

# STEPHEN L. GOODMAN, PLLC

ATTORNEY AT LAW

532 NORTH PITT STREET

ALEXANDRIA, VA 22314

TELEPHONE (202) 607-6756

E MAIL: [stephenlgoodmanllc@gmail.com](mailto:stephenlgoodmanllc@gmail.com)

Admitted in D.C. and Florida

January 19, 2018

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: *Ex Parte Presentation – Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58; Rural Broadband Experiments, WC Docket No. 14-259; and Connect America Fund Phase II Auction, AU Docket No. 17-182*

Dear Ms. Dortch:

On January 9<sup>th</sup>, the Commission released a Draft Order addressing reconsideration petitions in the above-captioned proceedings. One of the Petitions for reconsideration being resolved in that Draft Order was filed by ADTRAN, Inc. (“ADTRAN”).<sup>1</sup> ADTRAN is submitting this letter because the Draft Order inaccurately describes the relief requested in ADTRAN’s Petition for Reconsideration, and ADTRAN wants to provide the Commission with the opportunity to correct the Draft Order before the Commission votes on this item at its January 30<sup>th</sup> Meeting. According to the Draft Order:

ADTRAN proposes requiring a testing methodology that uses a model network in a laboratory setting and argues that this is preferable to a methodology that listens to calls on the actual network. ADTRAN does not mention the ITU’s other recommended option: interview and survey tests. We find that there is insufficient information in the record to specify which of the ITU’s recommended options applicants should be prepared to use to demonstrate an MOS of four or higher.<sup>2</sup>

In fact, ADTRAN in its Petition for Reconsideration had expressed concern because the referenced ITU standard (Recommendation P.800) offers as two options a conversational-

---

<sup>1</sup> ADTRAN Petition for Reconsideration, Filed July 5, 2016.

<sup>2</sup> Draft Order at ¶ 16.

opinion test and a listening-opinion test.<sup>3</sup> In its Petition for Reconsideration, ADTRAN explained that use of the listening-opinion test does not adequately capture the quality of a conversation, because it is asking the testers simply to evaluate the sound quality of a recording of a transmission, not to actually engage in a conversation. As a result, the potential effect of latency on the quality of a conversation is ignored under the listening-opinion test. Indeed, as the ITU Recommendation P.800 acknowledges:

Listening tests have direct applications in the assessment of physical transmission systems which are essentially unidirectional. Examples include broadcast circuits, public address systems and recorded announcement systems in which listening degradations such as loss, noise and distortion may be present. Results of listening-only tests can be applied, but only with certain reservations, to the prediction of the assessment for conversation conducted over a two-way system, such as a connection in a public switched telephone network.<sup>4</sup>

Thus, ADTRAN is not advocating use of a model network in a laboratory setting in lieu of use of the actual network. Rather, ADTRAN proposed that the Commission specify use of a conversational-opinion test, and not a listening-opinion test. The conversation-opinion tests could be conducted using the actual network, albeit in a controlled setting. Because the Commission is attempting to ensure that the subsidized broadband subscribers can experience high-quality voice services, a listening-opinion test would not provide such assurance. Moreover, the uncontrolled nature of interview and survey tests also offered as an option under ITU Recommendation P. 800 would likewise not necessarily ensure that telephone conversations over the system were being evaluated. ADTRAN thus continues to urge the Commission -- or the Bureaus (Draft Order at ¶ 16) -- to specify use of the conversation-opinion test.

Sincerely,

/s/

Stephen L. Goodman  
Counsel for ADTRAN, Inc.

cc: Donald Stockdale  
Kris Monteith  
Julius Knapp

---

<sup>3</sup> The Draft Order properly characterized that aspect of ADTRAN's Petition for Reconsideration at ¶ 15.

<sup>4</sup> ITU Recommendation P.800 at p. 4. A copy of that ITU document is enclosed for your convenience.