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FILED WITH
Executive Secretary

March 10, 2016

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE:	
COMPLAINT OF HORN MEMORIAL HOSPITAL	DOCKET NO. FCU-2014-0014 (C-2014-0072)

STIPULATION OF FACTS

Pursuant to the order of the Administrative Law Judge issued in this docket on January 7, 2016, the Office of Consumer Advocate (“OCA”) hereby files this Stipulation of Facts on behalf of itself, Long Lines, Metro, Inc. (“Long Lines”), Frontier Communications of America, Inc. (“Frontier”), Impact Telecom, (“Impact”), and Level 3 Communications, LLC (“Level 3”). The parties have agreed to the following facts in this docket:

General Facts

1. On June 6, 2014, Michelle Weber filed a complaint on behalf of Horn Memorial Hospital (“Horn Memorial”) regarding long-distance calls from Horn Memorial Hospital in Ida Grove, Iowa to Horn Physicians Clinic in Mapleton, Iowa that were failing to complete during the days of June 3-6, 2014.
2. It is not known with certainty which Horn Memorial phone lines were used to make the calls in question, but it is believed that the calls originated from { } and dialed number { }. The originating number { } was used in the original complaint and to investigate the calls in question. However, none of the records of the underlying telecommunications carriers involved in this complaint identify a call originating from { } dialing number { } during the relevant time period. Given this fact, the parties are not able to determine the underlying facts in this complaint.
3. Although the exact facts for the reported calls has not been verified, the following telecommunications companies were presumed to be involved in the handling of the calls and have participated in the investigation of the complaint:
 - a. Long Lines – the local exchange carrier for both Horn Memorial Hospital and Horn Physicians Clinic;

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- b. Frontier –Horn Memorial’s long distance carrier;
- c. Impact – an intermediate long-distance carrier;
- d. Level 3 – an intermediate long-distance carrier; and
- e. Iowa Network Services (“INS”) – the provider of centralized equal access service throughout the state.

Long Lines’ Investigation

4. Long Lines owns 712-881 NPA/NXX in conjunction with Mapleton Communications.
5. Horn Memorial utilizes the number { [REDACTED] } for Horn Physicians Clinic in Mapleton, Iowa, and is a Mapleton Communications customer.
6. Long Lines does not block incoming calls (local or long-distance).
7. Long Lines utilizes INS as a terminating tandem provider.
8. Long Lines controls the outgoing call routing from { [REDACTED] }, but does not directly track the incoming calls (unless a call trace is initiated on a particular number).
9. No call trace was in place on this number during the time period addressed in this complaint.

INS’ Investigation

10. INS could not find records for any calls matching those described in the complaint. INS stated this would indicate that the calls were never offered by any long-distance carrier to the INS terminating tandem for call completion.
11. INS researched all long-distance calls terminating to the telephone number in question, { [REDACTED] }, for the dates June 3 to 6, 2014, and found that 147 long-distance calls were completed to that telephone number successfully from other points of origination. Of the 147 calls, INS three calls from Horn Memorial were completed to { [REDACTED] }, that originated from a telephone line at Horn Memorial, { [REDACTED] }.
12. Based its investigation, INS concluded that the problem was with the long-distance carrier.

Frontier’s Investigation

13. At the time of the calls in question, Frontier used Impact, Verizon, and AT&T as intermediate carriers to route the calls from Horn Memorial.
14. Frontier could not find a trouble ticket for { [REDACTED] }, concerning this issue.
15. Based on its initial investigation, Frontier suspected the problems occurred during Impact’s routing of the call. However, because the calls were more than 24 hours past, Frontier could not open a repair ticket with Impact.
16. On June 10, 2014, Frontier assisted Ms. Weber in making some test calls. Some of the test calls were routed through Impact and some were routed through Verizon. All test calls that day were completed.

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17. However, Frontier suspected Impact was the issue and temporarily removed Impact from the routing.
18. Frontier added Horn Memorial's fax lines, { [REDACTED] } and { [REDACTED] }, to a premium route.
19. On June 11, 2014, Frontier put Impact back in the call routing and assisted Ms. Weber in making more test calls. The test calls by Impact failed to complete. Frontier opened a repair ticket with Impact and removed it from the route.
20. Frontier received an update from Impact stating no trouble was found, so Frontier permanently removed it from the route.

Impact's Investigation

21. Impact has no records of any call completion issues for calls made on June 3-6, 2014 originating from { [REDACTED] } and dialing { [REDACTED] }.
22. On June 11, 2014, Frontier opened a trouble ticket with Impact (Impact Ticket # 409823) regarding the test calls made on June 10, 2014. Impact does not place restriction on timing for opening tickets. Impact maintains Call Details Records ("CDR") lookup ability for 7 years and detailed call signaling information (SIP traces) for greater than 30 days. All tickets that are opened get the width of research available at the time of the ticket creation. The trouble ticket stated that the troubled calls originated from { [REDACTED] } and terminated at { [REDACTED] }. Impact's investigation did not show any CDRs matching the originating number of { [REDACTED] } and the investigation did not show any call failure on its network. Therefore, Impact cannot verify that it actually received the test calls from Frontier. However, in searching for *all* calls coming from Frontier on June 10, 2014 (Impact normalizes all call detail research to Greenwich Mean Time (GMT)), Impact located calls made by Frontier originating from { [REDACTED] }. In all call examples, however, Impact either terminated the call appropriately, provided a 503 notice to route advance (route to different carrier), or was asked to disconnect the call by Frontier prior to Impact connecting the call to another carrier.
23. That same day, on June 11, 2014, Impact contacted Level 3 regarding the calls made by Frontier originating from { [REDACTED] }. Level 3 is the underlying carrier to whom Impact routed the calls. On June 12, 2014, Impact received an email from Level 3 that reported that Level 3 was experiencing problems with its underlying carrier and that routing changes were made to correct the issue. The email specifically references Impact's trouble ticket #409823. (Impact manages all customer trouble tickets utilizing the Impact internal ticket number only. Ticket #8011188 is Level 3's provided number and used only as information given by Level 3.) Following correction of the problem, Impact tested the route to verify that the Level 3 problems were resolved and Impact placed Level 3, a tier 1 provider, back into Impact's routing.
24. On May 28, 2015, as part of a collaborative effort with Level 3, Impact sent the CDRs for ALL calls terminating to { [REDACTED] } that Impact received from Frontier and which Impact subsequently routed to Level 3 from June 3 through June 10, 2014. Level 3 states that all calls completed to the { [REDACTED] } with 100% Answer Seizure Ratio

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(“ASR”). However, the CDRs indicate that when Impact routed the calls with the origination number of { } to Level 3, there were many calls with eight seconds of PDD (post dial delay) and that none of the calls were completed. Because of the PDD, the CDRs show that Impact handed the call back to Frontier in its capacity as an intermediate provider for Frontier to route advance the calls to another carrier using a SIP release code 503.

Level 3’s Investigation

25. Level 3 examined call records from June 1 through June 6, 2014, and found no calls originating from { } and terminating to { }. Level 3 found 94 calls from other numbers terminating to { } with a 100 percent Answer Seizure Ratio rate for calls made from June 1 through June 6, 2014.
26. During Level 3’s investigation of the calls, Level 3 located a reference to Impact’s trouble ticket number T409823 in notes on Level 3 trouble ticket 8011188. However, Level 3’s records indicate that ticket number 8011188, which Impact opened with Level 3, addresses an unrelated issue involving telemetry equipment in New Jersey. Without the information from a trouble ticket, Level 3 was unable to find the call records relating to the uncompleted call and Level 3 was unable to perform any testing.
27. Based on Level 3’s investigation, Level 3 stated that it appeared that the calls in question were not delivered to or carried on the Level 3 network. Level 3 requested additional detailed information from Impact to allow additional investigation.
28. E-mails provided to Level 3 had ticket numbers and jurisdictional information redacted by Impact (other than a reference to Denver that appears unrelated to this case), so no further investigation was possible.

Conclusions

29. Complainant was uncertain which of Horn Memorial’s telephone numbers was the originating call number. Therefore, it is unknown who handled the calls after Frontier handed the calls to an intermediate carrier. Given the confusion surrounding the origination number, the underlying facts are not able to be determined in this investigation.
30. Frontier is complying with FCC regulations regarding call completion. The FCC excluded intermediate carriers, such as Impact and Level 3, from requirements of its call completion regulations. Local exchange carriers, such as Long Lines, and equal access providers, such as INS, were not included in the FCC’s consideration of call completion problems as the main source identified for the problems was long-distance routing.

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Respectfully submitted,

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