

## New Rural Call Completion Deadlines Established

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We now know that the Rural Call Completion rules the Federal Communications Commission adopted in late 2013, and modified in November 2014, have taken effect, with obligations commencing as soon as April 1, 2015. The rules require certain originating long-distance providers to record, retain, and report information on delivery of long distance calls to rural local exchange carriers ("LECs") individually and to nonrural LECs in the aggregate. The holdup on the rules taking effect was Office of Management and Budget review of the data collection requirements.

Yesterday, that hurdle was cleared as a result of the Commission's Federal Register publication of the effective date. Simultaneously, the FCC's Wireline Competition Bureau announced in a Public Notice that, as of April 1, 2015, long-distance voice service providers that qualify as "covered providers" under the new rules must begin recording and retaining data required for Rural Call Completion reporting. Those long-distance voice service providers that have more than 100,000 domestic retail subscriber lines but do not qualify as "covered providers" must file a one-time letter by April 1, 2015, in WC Docket No. 13-39. The letter must explain that they do not make the initial long-distance call path choice for more than 100,000 long-distance voice service subscriber lines and identify the long-distance provider or providers to which they hand off their end-user customers' calls. Finally, the Bureau also explained that the first Form 480 Rural Call Completion Reports that affected providers must file will be for the calendar quarter consisting of April, May, and June 2015. Those Reports must be filed by August 1, 2015. To assist affected providers in filing their Reports, the FCC released yesterday a Rural Call Completion Report Guide.