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November 3, 2020

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, N.E.
Washington, D.C. 20554

Re: WC Docket No. 13-39
Ex Parte

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS) is pleased to provide an update on its work to combat call completion issues. ATIS' Next Generation Interconnection Interoperability Forum (NGIIF) notes that, in the recently adopted *Report and Request for Comment*, the Commission finds that its call completion rules have been effective in contributing to a reduction in rural call completion issues. ATIS NGIIF is pleased to have played a role in addressing call completion issues through its work to identify and address call completion issues and its publication of its *Intercarrier Call Completion/Call Termination Handbook*.

ATIS NGIIF addresses next generation network interconnection and interoperability topics associated with emerging technologies. Specifically, it develops operational procedures that involve the network aspects of architecture, disaster preparedness, installation, maintenance, management, reliability, routing, security, and testing between network operators. In addition, the NGIIF addresses issues that impact the interconnection of existing and next generation networks and facilitate the transition to emerging technologies.

ATIS NGIIF developed and maintains the *Intercarrier Call Completion/Call Termination Handbook*, which provides guidance to the industry regarding industry signaling, routing, and trouble handling standards and practices that are relevant to ensuring call completion and best practices for ensuring call completion.¹

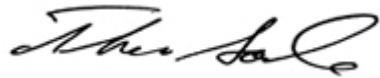
ATIS NGIIF continues to examine call completion issues and has published two updates to this handbook in recent years. The first update, completed in November 2019, amended the handbook to address the registration of intermediate providers to reflect changes to the Commission's rules on this matter. The second update, completed in June 2020, to address the use of call analytics, including blacklist and whitelists. ATIS NGIIF will continue to address call completion matter and welcomes participation in this effort from all stakeholders.

¹ The ATIS *Intercarrier Call Completion/Call Termination Handbook* (ATIS=0300106) is available at: <https://www.atis.org/committees-forums/ngiif/>.

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ATIS appreciates the opportunity to provide this input. If there are any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is written in a cursive style with a large, looping initial "T".

Thomas Goode
ATIS General Counsel