



interest benefits.”<sup>3</sup> CTIA urges the Commission to eliminate the recording and retention rules to reduce the “substantial, unnecessary costs imposed on covered providers.”<sup>4</sup>

ATIS in its comments urged the Commission not to mandate the Best Practices from the *ATIS Intercarrier Call Completion/Call Termination Handbook*<sup>5</sup> (ATIS RCC Handbook) for intermediate carriers.<sup>6</sup> This view is supported by a number of commenters.<sup>7</sup> Verizon for instance currently notes that “[r]equiring intermediate providers to implement the best practices outlined in the *Third FNPRM* would reduce the flexibility providers need to manage their networks.”<sup>8</sup> USTelecom – The Broadband Association further notes that mandating these Best Practices could have the same chilling effects on future industry cooperation as mandating compliance with the ATIS RCC Handbook on covered providers would have had.<sup>9</sup>

ATIS also expressed concerns in its comments with the Commission’s proposed 30-day deadline for covered providers to ensure that they may only use registered intermediate providers, noting that a longer implementation deadline is warranted to permit service providers to cancel existing agreements with unregistered providers, replace these with new contracts as necessary with registered providers and make any necessary changes to their routing systems.<sup>10</sup> ATIS notes that the need for additional time for covered providers is consistent with the views

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<sup>3</sup> Comments of Sprint at p. 4.

<sup>4</sup> Comments of CTIA at p. 4.

<sup>5</sup> *The ATIS Intercarrier Call Completion/Call Termination Handbook* is available on a complimentary basis from the ATIS Document Center at <https://www.atis.org/docstore/product.aspx?id=26780>.

<sup>6</sup> ATIS Comments at pp. 2, 4-5.

<sup>7</sup> See Comments of Verizon at pp. 8-9; Comments of USTelecom – The Broadband Association at p.7; Comments of NCTA—The Internet & Television Association at p. 5.

<sup>8</sup> Comments of Verizon at pp. 8-9.

<sup>9</sup> Comments of USTelecom – The Broadband Association at p. 7.

<sup>10</sup> ATIS Comments at pp. 3-4.

expressed by commenters such as ITTA – The Voice of America’s Broadband Providers, Sprint, and INCOMPAS.<sup>11</sup>

In the *Third FNPRM*, the Commission asks whether it should require intermediate providers to certify compliance with these rules in their annual certifications.<sup>12</sup> ATIS opposes such a certification requirement, believing it to be burdensome and unnecessary. The mandated monitoring and correction requirements adopted in the *Second Report and Order* and threat of enforcement by the Commission of the intermediate carrier obligations should be sufficient to allow non-compliant intermediate providers to be identified and appropriately managed.

Finally, ATIS notes that the Commission also seeks input on which, if any, duties it should impose on intermediate providers to complete calls. The Commission asks, for example, whether it should explicitly prohibit intermediate providers from blocking or restricting calls to rural areas.<sup>13</sup> ATIS NGIIF believes that applying the Commission’s existing blocking prohibition<sup>14</sup> to intermediate carriers would be beneficial and could help to mitigate call completion issues.

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<sup>11</sup> Comments of ITTA – The Voice of America’s Broadband Providers; Comments of Sprint a pp.2-3; Comments of INCOMPAS at pp. 7-9.

<sup>12</sup> *Third FNPRM* at ¶88.

<sup>13</sup> *Third FNPRM* at ¶93.

<sup>14</sup> *Establishing Just and Reasonable Rates for Local Exchange Carriers; Call Blocking by Carriers*, WC Docket No. 07-135, 22 FCC Rcd 11629 at n. 1234 (2007); *Call Blocking Declaratory Ruling*, 22 FCC Rcd 11631 ¶ 6; *see also* ATIS RCC Handbook at pp. 49-50.

### III. CONCLUSION

ATIS appreciates the opportunity to provide this further input to the *Third FNPRM* and urges the Commission to consider the recommendations above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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