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May 31, 2018

*Via Electronic Filing*

*Ex Parte Communication*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Portals II, Room TW-A325  
Washington, DC 20554

Re: *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84.

Dear Ms. Dortch:

AT&T submits this letter in response to ADT Security Services (“ADT”) ex parte letters filed on May 23, 2018 and May 25, 2018 and Alarm Industry Communications Committee (“AICC”) ex parte letter filed May 31, 2018 in which ADT and AICC express concern about the alternative options test that is proposed in the Commission’s Draft Order released May 17, 2018. As discussed below, ADT’s and AICC’s arguments must be rejected.

ADT’s and AICC’s arguments, that discontinuing carriers should be required to demonstrate that next generation voice services are interoperable with key applications and functions, such as alarm systems, is baseless. In fact, subscribership data belies this claim. As noted previously, only about 14% of American households still rely on legacy TDM landlines.<sup>1</sup> Thus, the vast majority of the voice market has already made the judgment that services provided over alternative technologies, including wireless, are better than legacy TDM voice services. Consumers know what they want and need, and they would not have abandoned TDM services in droves if the alternative services did not meet their needs, including medical monitoring devices and home security alarm systems. A good example is the service functionality of cable-provided digital voice services, which were not subject to a service interoperability mandate. These services work with the vast majority of alarm systems, and fax machines.<sup>2</sup> Yet, these providers did not need a regulatory mandate to ensure their services operated with third party devices that their customers used. Instead, the market dictated the requirements of a successful voice service, and cable and other providers designed their services to meet that demand or face the consequences of the market. Thus,

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<sup>1</sup> See AT&T Comments at p. 42.

<sup>2</sup> See for example, <http://customer.xfinity.com/help-and-support/phone/home-alarm-systems-phone/>; See also <https://www.spectrum.net/support/voice/security-and-911-information/>.

there is no need for the Commission to second guess these judgments and require discontinuing carriers to demonstrate what the market has already proven.<sup>3</sup>

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

/s/ Ola Oyefusi

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<sup>3</sup> See AT&T Comments at p. 45, see also AT&T Reply Comments at pp. 32-34. It is a false claim, however, to suggest that interconnected VoIP cannot support these functions. See AT&T Wire Center Trial Operating Plan filed February 27, 2014, p. 14 (where AT&T acknowledged that AT&T Phone, i.e. Uverse, supports alarm monitoring and medical alert); also, Verizon's exparte letter of April 26, 2018, p. 2 (confirming that its interconnected VoIP, i.e. Fios, can support medical monitoring devices or alarms).