide additional comment and feedback on behalf of The Missouri Small Telephone Company Group (STCG)¹ following the November 7, 2011 workshop on call completion and routing problems. As you are aware, recent problems with call completion and routing have serious impacts for rural telephone subscribers and the small rural telephone companies that serve them. The problem also harms customers in other parts of the state that are unable to reach the rural customers.

Comments on the Nature and Scope of the Problems.

Over the last twelve months, problems with the completion of calls and quality of calls to the STCG's rural telephone exchanges have increased significantly. The problem is widespread and growing. Examples of call completion problems include fast busy signals, dead air (i.e. no ring tone), calls that ring several times and are then followed by dead air, and improper call intercepts (e.g. "number is no longer in service"). Examples of call quality problems include calls where the called party cannot hear the calling party (or vice versa), static or interference on the line, and delays or echoes between the parties to the call. Examples of caller identification problem include incorrect Caller ID information (e.g. "Anonymous") or Caller ID indicating that the call has originated from another location (e.g. California).

STCG member companies have received increasing complaints about these problems. However, call completion problems are typically identified only if a calling party communicates the concern to the called party, and then only if the called party in turn reports this concern to its

¹ See Attachment A.

serving rural local exchange carrier (RLEC). Thus, the STCG believes that the vast majority of problem calls failing to complete or being transmitted with unintelligible or incorrect caller ID are unlikely to be reported or identified.

In other words, the increase in reported complaints are just the “tip of the iceberg” for two reasons: (1) call failures on the originating end only come to the RLECs’ attention when the RLEC customer learns that he or she has not received calls placed, and (2) if the problems persist, a customer may grow frustrated and simply give up on reporting repeated failures.

The STCG’s recent experiences with the problems as well as information filed before the FCC and other states indicate that this problem is a nationwide and industry-wide epidemic that compromises the integrity and reliability of the public switched telecommunications network (PSTN) and directly harms consumers. For example, small businesses in rural Missouri lose sales, citizens are unable to reach educational institutions or government offices, and families are unable to communicate and check on the safety and well-being of their loved ones. To make matters worse, some customers may blame the STCG member company for the problem calls. As a result, the company endures the loss of goodwill even after spending numerous hours trying to track down the cause of complaints and resolve them.

Although the STCG member companies have had little success in resolving the problem thus far, the STCG is encouraged by the Commission’s decision to open this docket and examine the issues.

Proposed DRs for Missouri-Certificated, Retail Intrastate Interexchange Carriers.

Originating interexchange carriers determine the routing of their calls and any third-party providers to assist with delivering the calls to rural exchanges. It has been difficult for the STCG companies to identify those carriers, sometimes referred to as least cost routers, that are responsible for the call completion and routing problems. Accordingly, the STCG recommends that the Commission Staff send out a limited and narrow Data Request to all Missouri-Certificated, Retail Intrastate, Interexchange Carriers. The STCG suggests that the Data Requests include the following questions.

1. Please identify each least-cost router, interexchange carrier (“IXC”), and any other wholesale relationship (collectively, “LCRs”) that you utilize for the transmission and termination of 1+ and any other long distance/toll calls (“Calls”) placed by your retail end user customers.
2. Please provide a detailed explanation, including any routing table information, indicating how you choose which LCR you will use for the transmission of any given Call.
3. Please produce any and all documentation explaining your policies with respect to management of LCRs (to include any monitoring or review of the actual service provided by LCRs).

Thank you for the opportunity to file these comments, and please let me know if you have any questions.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By: **/s/ Trip England**

William R. England, III

cc: John Van Eschen
Bill Voight

ATTACHMENT A

BPS Telephone Company
Citizens Telephone Company of Higginsville, Mo.
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Fidelity Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corp.
Green Hills Telephone Corp.
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
Le-Ru Telephone Company
Mark Twain Rural Telephone Company
McDonald County Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Northeast Missouri Rural Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Company
Peace Valley Telephone Co., Inc.
Rock Port Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company