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IOWA UTILITIES BOARD

QWEST COMMUNICATIONS COMPANY
D/B/A CENTURYLINK QCC

DIRECT TESTIMONY

OF

MARY RETKA

State of Iowa
Department of Commerce - Utilities Board
Docket No. FCU-2012-0019
December 13, 2013

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I. IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.

A. My name is Mary Retka. My business address is 700 W. Mineral Ave., Littleton, Colorado. I am employed by CenturyLink as a Director Public Policy – Network Policy Issues.

Q. PLEASE GIVE A BRIEF BACKGROUND OF YOUR EDUCATION AND TELEPHONE COMPANY EXPERIENCE.

A. I have a bachelor’s degree from South Dakota State University, and successfully completed the University of Minnesota Carlson School of Business Executive Development Program, and Executive MBA Alternative Program. With nearly 40 years of service in the telecommunications business, I have worked in Public Policy, Network, Data Communications Product Evaluation, Project Management of the AT&T Embedded Base Transfer, Systems Planning and Engineering, Global Account Information Movement & Management, Pricing, Business Office Supervision, High Demand Account Management, and more. This included working for Northwestern Bell, AT&T, US WEST, QWEST, and CenturyLink.

Q. HAVE YOU TESTIFIED PREVIOUSLY IN IOWA?

A. No

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II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address the issues raised by the Board in its Order initiating this docket. In order to provide some contextual background for the issues in this docket, I will first discuss the national scope of the call termination issues and steps the Federal Communications Commission (“FCC”) is taking to address the issue. I will then discuss processes CenturyLink has in place to limit termination issues and the steps that CenturyLink takes when termination issues are discovered. Next, to help quantify the extent of the issue, I will present a call termination study CenturyLink has undertaken. Finally, I will discuss the specific investigation and status of the Rehabilitation Center of Allison, Iowa (“Allison”) call termination reports.

III. CALL TERMINATION BACKGROUND

Q. BEFORE ADDRESSING THE SPECIFIC COMPLAINTS REGARDING ALLISON, PLEASE PROVIDE SOME BACKGROUND ON CALL TERMINATION ISSUES NATIONALLY AND STEPS THE FCC IS TAKING TO ADDRESS THE ISSUE.

A. In discussing call termination issues, it is important to note that the vast majority of long distance calls are carried and terminated without any issues. It is also important to note the complexity of the Nation’s long distance network. This network is comprised of many interconnecting networks utilizing a variety of evolving technologies (*e.g.*, Time Division Multiplexing (“TDM”), Internet

1 Protocol (“IP”), wireline, and wireless) of different vintages. There are potentially
2 thousands of interconnecting service providers and thousands of points of
3 interconnection across the United States. Since the long distance market was
4 opened to competition, it has always been the case that a relatively small number of
5 long distance calls fail to satisfactorily reach the called party. Although traditional
6 long distance providers strive to have all calls satisfactorily complete, the reality of
7 the current operating environment is that a zero long distance call failure rate is not
8 achievable.

9
10 In recent years reports of call completion issues have become more prevalent,
11 particularly in rural areas. This is not just an Iowa issue or a CenturyLink issue but
12 is truly a national issue. Earlier this year the FCC opened a docket and issued a
13 Notice of Proposed Rulemaking to investigate rural call completion issues.¹ In
14 November of this year the FCC issued a Report and Order and Notice of Further
15 Rulemaking² adopting rules to address termination issues. I will discuss the FCC’s
16 rules a bit later in my testimony.

17
18 **Q. WHAT IS THE CAUSE OF CALL COMPLETION ISSUES?**

¹ *Rural Call Completion*, WC Docket No. 13-39, Notice of Proposed Rulemaking, FCC 13-18, 28 FCC Rcd 1569 (rel. Feb. 7, 2013).

² *Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-135, 2013 FCC LEXIS 4330 (rel. Nov. 8, 2013).

1 A. This is a complex technical issue; unfortunately, there is no one single cause of call
2 termination issues. Termination issues can, and do occur for a myriad of technical
3 reasons.

4
5 **Q. MANY RURAL CARRIERS AND THE FCC HAVE FOCUSED ON THE**
6 **FACT THAT LONG DISTANCE CARRIERS OFTEN HAND OFF CALLS**
7 **TO INTERMEDIATE, OR UNDERLYING CARRIERS WHO, IN TURN,**
8 **DELIVER THE CALLS TO THE END-USER'S LOCAL EXCHANGE**
9 **CARRIER FOR TERMINATION. IS THE PRACTICE OF USING**
10 **UNDERLYING CARRIERS TRULY THE CAUSE OF CALL**
11 **TERMINATION ISSUES?**

12 A. No. The majority of underlying carriers are reliable in completing long distance
13 calls. The use of underlying carriers by long distance providers predates the rise of
14 the current call completion issue. Underlying carriers have been used to expand the
15 reach of long distance networks, provide back-up facilities in the event of network
16 outages, and handle overflow traffic during high call volume periods. While some
17 underlying carriers' practices and some lack of monitoring by a few of the long
18 distance carriers who hand them the calls can contribute to call termination
19 problems, the use of underlying carriers is not a direct cause of the problem.
20 Underlying carriers fulfill a very real need in most of the long distance networks to
21 carry traffic in areas where providers' resources may be lacking. Perhaps only a
22 single IXC in the industry has a ubiquitous self-provisioned, long distance network.
23 Business drivers and marketplace drivers along with a growth in the use of long

1 distance communications have all led to a long distance business practice that
2 includes the use of a more extensive framework of underlying carriers specializing
3 in carrying calls for some of the IXCs.

4
5 I would acknowledge that business case drivers exist for long distance providers to
6 expand their call completion capabilities by securing the services of responsible
7 underlying carriers that provide the network connections for a more ubiquitous
8 connectivity that can in some cases reduce their call termination costs. But, as
9 financially attractive as it may be, this business case is only sustainable where, after
10 due diligence testing, it is demonstrated that an underlying carrier under
11 consideration is fully capable of reliably transporting traffic and appropriately
12 compensating terminating providers in a manner that meets the service quality
13 standards of the long distance provider. If long distance customers have negative
14 calling experiences, those customers will inevitably choose another provider as their
15 preferred interexchange carrier.

16
17 **Q. WHY DO LONG DISTANCE PROVIDERS USE UNDERLYING**
18 **CARRIERS?**

19 A.. For many years, long distance providers have successfully used underlying carriers
20 to expand their own facilities and provide network reliability and business
21 continuity, directly connecting to a termination point in the Public Switched
22 Telephone Network (“PSTN”). Underlying Carriers have also been used to provide
23 important connectivity to increase the reliability of the networks of long distance

1 providers by additionally supplying back-up facilities in the event of network
2 outages. Additionally, because traffic flows are constantly changing, long distance
3 providers have used underlying carriers to handle overflow traffic in those more
4 immediate instances where the capital investment for additional facilities cannot be
5 justified because spikes in traffic volumes are either infrequent or unpredictable.

6
7 **Q. WOULD IT BE A MISTAKE TO ATTRIBUTE ALL TERMINATION**
8 **PROBLEMS TO A SINGLE CAUSE SUCH AS UNDERLYING CARRIERS?**

9 A. Yes. While it would be convenient to be able to point to one single cause of
10 termination issues, the reality is much more complex. There are a lot of elements
11 that go into completing a long distance call, any one of which can cause problems.
12 In a call path, network equipment, equipment components, transport facilities and
13 customer owned/controlled equipment can impact the characteristics of a call (each
14 individual component or component part, or an entire path such as in an SS7
15 signaling outage) and its ability to complete. Complicating the issue is that such
16 problems can be intermittent, such as a wet or weather-impacted cable. Call routing
17 is just one aspect of a plethora of network components.

18
19 **Q. TO WHAT EXTENT CAN THE CALL COMPLETION PROBLEMS BE**
20 **ATTRIBUTED TO CALL ROUTING TABLES OR PROBLEMATIC**
21 **ROUTES IN IOWA?**

1 A. Routing tables are just one function in the long distance call processing. We have
2 not seen any data, or a pattern of customer complaints, that support a conclusion
3 that the routing tables or particular routes in Iowa are problematic.

4
5 **Q. HOW HAS THE FCC ADDRESSED CALL TERMINATION ISSUES?**

6 A. In its 2011 USF/ICC Transformation Order³ the FCC took a number of steps that
7 will have an impact on call termination issues. It reiterated its prohibition on call
8 blocking and made clear that the general prohibition on call blocking by carriers
9 applies to VoIP-to-PSTN traffic. It prohibited call blocking by providers of
10 interconnected VoIP services as well as providers of “one-way” VoIP services. It
11 also mandated a transition to a bill and keep regime for the termination of long
12 distance calls, thus eliminating high terminating switched access rates in rural call
13 areas.

14
15 In its November 8, 2013 Report and Order and Notice of Further Proposed Rule
16 Making, the FCC released additional rules related to rural call completion. The
17 rules do not set forth performance standards but impose detailed recording,
18 reporting and data retention requirements on carriers that provide long distance
19 service to 100,000 or more customers. The rules also prohibit any carrier from
20 providing audible ringing before the terminating carrier signals that the line is free
21 and the called party is being notified. In addition, the FCC announced an additional

³ In the Matter of Connect America Fund, “Report and Order and Further Notice of Proposed Rulemaking,” FCC 11-161 (released November 18, 2011).

1 rulemaking to address various additional possible rule changes. The following is a
2 brief summary of the rules and additional areas of rulemaking.

3 **Recording and Retention Requirements**

- 4 • Recording requirements apply to calls made to rural telephone companies as
5 identified by Official Company Number (“OCN”) and include significant call
6 detail information.
- 7 • Companies may exclude calls handed back to the originator and calls to toll
8 free numbers
- 9 • Data must be retained for six months for rural OCNs

10 **Reporting Requirements**

- 11
- 12 • Each carrier must file quarterly reports for each rural OCN that provide
13 information sufficient to calculate call answer rates (% calls answered) and
14 “Network Effectiveness Ratio” (% calls answered or signaled as “busy,”
15 “ring no answer” or “unassigned number”).
- 16 • Each carrier must file quarterly reports providing the same information on an
17 aggregate basis to all other OCNs.

18 **Safe Harbors Provisions**

- 19
- 20 • A safe harbor is available that reduces data retention requirement to 3 months
21 and reporting requirements after one year

22 The safe harbor applies to carriers that:

- 23
- 24 1. Certify they use two or fewer intermediate providers
25 (underlying carriers) to reach the terminating provider or
26 tandem; or
- 27 2. Do not use intermediate providers (underlying carriers)

- 28 • Further waivers are available from the Wireline Competition Bureau

29 **False Ringing**

- 30
- 31 • A long distance provider shall not convey a ringing indication to the calling
32 party until the called party has been alerted to the presence of an incoming
33 call.

34

1 **Further Proposed Rulemaking to Address:**

- 2 • Autodialer traffic
- 3 • Intermediate Provider (Underlying Carrier) requirements
- 4 • Modifications to safe harbor
- 5 • Rural Incumbent reporting
- 6 • Prohibitions on blocking, choking or restricting traffic
- 7

8 **Q. IS CENTURYLINK CONTINUING TO WORK WITH REGULATORS TO**
9 **ADDRESS THE RURAL CALL COMPLETION ISSUE?**

10 A. Yes. CenturyLink has cooperated with, and will continue to cooperate with, the FCC
11 and state regulators as they gather information necessary to assess the extent of the
12 rural call completion issue, identify the cause(s) of the issue and fashion appropriate
13 responses to the issue. Additionally, CenturyLink is a member of the Association of
14 Telecommunications Industry Standards (“ATIS”), and has worked at the direction of
15 the FCC with ATIS in the August 2011 workshop, developing, documenting,
16 presenting, and updating the Handbook titled: INTERCARRIER CALL COMPLETION/CALL
17 TERMINATION HANDBOOK.

18

19 The handbook documents industry best practices and was provided to the FCC and the
20 industry, and the industry efforts continue with the current joint National Exchange
21 Carrier Association (“NECA”) and ATIS National Call Completion Testing.

1 **IV. CENTURYLINK CALL TERMINATION PROCESSES**

2 **Q. IS IT IN CENTURYLINK'S BEST INTEREST TO ESTABLISH**
3 **PROCESSES TO LIMIT AND APPROPRIATELY RESPOND TO CALL**
4 **TERMINATION ISSUES?**

5 A. CenturyLink is both a facilities-based provider of long distance services and an
6 incumbent local exchange services provider in both rural and non-rural areas. As
7 such, it has a keen interest in ensuring that its long distance customers have their
8 calls satisfactorily terminate as intended and that its local exchange customers, both
9 rural and non-rural, satisfactorily receive the calls that others place to them.

10
11 Given the traditional and non-traditional communications services available to
12 CenturyLink's long distance customers, any problems experienced in its customers'
13 long distance calling service can inevitably result in those customers choosing
14 another provider as their preferred interexchange carrier or using alternative
15 communications services. Therefore, CenturyLink is highly motivated to provide its
16 long distance customers with reliable, high-quality service and quickly address
17 customer service issues. In order to promptly identify and address rural call
18 completion issues, CenturyLink has established an investigation and resolution
19 process that can be initiated via contact from its customers and Rural Local
20 Exchange Carriers ("RLECs"), including a 24-hour-a-day, 7-days-a-week provider
21 to provider toll free contact line.

1 **Q. HAS CENTURYLINK TAKEN STEPS TO ADDRESS CALL**
2 **TERMINATION ISSUES IN ITS OPERATING TERRITORY?**

3 A. Yes. CenturyLink is committed to addressing call completion issues whether they
4 are brought to its attention by one of its customers or an RLEC. In order to ensure
5 that it is promptly responding to concerns raised by RLECs about failed calls
6 initiated by CenturyLink long distance customers, CenturyLink has established an
7 investigation and resolution process. Our CenturyLink customers also have a toll
8 free, 24-hour-a-day, 7-days-a-week repair center contact point. RLECs have been
9 provided with a dedicated point of contact within CenturyLink to address issues
10 with failed calls to their local service customers. For provider-to-provider call
11 termination trouble reporting, a RLEC can call 866-874-6790,option 1, option 6 to
12 initiate the process.

13

14 CenturyLink customers experiencing call completion issues can contact Repair at
15 the telephone number on their bill. RLEC customers experiencing trouble receiving
16 long distance calls from CenturyLink long distance customers can contact
17 CenturyLink through their RLEC.

18

19 If a CenturyLink long distance customer contacts CenturyLink about an issue
20 completing a long distance call, CenturyLink opens a trouble report ticket for the
21 customer, and an investigation into the cause of the issue is conducted and
22 documented. Once the cause of the issue is identified, it is resolved, and the service
23 is tested to ensure that the customer's issue has been satisfactorily addressed. If the

1 trouble is related to the routing of the call, the route path is reviewed, any issues are
2 identified, and the route path may be changed and tested. Where an underlying
3 carrier was used to route the call and it is identified as the source of the routing
4 trouble, it is removed from the route path, and an investigation of the matter is
5 initiated within the underlying carrier company. Before the underlying carrier is
6 returned to the route path, it must demonstrate to CenturyLink that it has identified
7 the trouble and addressed the source of the trouble through testing. With the routing
8 fix in place and tested, CenturyLink closes the issue with its customer.

9
10 **Q. BEFORE ALLOWING AN UNDERLYING CARRIER TO CARRY**
11 **CENTURYLINK TRAFFIC DOES CENTURYLINK TAKE STEPS TO**
12 **INSURE THAT THE CARRIER HAS THE TECHNICAL CAPABILITY**
13 **AND PRACTICES TO PROVIDE QUALITY SERVICE?**

14 A. Yes. Prior to being introduced to CenturyLink call routes, an underlying carrier
15 must meet the CenturyLink contract terms and conditions to engage in and
16 successfully complete extensive testing with CenturyLink. On an on-going basis
17 the performance of underlying carriers is monitored and to the extent problems are
18 detected, as I noted above, underlying carriers can be removed from certain call
19 routes. Again, it is in CenturyLink's best interest to insure that its customers
20 receive quality long distance service. CenturyLink meets with its underlying
21 carriers as needed in regularly scheduled meetings with them, some weekly, some
22 biweekly and a few that are monthly, to focus primarily on quality. We review
23 trouble tickets, monitor trouble tickets per million Minutes Of Use ("MOU"). We

1 review connect rate and Answer Seizure Ratio. We may also discuss operational
2 issues like trunk group augments, contract amendments, new products, etc.

3
4 **V. CALL TERMINATION STUDY DATA**

5 **Q. MUCH OF THE CALL COMPLETION PROBLEMS EVIDENCE IN THIS**
6 **PROCEEDING ARE ANECDOTAL. DOES SUCH EVIDENCE PRESENT A**
7 **TRUE PICTURE OF CALL COMPLETION ISSUES?**

8 A. No. Anecdotal evidence of a call completion issue is useful but not determinative
9 of the scope and cause of the issue. Relying entirely on anecdotal information tends
10 to obscure the fact that millions of long distance minutes are carried by
11 CenturyLink in a month, and all but a very small percentage terminate successfully.
12 For example, in October of this year, we processed 39,815,637 interstate MOUs
13 terminating into Iowa, and 23,990,455 intrastate MOUs terminating in Iowa.

14
15 **Q. HAS CENTURYLINK UNDERTAKEN A COMPREHENSIVE STUDY TO**
16 **DETERMINE THE TRUE SCOPE OF CALL TERMINATION ISSUES?**

17 A. Yes. On July 17, 2012, the Nebraska Public Service Commission (NE PSC) opened
18 docket Rule and Regulation No. 187 (RR No. 187) to add rules regarding the
19 adequacy of service provided by telecommunications carriers and prohibiting call
20 blocking and choking.⁴ As a part of this proceeding, RLECs and long distance
21 providers participated in voluntary call completion testing with the NE PSC staff.

⁴ *In the Matter of the Commission, on its own motion, seeking to amend Title 291, Chapter 5, Telecommunication Rules and Regulations, to add rules regarding adequacy of service and prohibiting call blocking and choking, Rule and Regulation No. 187 (July 2012).*

1 CenturyLink participated in the testing as a long distance provider. The plan for
2 testing was developed by the NE PSC staff with input from RLECs and long
3 distance providers. Automated testing was done over several weeks during the first
4 quarter of 2013 from the switches of long distance providers to RLEC-provided
5 Milliwatt testing telephone numbers⁵ across Nebraska. Long distance providers
6 reported their test results to the NE PSC staff. To CenturyLink's knowledge, this
7 was the first time that long distance provider call completion test data has been
8 submitted to federal or state regulators.

9
10 **Q. WHAT WAS THE RESULT OF THE TEST?**

11 A. In the Docket RR No. 187 test, CenturyLink conducted 7,482 test calls.
12 CenturyLink's completion rate was 98.3 percent. Of the 7,482 test calls, only 130
13 of its test calls did not receive a "tone" indicating the delivery of a completed call to
14 a RLEC Milliwatt test number. As agreed with the Nebraska testing group,
15 CenturyLink worked with the RLECs investigating the causes of the few apparent
16 call failures and continues to work with the Nebraska RLECs on any further issues
17 that they raise. CenturyLink believes that testing, such as that conducted in
18 Nebraska docket RR No. 187 -- testing that is voluntary, inclusive of all
19 stakeholders, transparent and open in its planning and execution, and overseen by a

⁵ A Milliwatt test consists of transmitting an analog signal at the frequency of 1004 Hz with the power level of 0 (zero) dBm. By definition, this is the equivalent of 1 mW (Milliwatt) continuous power dissipation. Although Milliwatt testing is sometimes used to measure line quality and transmission loss, the Nebraska test monitored for a 1.5 second minimum length tone to confirm that calls successfully completed to the RLEC-identified telephone numbers. In this context, a Milliwatt testing telephone number is a telephone number identified by a RLEC for the purpose of conducting a Milliwatt test.

1 neutral third party -- exemplifies the type of testing that allows for a fair and
2 credible evaluation of the scope and cause(s) of the rural call completion issue.
3 CenturyLink is currently working on the ATIS/NECA Joint National call
4 Completion testing.

5
6 **VI. ALLISON INVESTIGATION**

7 **Q. WHAT IS THE SPECIFIC CALL TERMINATION ISSUE EXPERIENCED BY**
8 **ALLISON?**

9 A. A complaint to the Iowa Utilities Board was filed in September of 2012, by Kathy
10 Miller of the Rehabilitation Center of Allison, Iowa. The complaint did not provide
11 specificity on the issues, but indicated that they had trouble with calls and faxes.
12 CenturyLink investigated and found that calls between the numbers we were able to
13 obtain for our investigation went through and had duration. There was no trouble
14 report opened with us by the CenturyLink customer regarding those calls. We
15 additionally reviewed the routing of the calls and performed test calls that
16 completed successfully. However, in the interest of the concerns raised in the report
17 to the Iowa Utilities Board Staff, out of an abundance of caution, we made a routing
18 change for the calls completing to NPA NXX 319 267, removing the underlying
19 carrier, and successfully tested for call completion with this change.

20
21 **Q. WHAT DOES THIS MEAN FOR THE ISSUES THAT THE**
22 **REHABILITATION CENTER OF ALLISON, IOWA RAISED?**

1 A. The Allison issues may have been related to equipment issues or process issues in
2 the use of their fax equipment.

3

4 Q. **HOW DO CALLS AND FAXES PROCESS IN THE LONG DISTANCE**
5 **NETWORK?**

6 A. Please see the attached Exhibit No. 1, which illustrates the following process:

7 An end user dials a 1 + a 10 digit telephone number of the called party. The end
8 user's local service provider's switch processes the call reading the 1 and is
9 programmed to see that as a long distance call. The local provider's switch also has
10 stored the customer's selected Preferred interexchange Carrier, the PIC, for carrying
11 the customer's long distance calls. The local service provider's switch then directs
12 that call to the trunks destined to the customer's PIC. That interexchange carrier
13 then receives the call and reads the first 6 digits after the 1 of the dialed digits to
14 determine the NPA NXX of the called TN, in order to set up the routing of the call
15 to that terminating NPA NXX. This is all determined in the long distance network.
16 The routing table is referenced to determine the path of the call for termination to
17 the terminating NPA NXX. Once the routing is known the call moves along the
18 routing path. For some calls the carriage is within the interexchange carrier's
19 network, sometimes referred to as their feature group network. For other calls an
20 underlying carrier is used to deliver the call.

21

22 Q. **HOW DOES CENTURYLINK HANDLE CALL COMPLETION ISSUES**
23 **WHEN THOSE ARE RAISED?**

1 A. CenturyLink has a standard process for addressing call completion complaints:

- 2 • Where there is an issue with the performance of a CenturyLink customer's long
3 distance service, and the customer contacts CenturyLink, CenturyLink opens a
4 trouble report ticket, the issue is identified and documented, and troubleshooting
5 takes place.
6
7 • If the issue is related to routing, the route path is reviewed and may be changed
8 and tested for efficacy to allow the customer's traffic to properly flow.
9
10 • If an underlying carrier is involved in the problem, it is removed from the path
11 (NPA/NXX) and a trouble report ticket is opened with the underlying carrier.
12 That carrier must conduct a root cause analysis, address the issue to resolution,
13 take corrective action, test its fix, notify CenturyLink, and test with CenturyLink
14 before CenturyLink may re-instate it to be used for processing calls and close the
15 trouble report ticket.
16
17 • The original customer issue is worked, its resolution tested and confirmed, and it
18 is closed with the customer.

19

20 **Q. WAS THAT PROCESS USED IN ADDRESSING THE REHABILITATION**
21 **CENTER OF ALLISON IOWA'S COMPLAINT?**

22 A. Yes, however, in the case of this complaint, no failed calls were found, only
23 completed calls with duration, and CenturyLink found that no trouble tickets had
24 been opened with us by the CenturyLink customer. CenturyLink went further and
25 did testing with successful results. Since an underlying carrier was used on the calls
26 that completed and had duration, out of an abundance of caution, and in the interest
27 of the concerns raised by the Iowa Utilities Board Staff, we removed the underlying
28 carrier.

29

1 **Q. WHY WAS THIS EXTRA STEP TAKEN TO REMOVE THE**
2 **UNDERLYING CARRIER IN THIS CASE WHEN THERE WERE NO**
3 **CALLS FOUND WHICH WERE FAILING TO COMPLETE?**

4 A. Although CenturyLink did not find the calls that were raised Allison's complaint,
5 CenturyLink took the extra step to remove the underlying carrier and further tested
6 in order to be more strongly assured that Allison's concerns were addressed.

7

8 **Q. WHY WAS NO TROUBLE TICKET OPENED WITH THE UNDERLYING**
9 **CARRIER WHEN THEY WERE REMOVED FROM THE ROUTING?**

10 A. Since there were no failed calls found, CenturyLink had no trouble ticket to advise
11 the underlying carrier of, so no notice to, or follow up actions with the underlying
12 carrier were needed.

13

14 **Q. WERE THERE FURTHER SPECIFIC CALL TERMINATION**
15 **ISSUES INVOLVING THE REHABILITATION CENTER OF**
16 **ALLISON?**

17 A. During the June 18, 2013 prehearing conference in this matter, Mr. Craig
18 Graziano from the Office of Consumer Advocate reported that the Rehabilitation
19 Center of Allison, Iowa was encountering additional call completion issues in the
20 weeks preceding the prehearing conference. These issues included:

- 21 1. Intermittent problems *receiving* faxes from the Shell Rock Clinic; and
22 2. Problems completing calls and faxes from Allison *to* the Shell Rock
23 Clinic.

1 The OCA testimony filed in this docket provides anecdotal evidence of the
2 problem.

3

4 **Q. HAS CENTURYLINK INVESTIGATED THESE COMPLAINTS?**

5 A. Yes. At the request of Judge Christensen, CenturyLink has worked with Mr.
6 Graziano and Kathy Miller from the Rehabilitation Center of Allison, Iowa to
7 investigate the issues and resolve any additional troubles. Because Mr. Graziano
8 did not have any call information such as the dates and times of the calls, and the
9 called and calling numbers, I contacted Ms. Miller for additional information. After
10 leaving messages for Ms. Miller, I was able to contact her on June 25, 2013. Ms.
11 Miller did not provide any additional information with regard to the issue of
12 *receiving* faxes from the Shell Rock Clinic or troubles making long-distance
13 telephone calls.

14

15 As was previously shown, the path of a long distance call is determined in the
16 originating long distance carrier's switch routing table. However, to determine the
17 specific path used for a call, one needs to know the called and calling numbers.
18 Without specific information related to the called and calling numbers and dates
19 and approximate times, it is difficult, if not impossible, for CenturyLink to
20 adequately investigate call completion issues. Ms. Miller did provide additional
21 information for the issues related to Allison's problems *sending* faxes to the Shell
22 Rock Clinic. Ms. Miller provided CenturyLink with the following information:

23

1 1. The nurses at the Rehabilitation Center of Allison reported to Ms.
2 Miller that on June 15, 16, & 17 they could not get faxes to complete to
3 the Shell Rock Clinic using the following telephone numbers:

4 a. Calling/Sending TN: 319.267.2688 (a Dumont Telephone local
5 number)

6 b. Called/Receiving TN: 319.885.6535 (A Shell Rock
7 Communications Inc. local number)

8 2. Ms. Miller also provided information on fax calls from Allison to
9 another Shell Rock Clinic telephone number. However, the Shell Rock
10 Clinic telephone number provided by Ms. Miller was a voice service
11 number that was not provisioned to receive fax calls, indicating that the
12 nurses' calls did not go through because they were attempting to send
13 faxes to a number that was not set up to receive faxes.

14
15 **Q. DID CENTURYLINK USE THIS INFORMATION TO INVESTIGATE THE**
16 **ISSUE?**

17 A. Yes. CenturyLink investigated the identified calls following its standard process
18 for investigation of long-distance, call-completion issues. A CenturyLink technician
19 opened a trouble ticket, on behalf of our customer, in order to investigate the issue
20 raised here. The technician reviewed the information provided, and examined call
21 records for the dates of June 15, 16 & 17, 2013 in order to locate the calls that are
22 reported as failing to complete. The technician located the calls and then
23 investigated those calls. It was determined that the routing of the calls was the issue.

1 The calls were both routed using an underlying carrier, Excel. Following
2 CenturyLink's underlying carrier process, and in order to make sure that calls will
3 go through for our customers, Excel was removed from the routing to the 319-885,
4 NPA NXX, and we continue to work with Excel as they investigate the issue.

5 After Excel was removed from the routing for NPA NXX 319-885, our technician
6 then tested the route, placing a test call, and verifying that the call completed
7 without issue. Our technician then contacted Ms Miller, who indicated that she had
8 asked within the office and there were no further fax issues to the Shell Rock
9 Clinic.

10
11 I would again note that it is extremely difficult to investigate issues regarding long-
12 distance call completion unless the customer is able to specify the date and
13 approximate time of the call as well as the called and calling numbers. In several
14 instances in this investigation, no information related to the called and calling
15 numbers has been provided and dates have only been approximate, making it
16 impossible to determine if a call on CenturyLink's network failed. CenturyLink has
17 requested that Ms. Miller at Allison try to log the details of the difficulties they are
18 experiencing and provide that information to me in a timely manner for
19 investigation. CenturyLink has provided Ms. Miller with my direct contact
20 information to facilitate this process. Again, no additional information regarding
21 *outgoing*, long-distance telephone calls between Allison and the Shell Rock Clinic
22 was reported by Ms. Miller to me during their June 25, 2013 conversation. And no
23 additional information regarding the *receipt* of faxes at the Allison Rehabilitation

1 Center from Shell Rock Clinic was reported by Ms. Miller to me at that time. As of
2 approximately 3:00 p.m. on July 15, 2013, I was able to follow up with Ms. Miller
3 on issues she raised with Mr. Graziano. Ms. Miller did supply some additional
4 information and CenturyLink has opened a new investigation into these matters.
5 Ms. Miller reported that she was communicating with Mr. Graziano on a daily
6 basis, but she has not relayed any of that information to CenturyLink until our
7 continued follow-up calls finally reached her. CenturyLink will continue to work
8 with Ms. Miller and Mr. Graziano to resolve any issues that are identified in the
9 future.

10
11 As an example of CenturyLink's willingness to work with Ms. Miller and the
12 Rehabilitation Center of Allison, Iowa, Wayne Johnson, State Regulatory Affairs
13 Director, went to Allison, Iowa on September 27, 2013. Mr. Johnson visited with
14 Kathy Miller about fax problems she had reported and determined that Allison was
15 having problems faxing from one of its buildings to another one of its buildings on
16 the same campus. These faxes never were transmitted over the long distance
17 network of any carrier and the problem only lasted one day. Both fax machines are
18 new machines. Ms. Miller indicated to Mr. Johnson that the local telecom provider
19 had been upgrading copper facilities in the area to fiber.

20
21 **Q. WHAT IS THE CURRENT STATUS OF CENTURYLINK CALL**
22 **COMPLETION ISSUES IN IOWA?**

23 A. In its Oct 30 Status Report in this docket the OCA stated:

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As OCA has reported at prehearing conferences in this and each of the other dockets, the complaining consumers are reporting that problems are not continuing to occur, or for the most part are not continuing to occur, and are being addressed when they do occur. In addition, insofar as OCA is aware, there has been only one recent new rural call completion complaint in Iowa. (October 30, 2013 OCA Status Report, par. 3).

8 **Q. DO YOU BELIEVE THE IOWA BOARD NEEDS TO TAKE ANY**
9 **FURTHER ACTION WITH REGARD TO CALL TERMINATION ISSUES?**

10 A. No. As I just discussed, the OCA has concluded that problems are not continuing to
11 occur and are being addressed when they do occur. Processes put into place by
12 CenturyLink and the new call completion rules adopted by the FCC should help to limit
13 future call completion issues. Additionally, if the customer raises the issues directly to
14 the CenturyLink repair team, or to me, as they occur, the issue can be addressed
15 expeditiously, and resolved directly by the CenturyLink personnel following our
16 process. Additionally the Board staff can also use this process and assist in directing
17 parties raising issues to us, so we can work through those with them directly.

18

19 **VII. SUMMARY/CONCLUSION**

20 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

21 A. CenturyLink is both a facilities-based provider of long distance services and an
22 incumbent local exchange services provider in both rural and non-rural areas. As
23 such, it has a keen interest in ensuring that its long distance customers have their
24 calls satisfactorily terminate as intended and that its local exchange customers, both
25 rural and non-rural, satisfactorily receive the calls that others place to them. In
26 order to promptly identify and address rural call completion issues, CenturyLink

1 has established an investigation and resolution process that can be initiated by its
2 customers and rural companies. CenturyLinks also closely monitors the underlying
3 carriers it uses. Prior to being introduced to CenturyLink call routes, an underlying
4 carrier must engage in extensive testing with CenturyLink. On an on-going basis
5 the performance of underlying carriers is monitored and to the extent problems are
6 detected, as I noted above, underlying carriers may be removed from certain call
7 routes.

8
9 The FCC has also addressed call completion issues. In its 2011 USF/ICC
10 Transformation Order the FCC took a number of steps which will have an impact
11 on call termination issues. In its November 8, 2013 Report and Order and Notice of
12 Further Proposed Rule Making, the FCC released additional rules related to rural
13 call completion.

14
15 To address Alison's specific concerns, CenturyLink has worked closely with
16 Allison to investigate call issues. As the OCA has now concluded, problems are not
17 continuing to occur, or for the most part are not continuing to occur, and are being
18 addressed when they do occur.

19
20 CenturyLink believes that processes it has put into place, as well as the new call
21 completion rules adopted by the FCC, should help to limit future call completion issues
22 and will continue to cooperate with, the FCC and state regulators as they gather

1 information necessary to assess the extent of the rural call completion issue, identify
2 the cause(s) of the issue and fashion appropriate responses to the issue.

3

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes it does.