
IOWA UTILITIES BOARD
Customer Service Section

Docket No.: FCU-2013-0009 (C-2013-0026)
Utility: Qwest Corporation d/b/a
CenturyLink QC, Bluetone
Communications LLC
File Date: March 13, 2013
Memo Date: June 4, 2013

TO: The Board

FROM: Tara Ganpat-Puffett, Larry Stevens, and Mary Whitman

SUBJECT: Call Completion Issues

I. Background

Based on the Iowa Utilities Board's (Board) Customer Service staff investigation regarding complaint C-2013-0026, dated May 23, 2013, and in staff's attached proposed resolution for this complaint, staff recommends that the Board, on its own motion, docket the complaint for further investigation of the telephone call completion problems under Iowa Code § 476.3(1). After Board staff issued its proposed resolution, the Consumer Advocate Division of the Department of Justice (Consumer Advocate) filed a "Joinder in Staff Request for Formal Proceeding" (Joinder).

As documented in several complaints filed with the Board, telephone call completion issues in rural areas have been increasing in frequency. Dropped telephone calls can present an important customer safety issue. As detailed in several complaint files involving similar call completion issues, some rural carriers believe that call completion problems are related to the use of least cost routers by intermediate or underlying providers.

The complainant described a situation in which his call to another party does not reflect his name and telephone number on the called party's identification display (Caller ID). This complaint is of particular interest because the complainant is the person who originated the call. (In all but two other call completion cases before the Board, the complainant has been the called party, not the calling party or originating party.) This is one issue customers are reporting in the growing number of call completion problems reported to the Board. Further investigation would be useful to learn more about the causes for this alleged call failure.

In the informal investigation, CenturyLink, the local service provider for the complainant, stated its underlying carrier used in the call routing was Bluetone.

Bluetone stated it used an underlying carrier, but wishes to have the identity of the vendor kept confidential due to a clause in its contract with that particular underlying carrier. Bluetone has since provided the name of its vendor in an e-mail sent to the Board staff. Staff provided Bluetone's response containing the carrier's name to Consumer Advocate, as required by Iowa Code § 475.A.4.

On May 13, 2013, Bluetone submitted a request for confidential treatment to Board staff by email. That request does not comply with the Board's requirements in rule 199 IAC 1.9. Initiating a formal proceeding would create a docket in which Bluetone could file a proper request for confidential treatment of the identity of its vendor.

Iowa Code Section 476.3(1) provides, that if, "the board determines the public utility's response [to a complaint] is inadequate and there appears to be any reasonable ground for investigating the complaint, the board shall promptly initiate a formal proceeding."

In its May 24, 2013, Joinder, Consumer Advocate concurs with staff that further investigation is needed regarding the roles and responsibilities of the various carriers, including the carrier used by Bluetone, and to provide an opportunity for Bluetone to request confidential treatment regarding the identity of its underlying carrier should Bluetone elect to do so. Consumer Advocate also noted such a docket would give other parties an opportunity to resist such a request and that further investigation is needed regarding call completion problems in order to reach an understanding of how to prevent the problems before they occur.

II. Recommendation

Further investigation in this case is appropriate for examination of the call completion issues, including the roles and responsibilities that the various carriers have regarding the call failures alleged in this complaint. Staff recommends that the Board initiate a formal proceeding to be assigned to the Board's administrative law judge.

RECOMMENDATION APPROVED

IOWA UTILITIES BOARD

/tgp

/s/ Elizabeth S. Jacobs 6-7-13
Date

/s/ Swati A. Dandekar 6-7-13
Date

/s/ Nick Wagner 6/10/13
Date



GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

ELIZABETH S. JACOBS, CHAIR
SWATI A. DANDEKAR, BOARD MEMBER
VACANT, BOARD MEMBER

May 23, 2013
File No. C-2013-0026
PROPOSED RESOLUTION

Mr. Douglas Pals
2080 NW 144th Street
Clive, IA 50325

Dear Mr. Pals:

On March 13, 2013, the Iowa Utilities Board (IUB or Board) received your complaint regarding rural call completion issues. Staff forwarded your complaint to Qwest Corporation d/b/a CenturyLink QC (CenturyLink). Staff received a response from CenturyLink on April 3 (confidential) and April 10, 2013, (public version). Also, responses from Bluetone Communications LLC, (Bluetone) were received on April 24, 2013, and May 10, 2013, (confidential information).

Responses from CenturyLink and Bluetone were forwarded to you and the Office of Consumer Advocate. However, staff did not forward the confidential information from Bluetone. Below is the summary of your complaint, CenturyLink and Bluetone's responses, and the IUB staff findings.

Complaint:

Mr. Pals, your complaint states on February 12, 2013, at 2 p.m. you called from [redacted]. The called party did not answer because the caller ID showed telephone number [redacted] and the name on the caller ID showed as "BIDAXIS." You stated the called party listened to the voice mail message you had left and realized that it was you calling, so she returned your call. Your complaint states you then performed a few test calls and one call worked fine, and the other had a problem connecting, but did not have the same incorrect caller ID information. You noted you have had this number with Qwest (now CenturyLink) since 1999 and only recently you changed your calling plan to unlimited nationwide calling and started using your landline phone to make long distance calls. You stated you are unsure if this new unlimited arrangement is the potential cause of the problem and if CenturyLink or a carrier they were using is routing calls to avoid paying for them to be completed. In your complaint, you stated you spoke with a CenturyLink technician who was familiar with the problem and with the caller ID name. You stated you told the technician that you were going to file this complaint with the IUB after you completed your phone call with him. You stated this matter seems suspicious and would like to see the rural call completion

problems resolved. Further, you would like for the companies and carriers responsible to pay appropriate fines and fees and for them to be barred from conducting business.

CenturyLink Response:

CenturyLink stated it investigated this problem based on the following information you provided:

Issue: The called party did not answer the calls because the caller ID showed "BIDAXIS [REDACTED]"

- Calling telephone number (TN): [REDACTED] CenturyLink's customer
- Called TN: [REDACTED] West Liberty Telephone Company local TN
- February 12, 2013, at 2 p.m., Central Standard Time (CST), and again at 2:50 p.m., CST

CenturyLink stated the established CenturyLink process to investigate this issue was followed. This process involved the CenturyLink's technician creating a trouble ticket to investigate the issue on your behalf. The technician worked to troubleshoot the issue. Also, the technician determined that the routing of the calls was the issue. In this matter, the routing for the calls used Bluetone as the underlying carrier. CenturyLink's technician removed the underlying carrier from the routing to the [REDACTED] NPA/NXX, and opened a ticket with the underlying carrier. CenturyLink stated its technician contacted you to make a test call to the called TN, but it was unable to reach you. A voice mail was left for you to call CenturyLink back for the re-testing between the TNs involved. CenturyLink stated based on its testing the issue is resolved.

Bluetone Response:

Bluetone stated the destination number was blocked to allow CenturyLink to route the calls to another provider while Bluetone's technicians worked to troubleshoot the problem. Bluetone stated this change was completed within two hours of receiving the initial complaint from CenturyLink. Bluetone stated it reviewed call records and confirmed that the correct calling party number [REDACTED] was received from CenturyLink and forwarded along correctly to Bluetone's downstream provider. Test calls were completed over Bluetone's network, but testing did not duplicate the calling party number as (CPN) BIDAXIS [REDACTED]. According to Bluetone, this single test call received no name or number as confirmed by the end user (called party). Subsequent test calls completed to the end user confirmed that the calling party number was correct. Bluetone stated as a precautionary measure, Bluetone's downstream provider was removed from routing. Also, routing adjustments remained in place to allow CenturyLink to route the calls to an alternate provider.

Staff Findings:

Based on staff review, the testing performed by CenturyLink indicated the problem was with Bluetone, CenturyLink's underlying carrier. Staff finds once CenturyLink removed Bluetone from the routing and performed test calls, the calls completed without issue. Staff notes CenturyLink attempted to reach you to perform additional test calls, but was unable to reach you. CenturyLink stated it resolved the issue by removing Bluetone from the routing.

According to this record, Bluetone stated its investigation confirmed that the correct calling party number [redacted] was received from CenturyLink and forwarded along correctly to Bluetone's downstream provider. Also, Bluetone stated the test call did not duplicate the information caller ID name and number you provided (BIDAXIS, [redacted]). Furthermore, Bluetone noted the single test call received no name or number.

Staff notes that Bluetone stated the call was forwarded to another provider, but Bluetone asked that IUB staff keep the identity of the provider confidential.

Staff Recommendations:

Your complaint states that your call to another party did not reflect your name and telephone number. This is an issue customers are reporting in the growing number of call completion problems reported to the Board. Some rural carriers believe that call completion problems relate to the use of least cost routers as intermediate or underlying providers. In this case, Bluetone provided the name of its vendor to the Board staff but stated that a confidentiality clause in its contract with the underlying carrier prevents this information to be public.

Staff has not yet distributed the response containing the vendor's name. Bluetone submitted a request for confidential treatment to Board staff by email on May 13, 2013. That request does not comply with the Board's requirements in rule 199 IAC 1.9. Initiating a formal proceeding would create a docket in which Bluetone could file a proper request for confidential treatment of the identity of its vendor, allowing the investigation to proceed. Staff will recommend that the Board initiate a formal proceeding on its own motion.

If anyone disagrees with staff's proposed resolution you have 14 days to submit your response. To do so, please send a copy of your response to our office, CenturyLink, Bluetone, and the Office of Consumer Advocate. Please refer to the C-file number listed at the top of this letter

Mr. Pals, thank you for taking time to bring this matter to our attention. If we may be of assistance in the future, please do not hesitate to contact us. Our toll-free number is

Sincerely,

/s/

Tara Ganpat-Puffett
Utility Analyst II
Customer Services

cc: CenturyLink, 930 15th St, 11th Floor, Denver, CO 80202
Bluetone Communications LLC, 1173 Pittsford-Victor Road, Suite 110, Pittsford,
NY 14534
Office of Consumer Advocate, 1375 E. Court Avenue, RM 63, Des Moines, Iowa
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