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

In the Matter of Section 63.71 Application of AT&T Services, Inc., on behalf of its affiliate Southwestern Bell Telephone Company, LLC, d/b/a AT&T Oklahoma. Authority Pursuant to Section 214 of The Communications Act of 1934, As Amended, To Grandfather and to Discontinue the Provision of Service SECTION 63.71 APPLICATION OF AT&T	)	WC Docket No. 24-220

COMMENTS OF PUBLIC KNOWLEDGE

Public Knowledge (PK) submits these comments in general support of AT&T's application. The sole addendum is to request that AT&T make regular reports in this docket as to the progress of the transition. This will assist the Commission and the public to monitor the progress of the transition, and provide other incumbent local exchange carriers with a guide to conducting their own transitions.

ARGUMENT

As the Commission first noted more than 10 years ago, the end of the traditional legacy copper network and its replacement with a heterogeneous network relying on multiple technologies and transmission media can only succeed if grounded in the core principles that have governed our national communications network since their inception.[1] First and foremost among these principles is universal service. Congress created the FCC explicitly to make good on this pledge to make available "to all people of the United States," access "to a nation-wide

[1] *Technology Transitions*, GN Docket No. 13-5, 29 FCC Rcd 1433 (2014) ¶ 50.

and world-wide wire and radio communications service, with adequate facilities at reasonable charges."[2] The Commission therefore created rules to govern the end of our universal copper network and its replacement with a universal communications network that would ensure an upgrade for everyone – not an upgrade for some and a downgrade for others.

AT&T's application and test results demonstrate that – despite the arguments of many that we could only upgrade the next Public Switched Network by sacrificing subscribers in rural areas – we can continue to honor the commitment to universal service for all. AT&T's creation and deployment of its AT&T Phone, Advanced (AP-A), demonstrates that proper oversight of private enterprise in the public interest results in a win-win for both the providers and their customers. AT&T's testing results demonstrate that a replacement technology for legacy telephone service is both technologically and economically feasible. For this, both the Commission and AT&T should be applauded.

At the same time, however, the Commission should not simply assume "mission accomplished." Scaling the deployment from testing to full deployment will take time, and new challenges may emerge as the process continues. The Commission should therefore continue to monitor the deployment of AP-A and subsequent operation of AP-A to ensure that it performs as expected. This will allow the Commission to perform its most core responsibility – providing access to all Americans to a reliable and efficient system of communications "for the purpose of the national defense, [and] for the purpose of promoting safety of life and property through the use of wire and radio communications."[3]

Specifically, the Commission should require regular reports from AT&T on the progress of the transition, any difficulties (including any issues involving compatibility with legacy

[2] 47 U.S.C. § 151.
[3] *Id. See also Tech Transitions*, *supra* n.1, at ¶ 50 ("Ensuring that all Americans have access to communication services – the value of universal access – is central to our statutory mission").

equipment performing functions included in the testing plan) encountered, and how these difficulties were resolved. The Commission should also monitor the NORS database to determine whether there is an increase (or decline) in outages as a consequence of the transition. The Commission should, in turn, publish a regular report on the progress of the transition. This will keep both Congress and the public informed on our national telephone upgrade, and provide a roadmap for other ILECs as they transition their legacy networks.

CONCLUSION

As the legacy Public Switched Network ends, a new Public Switched Network rises to take its place. AT&T deserves applause for development of a new technology that both supports critical legacy functions while moving America's Public Switched Network forward. But the Commission cannot forget that ultimate responsibility for the success of the transition lies with the FCC itself. It is the core responsibility of the Commission to monitor the reliability and stability of our critical communications infrastructure for every American. Close monitoring of the deployment of the retirement of the legacy network is a simple, but necessary, step in fulfilling that responsibility.

Respectfully submitted,

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