

FCC Announces May 15th Deadline for Rural Call Completion Intermediate Provider Registration

April 26, 2019

Continuing to implement the FCC's rules to improve service to rural areas, the FCC [announced](#) that all "intermediate providers" (i.e., entities that carry, but do not originate, long distance traffic) must register with the agency by **May 15, 2019**. The registration requirement stems from rules adopted by the FCC [last summer](#) designed to increase transparency and accountability in the rural call completion process and avoid dropped calls. Intermediate providers must register with the FCC by the deadline in order to continue to receive traffic from carriers that originate long distance calls (known as "covered providers"). The registration requirement applies to all intermediate carriers, not just ones completing calls to rural areas. Covered providers will be prohibited from transmitting their traffic to unregistered intermediate providers beginning on **August 13, 2019** (90 days after the registration deadline). Intermediate providers must register with the FCC [online](#) and the registration instructions may be found [here](#).

The FCC defines the term "intermediate provider" broadly to cover any entity that enters into a business arrangement with a covered provider or another intermediate provider to transmit voice traffic to/from end users using numbers provided under the North American Numbering Plan. However, the FCC [recently clarified](#) that the registration requirement does not apply to non-U.S. intermediate providers on calls terminating outside the United States. As part of the registration process, intermediate providers are required to provide certain corporate and rural call completion information, including:

1. The intermediate provider's business names and primary address;
2. The names, telephone numbers, email addresses, and business addresses of the intermediate provider's regulatory contact and/or designated agent for service of process;
3. All business names that the intermediate provider has used in the past;
4. The states in which the intermediate provider offers service;
5. The name, title, business address, telephone number, and email address of at least one person responsible at the intermediate provider for addressing rural call completion issues, and;
6. The names, business address, and business telephone numbers for an executive leadership contact, such as the chief executive officer or persons performing an equivalent function, who directs or manages the entity.

Except for the information in category 6, all of the above registration information will be made

publicly available by the FCC through the registration website. Intermediate providers that fail to register with the FCC could face enforcement action and may no longer carry covered provider traffic.

In addition to the registration requirement, intermediate providers soon will be subject to service quality standards adopted by the FCC in [March 2019](#). The new standards cover three broad prongs: (i) a general duty to complete calls; (ii) monitoring of rural call completion performance; and (iii) ensuring other intermediate providers in a call delivery path register with the FCC. As a result, intermediate providers will be required to ensure not only that they are registered with the FCC, but also that any other intermediate providers to which they hand off calls are registered with the FCC. The new service quality standards still must be published in the Federal Register to take effect, with publication likely occurring this summer.

The attorneys in Kelley Drye & Warren's Communications Practice Group are experienced with rural call completion issues and are able to assist clients with registrations, contract negotiations, and service quality standard compliance related to rural call completion. For more information regarding this client advisory, please contact your usual Kelley Drye attorney or any member of the Communications Practice Group. For more information on the Communications Practice Group, please click [here](#).