

Attached are CWA Comments to FCC on AT&T's Technology Transitions Trials. Please advise if you would like these distributed to all Telecom VPs.

AT&T has proposed two technology trials: one in rural Carbon Hill AL with 4,300 living units and another in King's Point FL in suburban Palm Beach County, an area with many senior citizens. The trials will be subject to FCC oversight, and must protect public safety, network reliability, affordable universal service, consumer protections, and competition. The FCC will also monitor for jobs impact.

AT&T states that a significant number of customers have already migrated to either U-Verse or wireless service from plain old telephone service. AT&T proposes to encourage voluntary migration of the remaining POTS customers to wired and wireless IP services during Phase 1. Phase 2 will only begin after the FCC gives approval; during that phase, AT&T proposes mandatory migration and shutting down the TDM circuit-switched network.

We make these points:

1. CWA generally supports the technology trials. The IP Transition is happening. It is better to have FCC-supervised trials with consumer protections than unilateral moves to shut down the circuit-switched network like Verizon did with Voice Link on Fire Island NY. These trials give us factual information about what the transition will mean for customers and workers.
2. CWA represents the employees in the trial wire centers and will monitor the impact of the trial on the workforce. CWA will be "eyes on the ground" for the impact on workers and consumers.
3. During Phase 1 of the trial, participation is voluntary. The FCC should not allow AT&T to move forward on Phase 2 until it has developed a Wireless Home Phone with digital capabilities, compatible with health and security monitors, E911 location accuracy, etc.
4. AT&T should not be allowed to shut down "Dial 0 to reach an operator" as a mandatory service.