

January 26, 2014

Tom Sturm



Re: Call Completion

Dear Mr. Sturm

Thank you for visiting my office on Monday September 30 and expressing your complaint with me about calls not being received. I do understand your frustration and sympathize with your complaint. We understand that you run a business and that when calls are not completed you suffer the consequence. We believe it is not only a matter of business but a safety issue as well.

Our conversation has been on my mind since and I know that what I explained did not help to ease the frustration you are feeling, so I thought it might be helpful to provide you with more information to understand the problem and see what your co-op and its associations have been doing behind the scenes. Not to play down your specific issue, it is a major concern for all rural carriers across the United States. In fact, if it is not fixed, it will help to further the demise of all rural carriers and in the end hurt the rural communities across this nation that depend on the local service provider.

Hamilton County Telephone Co-op believes that you do deserve to receive your calls, just like you can when you make a call. At times we think the problem has gone away as we do not receive any complaints ...this has happened several times, then, it starts all over again. It is important that you call us when you experience the problem. I know this is a burden on you but we have no way to know that it is going on without your help. . In our conversation, I asked you to file a complaint with the FCC (see link information below). When you file a complaint it needs to be on the long distance company that is trying to call you and should be reported each time that happens...Most consumers would not participate in such an endeavor, they consider it is someone else's responsibility, but I hope that as a member of the co-op, you would be one that would.

Hamilton County Telephone Co-op has experienced this for approx. 3 years now and has reported this to our associations for help. In fact our comments were the first comments on a complaint to the commission in 2011(as shown in attached). I have also included some additional information on the problem and how they are being addressed at the FCC. Including the "FCC enforcement advisory", brochure "Calls not getting through?", 2011 history of "call routing/ termination Issues and 2012 FCC Declaratory Ruling, the Washington Report and the Capital Connection.

In my opinion, it appears that in the transitioning of POTS (Plain old telephone service) to IP (data) we are experiencing a gap of concern for quality and reliability as the next generation tends to lean to more data than voice communications. How many times do you experience a dropped call on your cell phone? No one complains, right? Because that is just how it is? And that is the expectation we have come to realize from cell phone usage.

Long Distance Carriers give the impression that they don't care to fix the problem because it actually saves them money. How is that? Normally when a call completes to a rural company there is a charge imposed to the long distance carrier to access the rural telephone company's network. Usually this rate is higher than that of major carriers. So when a call does not complete to a rural telephone company they are not charged the higher rate. However those rates from rural telephone companies are starting to diminish as mandated by the reform set forth by the FCC. In fact the access rate is on a glide path to zero. So why is it not getting any better? It's because there is no enforcement of the rules and responsibilities for reliable service. Everyone wants affordable, but the sacrifice is reliability.

On Three separate occasions, last year alone, Hamilton County Telephone Co-op along with Wabash Telephone have reached out together to Congressman Shimkus and explained our concern regarding the call completion. He has expressed great concern as well, but knows that the FCC through its current transformation process of the Universal Service Fund, and we know with the problems that Congress is facing that these concerns are not on the front burner.

For local Carriers like Hamilton County Telephone Co-op, it is very frustrating as we are blamed for something we cannot control. . . Think of it this way, someone tries to call you, they pick up the phone, they dial out from their local carrier, it is then sent to a long distance carrier, who in turns processes the call themselves or sends it to a third party vendor ,who, to make any money, has to send it the cheapest way possible and it gets hung in a loop because it cannot find the access rate it will accept, the call then dies and the receiving party (nor the local telephone company) ever knows that a call was coming or it allows the connection to die before the caller ID information can be sent, even if the receiver does pick up, they hear nothing on the line or it is garbled as the call has already been allowed to expire. Sometimes the caller may hear a busy signal, which is not being generated from the receiving office. So the call from the start never goes anywhere.

As per our conversation you stated that you don't have trouble calling out. The reason for this is, the originating company's has the responsibility (Hamilton County Telephone Co-op) to make sure a call is completed. If a person makes a call and it does not go through, that person should call their phone company to report the call did not go through. The calling company has the responsibility to report and respond to the trouble and if necessary fix the problem, then test to make sure it works every time. That is why you do not have that issue when calling out.

There are dial around solutions that you could provide to customers, but that only works if you have someone who calls you repeatedly because it circumvents the caller's current long distance provider by choosing another. It has worked for suppliers that repeatedly call their customers. But if you have customers calling from all over the country this band aid will not work. We appreciate your support but realize you have a business to run and thus need to protect that business.

Mr. Sturm you deserve a better answer than this... and I apologize that there is not a simple solution... we are working through the associations and with other companies so our voice can be heard in Washington. We eagerly wait for a resolve. It is in the hands of the FCC which is the governing body for communications. **We are however working on another solution that may be able to help your issue. We are installing equipment and will be testing it over the next two months but it won't be available for approx. 90 days. If this solution will work we will notify you of this option for you to consider.**

In the meantime, please review the attached documentation and see the bottom of the brochure attached...I have highlighted the basic points. Contact the FCC at <http://www.fcc.gov/encyclopedia/problems-long-distance-or-wireless-calling-rural-areas> or www.fcc.gov/complaints and file an informal complaint, on the Long distance carrier used by the calling party.

As a business owner I know you have to do what's best for your business... either way we will continue to fight this fight to get a resolve.

If I can ever be of any assistance to you please let me know.

Sincerely,

HAMILTON COUNTY TELEPHONE CO. OP



Kevin Pyle
General Manager/EVP

Cc:file/call Termination Issues/Tom Sturm 1:27.2014