

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
AT&T Petition to Launch a)	GN Docket No. 12-353
Proceeding Concerning the)	
TDM-to-IP Transition)	
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**Comments of
Communications Workers of America**

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In response to the Commission's Public Notice ("Public Notice") seeking comment on AT&T's Proposal for Service-Based Technology Transitions Experiments,¹ the Communications Workers of America ("CWA") submits these comments in general support of AT&T's Proposal for Wire Center Trials ("AT&T Proposal").² CWA represents 700,000 workers in communications, media, airlines, manufacturing, and public service who have an interest in the TDM-to-IP Transition both as workers and as consumers. CWA represents the AT&T technicians and customer service employees in the two proposed trial locations, Carbon Hill, AL and Kings Point, FL. Nationally, CWA represents more than 100,000 employees at AT&T providing wireline and wireless services.

CWA commends the Commission for establishing a framework for technology trials designed to protect and enhance the enduring values of our nation's communications networks: public safety, network reliability, universal affordable access, consumer protections, and competition.³ As carriers transition to IP-networks, it is imperative that the Commission and the public have a full understanding of the opportunities and challenges that these communications networks provide. Most important, as the Commission has emphasized, is a consideration of the

¹ FCC, *Public Notice*, "Commission Seeks Comment on AT&T's Proposal for Service-Based Technology Transitions Experiments," Feb. 28, 2014 (rel) ("*Public Notice*").

² In the Matter of Technology Transitions (GN Docket No. 13-5) and AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition (GN Docket No. 12-353), AT&T Proposal for Wire Center Trials, Feb. 27, 2014 ("AT&T Proposal").

³ *Technology Transitions*, et al. GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Jan. 31, 2014 (rel) ("*Technology Transitions Order*"). CWA urged the Commission to adopt the following principles as the basis for its technology transitions trials: network reliability, public safety, universal affordable quality service, consumer protections, and job-creating investments in high-speed broadband networks. *See* CWA Comments, In the Matter of Technology Transitions Policy Task Force Seeks Comment on Potential Trials, GN Docket No. 13-5, July 8, 2013.

economic impact of all-IP networks on changes in telecommunication-related employment and skill mix as well as other effects on local economic opportunities.⁴

As the Commission has noted, the transition from TDM circuit-switched to all IP networks is already taking place, providing in many instances new and improved advanced digital services that benefit consumers, businesses, and public institutions. Yet, the Commission is also aware of the disastrous experience in Fire Island, NY, where Verizon attempted to substitute its Voice Link fixed wireless service for wireline TDM service. Verizon did this without approval or oversight by this Commission or state regulatory authorities. Fire Island residents, businesses, public safety and other officials vigorously protested Verizon's inferior Voice Link service, which does not provide access to data transmission and does not support home and security monitors, E911 location address, and other services.⁵ In contrast, AT&T's proposed trials will be subject to FCC approval and oversight, consistent with the enduring values and data collection requirements of the *Technology Transitions Order*. As the Commission explained, these trials must protect consumers while providing the data needed to inform the complex operational, legal, and policy questions as carriers transition to IP-based services in a manner that protects and promotes our nation's interest in safe, reliable, universal, affordable service and investments in job-creating high-quality networks.⁶

⁴ *Technology Transitions Order*, para 76.

⁵ See CWA Comments, In the Matter of Application of Verizon New Jersey Inc. and Verizon New York Inc. to Discontinue Domestic Telecommunications Service, WC Docket No. 13-150, Comp. Pol. File No. 1115, July 24, 2013; See also Letter from Peter McGowan, General Counsel, NY Public Service Commission to Ms. Marlene Dortch, In the Matter of Section 63.71 Application of Verizon New York, Inc. and Verizon New Jersey, Inc., WC Docket No. 13-150, July 29, 2014.

⁶ FCC Press Release, "FCC Authorizes Voluntary Experiments to Measure Impact on Customers of Technology Transitions in Communications Networks," Jan. 30, 2013 (sic).

In general, CWA supports AT&T's proposal for wire center trials in the two proposed locations: rural Carbon Hill, AL and suburban Kings Point, FL. Carbon Hill, AL is a small rural community of about 4,400 living units and Kings Point, FL in Palm Beach County is a suburban location of about 50,000 living units, many occupied by senior citizens. In both locations, a large segment of customers have already migrated to wireless, IP-based or other services. During Phase I of the trial, AT&T will encourage those customers who currently subscribe to TDM circuit-switched service ("plain old telephone service," or POTS) to migrate to wireline or wireless broadband services. While the redacted proposal does not provide the proportion of customers that will be offered wireless and not wireline broadband services, presumably a larger portion of the rural customers in Carbon Hill AL will be offered the wireless service because of a presumed longer distance from the central office and a weaker economic case for investment in U-Verse wireline services due to low population density.⁷

CWA represents the technicians who maintain and service the wireline and wireless networks in the areas served by the trial wire centers in Carbon Hill AL and Kings Point FL. CWA also represents the AT&T call center employees who sell and provide service to AT&T's wireline and wireless customers. (AT&T wireline and wireless call centers service customers on a regional and national call distribution system.) CWA has been in dialogue with AT&T about the impact of the trial on the workforce, and will continue to monitor this as the trial moves forward. It is critical to the success of the trial that the work be performed by skilled, career professionals. As the technology transition requires new or different skill sets, CWA expects AT&T to train existing employees to perform the work on the IP networks, and to work with

CWA to ensure that any redeployment is done in a manner that maximizes job security and career opportunity. As eyes on the ground, CWA will be able to provide the Commission with valuable information about the impact of the trials on the workforce and also on consumers in the trial locations.

The Commission must collect substantial data during the trials to provide the factual information necessary to address the operational, legal, and policy questions implicated by the TDM-to-IP transition. It appears to us that the Commission should expand upon the data collection proposed by AT&T. This trial offers the opportunity to gather data on questions that are fundamental to the IP transition, including 1) what impact does wireless substitution have on price, quality, reliability, service delivery, public safety, consumer protection and high-speed broadband connectivity; 2) what impact do IP networks that depend on commercial power have on public safety and network reliability, price, service offerings, consumer protection, and high-speed broadband connectivity; 3) what impact does the retirement of the TDM network have on investment in high-speed wireline networks; and 4) what impact does the retirement of the TDM network have on employment and local economic impacts? The Commission must require substantial data collection, including third party verification, to provide the factual basis to help answer these and other questions.

The Commission must also insist upon a reliable, consumer friendly agency and process to receive and resolve customer complaints during the course of the trials. Unfortunately, in this instance, the FCC cannot delegate the consumer complaint and adjudication process to state regulatory agencies, because the Florida and Alabama legislatures have significantly reduced

⁷ See AT&T Proposal, pages 13-15 and AT&T: Wire Center Trial Operating Plan, pages 3-11.

(Alabama) or taken away (Florida) authority over customer complaints. While in general CWA prefers that state regulatory commissions assume this function, in this case, it appears that the FCC must itself become the consumer complaint and adjudication agency.

AT&T explains that Phase I of the trials is voluntary, during which time AT&T will grandfather existing customers, but will offer only next generation wireless and wireline IP-based services for new orders.⁸ CWA is concerned about this loophole in its voluntary commitment, as it is clear that the wireless IP-based service is not yet ready for prime time. According to AT&T, its Wireless Home/Business Phone is not compatible with E-911 with street address, does not support alarm monitoring, medical alert, credit card validations, 800 service, video relay service, and Internet access connectivity. Rather, AT&T proposes that Home Phone subscribers will be able to connect to the Internet on its 4G LTE (or other) wireless network. Wireless connectivity is typically more expensive than DSL Internet service.⁹

AT&T states that it will not move on to Phase II's mandatory migration until the Commission has reviewed Phase I and authorized AT&T to move forward to the full IP transition.¹⁰ The Commission should not approve Phase II mandatory migration until the Wireless Home Phone option is ready for prime time, providing E911 with street address, data transmission capability, compatibility with security and health monitors, and other essential capabilities at the same quality and pricing as the TDM-based services.

⁸ AT&T Proposal, page 11.

⁹ AT&T Proposal, 17-21 and AT&T Wire Center Trial Operating Plan, pages 12- 16 (see especially chart on page 14).

¹⁰ AT&T Proposal, page 11.

Finally, AT&T notes that neither its U-Verse voice nor Wireless Home/Business Phone provides “live operator via “0”. CWA sees no technological reason that U-Verse and the wireless broadband service cannot provide access to a live operator by dialing 0. This service provides not only an important consumer service, but one that is vital in times of emergency, saving lives. The Commission must insist that these services continue to provide direct dial access to a live operator by dialing 0.

Respectfully Submitted,

A handwritten signature in black ink, reading "Debbie Goldman". The signature is fluid and cursive, with the first name "Debbie" written in a larger, more prominent script than the last name "Goldman".

Debbie Goldman
Communications Workers of America

March 31, 2014