

**STATEMENT OF  
COMMISSIONER MICHAEL O'RIELLY**

Re: *Rural Call Completion*, WC Docket No. 13-39.

I was not at the Commission when the agency adopted the original call completion rules, but I commend my colleagues and Commission staff for their work to address this issue. Through these efforts and those of industry, there are far fewer reports of rural call completion issues today. That's not to suggest that there is not some work to do, as filings by rural carrier associations highlight that point. Given the vast improvement in the overall circumstances, it does seem an appropriate time to step back, take stock of our rules, and seek comment on whether changes are appropriate in light of the facts on the ground today.

This Second Further Notice seeks comment on swapping one approach, reporting requirements, for another, requiring covered carriers to police intermediate providers. I do agree that if the current reporting requirements are not yielding useful information, we should consider modifying them or eliminating them altogether.

At the same time, I have some questions and reservations about the potential mandates on covered carriers. As my prior statements make clear, I am generally wary of transforming voluntary industry practices into Commission requirements, and we should be very clear that carriers will not be held strictly liable for honest mistakes or circumstances beyond their control. In addition, I am interested in understanding the costs and benefits of this new approach. At least some carriers have already taken steps to limit the number of intermediate providers and monitor their performance, so perhaps adding this requirement will not prove to be unduly burdensome in the end, assuming we get to that point. In terms of substance, I was not in favor of applying this new structure to one-way VoIP, which the Commission has clearly and rightfully distinguished from interconnected VoIP in other instances, so I am pleased that this provision was removed from the item.

I will vote to approve this item.