



OREGON CALL TERMINATION ISSUES WORKSHOP

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Failure of Call Termination is a Major Issue

- It affects customers
- It affects companies



Customers' Experiences

- Customers continue to suffer due to call incompleteness
- Customer call completion issues
 - Ring tone with no answer – rings 10-20 times – caller hangs up
 - “Dead Air”
 - One-way conversations (one party can hear the other, but the second cannot hear the first)
 - Incorrect caller ID displayed to called party
 - Caller receives incorrect or misleading message interceptions before call reaches tandem



Customers' Experiences

- Lack of call termination results in customer confusion and frustration
 - Customers around the country don't understand or care about the reason why they cannot complete calls to OTA members
 - Customers often blame OTA members
 - OTA members' customers switching to wireless competitors



Customers' Experiences

- Many calls don't reach OTA members' networks or the tandem that each OTA member sub-tends
 - Makes it difficult to trace calls and troubleshoot issues



Company Experiences

- Coincident with major fluctuations in terminating minutes from various carriers
 - Abnormally large decline in terminating access minutes
 - Occurring statewide
 - Involves both interstate and intrastate terminating access traffic
 - Involves both originating wireline and wireless traffic



Analysis of Termination Issues

- Increase in non-completed calls are *not* due to inadequacies of OTA members' networks
- Possible problems with multi-frequency signaling translations between IP transport and OTA members' networks
 - Originating call numbers are missing/altered in billing records
- Large increase in unanswered calls across rural ILEC exchanges



“Least-Cost Routing” Could be a Cause of Call Termination Problems

- Carriers are using LCR to reduce terminating costs
 - Appear to sacrifice call quality
 - Carriers may not complete calls to terminating customers
 - Calls are “looping” between LCR subcontractors
- Direct violation of FCC Order
 - “Commission precedent provides that no carriers, including interexchange carriers, may block, choke, reduce or restrict traffic in any way.” *In the Matter of Call Blocking by Carriers*, DA 07-2863, para. 6 (June 28, 2007).



“Least-Cost Routing” Could be a Cause of Call Termination Problems

- Non-termination is in effect “call blocking”
 - Cost reduction/elimination for underlying carrier
 - Forces end user to choose another carrier that does not block, choke or restrict traffic via LCR, or to cease making calls to that location.
- Results in customer isolation, disruption of interstate commerce, degradation of the PSTN, and conflicts with interconnection and universal service principles.



Actions OTA Members Are Taking To Address Call Termination Problems

- Working with customers and originating callers of other carriers
- Performing traffic studies to compare SS7 messages to billing records in attempt to find “missing calls”
 - Canby has completed its study
- Conducting investigations which are expensive, time-consuming and conducted with no specific obligation from suspected carrier(s) to cooperate
 - Trouble reports have been submitted to carrier(s) that may be source of problem – with varied response
- Reported blocking problems to OPUC



State Statutes Involved

- ORS 759.280

- No person shall knowingly solicit, accept or receive any rebate, concession or discrimination in respect to any service whereby any such service shall, by any device, be rendered free or at a lesser rate than that named in the published schedules and tariffs in force, or whereby any service or advantage is received other than authorized in this chapter.



State Statutes Involved

- **ORS 759.450(4)**

- Consistent with the federal Telecommunications Act of 1996 (Public Law 104-104), as amended and in effect on September 1, 1999, the commission may establish minimum service quality standards related to providing wholesale, interconnection, transport and termination services provided by a telecommunications carrier and those telecommunications utilities and competitive telecommunications providers that provide wholesale telecommunications services.



Violation of Certificate Conditions

- The Commission issues a list of specific conditions that a CLEC must meet in order to maintain its certificate.¹

- “...terminate all intrastate traffic originating on the networks of other telecommunications providers that have been issued a certificate of authority by the Commission.”

This can be interpreted to mean that if a transiting carrier fails to complete a call, it has violated its duties under its certificate.

- “For purposes of distinguishing between local and toll calling, Applicant shall adhere to local exchange boundaries and Extended Area Service (EAS) routes established by the Commission.”

This can be read that disguising toll calls as local calls is a violation of this condition.

¹ Source, Order No. 96-021 and Order No. 04-486.



POSSIBLE OPUC ACTION – NEEDED NOW

- Reaffirm that all traffic, IP – and circuit-switched, is required to pay proper jurisdictional compensation for originating and terminating access.
- Declare non-payment of tariffed ICC charges to be unlawful
 - Disputes over tariffed charges must be resolved via tariffed dispute resolution procedures or through regulatory intervention, not through withholding of payments and blocking of traffic
- Declare intention to impose significant fines on carriers found to knowingly cause blocked calls
- Investigate routing-practices of wholesale carriers, including VoIP transport providers
- Enforce LERG routing requirements to designated tandems