

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109

To: The Commission, *en banc*

**ASSOCIATION OF TELESERVICES INTERNATIONAL, INC.  
COMMENTS ON SECTION XV (PHANTOM TRAFFIC)**

THE ASSOCIATION OF TELESERVICES INTERNATIONAL, INC. (ATSI), by its President, by its Chairman of the Government Relations Committee of the Board of Directors, and by its attorney, respectfully submits its comments to the Federal Communications Commission in response to the “phantom” traffic portion of Section XV of the Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking (the “NPRM”) in the captioned proceedings, FCC 11-13, adopted February 8, 2011, released February 9, 2011, and published at 76 Fed. Reg. 11632 (March 2, 2011). As explained below, ATSI strongly supports the rules proposed by the Commission to combat “phantom” traffic, as far as they go, but respectfully submits that the

Commission also should adopt similar regulations governing the mandatory transmission of data elements in the signaling information related to redirected calls.

As its comments in response to the NPRM, ATSI respectfully states:

#### Introduction and Background

The NPRM is the latest in a series of orders by the Commission to address distribution-side issues arising out of the Universal Service Fund, including related issues concerning inter-carrier compensation (ICC) and the National Broadband Plan (NBP). In Section XV of the NPRM, the Commission has requested separate comments on issues concerning so-called “phantom” traffic (NPRM at ¶¶620-634), *i.e.*, traffic delivered to terminating carriers that does not include sufficient or sufficiently accurate “overhead” information to enable the terminating carrier to identify the originating service provider, and to properly bill for the network usage by the delivered traffic. (*See generally, e.g., id.* at ¶¶621-622). The Commission concludes that delivering traffic without sufficient and sufficiently accurate information to enable the proper billing of intercarrier compensation is inconsistent with the public interest, and that new rules are needed to reduce or eliminate this problem. (*Id.* at ¶624).

To this end, the Commission proposes, in summary: (1) to require that a calling party’s telephone number be provided by the originating service provider, as well as the charge number when different from the calling party’s number, and (2) to prohibit service providers in the chain from origination to termination from stripping or altering call signaling information (*e.g.*, SS7 signaling information, MF signaling, such as ANI, and IP signaling such as signaling within SIP sessions) from transmissions. (*Id., e.g.*, at ¶626 & n. 965). The Commission is particularly concerned that any new rules it adopts be forward looking, and it inquires whether its proposals will ensure complete and accurate passing of call signaling information as voice traffic on the net-

work migrates increasingly to interconnected VoIP. (*Id.* at ¶627). It also proposes to apply the requirements to intrastate traffic as well as to interstate traffic, in order to maximize the effectiveness of the new rules. (*Id.* at ¶629).

As noted earlier, in addition to requiring the transmission of the calling party number (CPN), the proposed rules also require the transmission of the charge number (CN), when it differs from the CPN. (*Id.* at ¶631). Such a situation arises, among other circumstances, when the called party has activated a call forwarding service, either for all calls (call forward - variable “CFV”) or for calls when the called number is busy (call forward – busy line “CFBL”) or the called party does not answer or is otherwise not available (call forward – no answer or not available “CFNA”). As explained below, this class of traffic, generally referred to as “redirected” calls, is of particular importance to ATSI members and the vital services they provide to the public.

The Commission also invites comments on proposals to expand the scope of rules beyond call signaling, and it specifically invites comment on any other actions the Commission should take related to unbillable traffic and signaling requirements. (*Id.* at ¶634).

#### Identity and Interest of ATSI

ATSI ([www.atsi.org](http://www.atsi.org)) is an international trade association established in 1942 by and for entrepreneurs in the Telephone Answering Services (TAS) business. Referred to as Private Sector Critical Response Centers (PSCRCs) in the modern era, inbound contact centers operated by ATSI members typically are small, locally owned and operated businesses providing a wide variety of human communications services within their local communities. The gross revenues of PSCRCs average on the order of \$550,000 annually, of which approximately 45% go to direct

payroll expenses for their employees. ATSI members are domestic companies; they do not employ or operate offshore call centers.

Entrepreneurial in their approach to business issues, ATSI members offer innovative human solutions to business communications problems and provide essential response services in disaster situations. PSCRCs serve over 1.4 million professional, commercial, not-for-profit, governmental agencies, and local emergency respondent clients, including doctors; emergency response centers; public utilities; public safety offices; local, state, and federal government offices; rape and suicide crisis centers; and Red Cross emergency centers. PSCRC agents, US citizen employees, assist neighbors in some 3.6 billion inbound call transactions annually.<sup>1</sup>

Calls to PSCRCs in disaster or other emergency situations generally are “redirected” calls. For example, a doctor’s office employing a PSCRC will forward or “redirect” the patients’ calls received outside of office hours from the doctor’s office to the PSCRC for answering. The patient calls the doctor’s normal office number as usual, and the call in turn is forwarded to the PSCRC for answering and responding to the patient’s needs.

In order to respond to the patient’s call as efficiently and as comprehensively as possible, it is vital that full information concerning the redirected call be delivered to the PSCRC along with the call. This information not only enables the PSCRC to identify the doctor called by the patient, but it also identifies other circumstances surrounding the call that enable the PSCRC to access information in a data base to expedite and streamline the PSCRC’s response function. For a PSCRC, accuracy and speed in its response to calls it answers for clients can mean the difference between life and death, much as it can mean the difference between life and death in the case of calls to a 9-1-1 PSAP.

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<sup>1</sup> More information concerning PSCRCs in the United States is set forth in the brochure attached hereto.

CPN and CN are part of the data relied upon by the PSCRC when those data are available in the signaling information delivered to the PSCRC's service provider. The PSCRC, in turn, contracts with its service provider to pass through the data to the PSCRC, commonly via the data channel for ISDN circuits.

Currently, however, these data are not always delivered to the PSCRC's service provider, most likely for the same reasons and under similar circumstances that result in "phantom" traffic being delivered to terminating carriers. In turn, the absence of these data in a portion of the calls received by PSCRCs limits both the speed and efficiency of PSCRC services, as well as the PSCRC's ability to develop innovative and technologically advanced services for their clients. For these reasons, ATSI strongly supports the rules proposed by the Commission to combat "phantom" traffic, as far as they go.

ATSI respectfully submits, however, that the Commission should go further, and should apply the same mandatory carriage requirements to *all* signaling information fields that relate to redirected calls. At a minimum, these fields include (1) the original calling number (CPN) field; (2) the redirecting number field (*i.e.*, the original called number, usually the CN on a redirected call); (3) the redirecting reason code field; and (4) the forwarding number field.

The ability of entities such as PSCRCs to develop and implement technologically innovative and advanced services for their customers depends in large part upon the accuracy and completeness of the signaling and other "overhead" information transmitted with calls through the network. Obviously, unless that information is transmitted completely and accurately to the PSCRC service provider in the first instance, the service provider cannot possibly pass it along to the PSCRC. Therefore, ATSI urges the Commission to promptly finalize its proposed rules in Section XV of the NPRM dealing with "phantom" traffic, but also urges the Commission to ap-

ply the same mandatory carriage requirements to all data fields in the signaling information that relate to redirected calls.

Respectfully submitted,

ASSOCIATION OF TELESERVICES  
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March 31, 2011

The United States at Night  
as seen from space



Image by the NOAA's National Geophysical Data Center, Defense Meteorological Satellite Program

***In the dark silence of the night...***



2,746 Private Sector Critical Response Centers (PSCRC) answer America's critical calls around the clock.

**...there are a few lights forever burning ...**

**...a few voices never stilled.**



## AMERICA'S PRIVATE SECTOR CRITICAL RESPONSE CENTERS

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*In the dark silence of the night, there are a few lights forever burning – a few voices never stilled.*

*Those lights are your community's Private Sector Critical Response Centers. The voices are those of 40,000 skilled agents.*

*For nearly 100 years, PSCRC agents have faithfully answered America's critical calls around the clock, every day and night. Their caring voices bring a feeling of security, whatever the need or the hour.*

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9-1-1 centers are well understood by the public to be government entities handling calls from the public for first responders – fire, police and ambulance.

Yet when trouble strikes, 9-1-1 is not the only telephone number Americans dial for assistance. Citizens understand less about how other types of emergency calls are handled – and by whom.

Many of the critical elements of America's vital infrastructure – government, not-for-profit, professional, healthcare and commercial entities – contract with America's Private Sector Critical Response Centers (PSCRC) to handle emergency calls.

PSCRCs are local businesses, and most have less than 25 employees. Many are woman-owned small businesses, often owned by the same family for multiple generations. Some are operated by not-for-profit organizations such as medical societies and charity hospitals.

The business requires an extremely high level of technical knowledge and competence, especially in the operations and functionality of the Public

Switched Telephone Network (PSTN) and the Internet. Today's PSCRC physical plant is impressive in its disaster readiness and notable for the extensive technology required to interface both voice and data communications with hundreds of subscribers.

Owners and senior managers are experts at analyzing, planning and implementing routine, critical and emergency communications protocols.

PSCRC agents undergo extensive screening to gain entry-level positions and must complete intensive training in technical and soft skills, followed by routine evaluations – typically on a bi-weekly basis.

As they handle emergency calls, agents evaluate each contact and execute sophisticated relay protocols that often vary as circumstances develop. Callers may be routed via the PSTN or Internet directly to client personnel or a contact record may be created for subsequent dispatch, escalation and broadcast.

The technology and public networks that carry calls and data between subscribers and PSCRC agents have changed dramatically since the early 20th century. People haven't. Private Sector Critical Response Centers remain critical to callers in distress.

PSCRC agents provide essential services for 21st century Americans.

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- . **2,746** PSCRCs across the 50 United States
  - . **44,711** U.S. citizen employees
  - . **3.6** billion call transactions handled annually
  - . **1.4** million government, not-for-profit, professional, healthcare and commercial subscribers
  - . **\$552,170** – average annual gross revenues per business
  - . **45** percent of average gross revenues goes to direct payroll expenses
  - . **\$1.5** billion annual gross revenues – industry-wide
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### TYPICAL PSCRC SUBSCRIBERS

#### Commercial Continuity

Banks  
Fuel Delivery Services (emergency generators)

#### Communications

Cable (MSO) Service Providers  
Internet Service Providers  
Telephone Carriers  
Wireless Messaging Carriers  
Wireless Telephone Carriers

#### Disaster Relief / Crisis Assistance

Rape Crisis Centers  
Red Cross  
Search & Rescue Leagues  
Suicide Hotlines

#### Environmental Services

Environmental Agencies  
Environmental Contamination & Cleanup Services  
Hazardous Material Response Services  
HazMat Decontamination Teams

#### Federal and State Government

Federal Reserve Bank Branches  
Homeland Security Regional Offices  
Immigration and Customs Enforcement  
Field Offices  
OSHA Field Offices  
State Regulatory Commissions

#### Foreign Government

Consulates  
Embassies

#### Industrial Operations

Chemical Plants  
Gas Distribution Companies  
Petrochemical Plants  
Pipeline Operations

#### Healthcare

Ambulance Services (private sector)  
Blood Centers  
Burn Centers  
Clinics  
Funeral Homes, Crematoriums  
Home Health Services  
Hospices  
Hospitals — General, Specialty, Pediatric  
Infusion Therapists  
Oxygen Supply Delivery  
Public Health Clinics  
Physicians  
Surgeons  
Trauma Centers & Emergency Rooms

#### Miscellaneous Services

Animal Control Services  
ASPCA  
Veterinary Services

#### Public Safety

9-1-1 Public Safety Answering Points  
Alcohol, Tobacco & Firearms Field Offices  
Emergency Auto Removal (mass evacuations)  
Emergency Operations Centers (local and state)  
Federal Bureau of Investigation Field Offices  
Law Enforcement (county, state, highway)  
Police (local)  
Sheriff and Constable Offices  
Volunteer Fire Departments

#### Public Utilities

Electrical Power Utilities  
Heating Oil Delivery  
Natural Gas Utilities  
Propane/Butane Delivery  
Water Companies

#### Transportation

Airfreight  
Airport Operations  
Flight Base Operations Units  
Marine Freight & Shipping  
Rail Freight  
Rail Operations Centers  
Regional Traffic Control Centers  
Sea Ports