



Mary L. Henze
Assistant Vice President
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, NW, Suite 1000
Washington, D.C. 20036

Phone : 202 457-2041
E-Mail: mary.henze@att.com

June 20, 2016

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: *Connect America Fund, WC Docket No. 10-90*

Dear Ms. Dortch:

On June 16, 2016 Hany Fahmy, Cathy Carpino and the undersigned, all of AT&T Services, Inc. (AT&T), met with Suzanne Yelen, Alex MacDonell, Rodger Woock, Cathy Zima, and Nissa Laughner of the Wireline Competition Bureau. During the meeting AT&T presented a proposal for conducting Connect America Fund Phase II (CAF II) broadband performance testing that we believe meets the framework of the Commission's October 2014 Public Notice (DA 14-1499). In addition, AT&T recommended that testing should be conducted over the period of time that reflects actual usage periods of both residential and business customers and that would minimize the impact of testing on the overall customer experience.

To meet both its CAF II performance certification requirements as well as broader business needs for measuring network performance, AT&T has begun using a software tool installed on the residential gateway (RG) that is an integral part of receiving Internet access service. No additional CPE is required. The software enables tests to be initiated without customer intervention and measures performance on the network path from the customer premises to testing servers at the Internet edge. This software/RG solution can be used to test all types of broadband technologies (e.g., FTTN, FTTP, fixed wireless) and can be readily programmed to test a random group of customers that can change every year. AT&T explained that it uses software that functions on any RG using a Broadcom chipset, but it noted that since similar software is available for other types of RGs, this proposed solution could be readily replicated by other carriers or made available to smaller providers via the Universal Service Administrative Company.

In addition to utilizing a software/RG solution for CAF II testing AT&T also recommended that the Commission adopt a testing timeframe that 1) minimizes the impact of testing on the customer experience and 2) reflects the types of use that deploying broadband into rural areas is intended to support. The 2014 PN proposed an evening-only testing timeframe of 7:00 pm to 11:00 pm but AT&T's internal data indicates that an 18-hour timeframe (6:00 am to midnight) would be more appropriate.

All network testing methodologies, by definition, utilize the same network resources available to a customer and thus running the test can degrade the speed, capacity, and/or functionality of the service the customer is experiencing. Moreover, given the statistical multiplexing inherent in broadband services, testing exclusively during a relatively short window could degrade the functionality of the service for other customers. Condensing all testing into a four hour period exacerbates this problem by forcing carriers to do more simultaneous testing regardless of the customer impact. A longer testing timeframe would mitigate this concern while at the same time encompass the multiple usage cycles that are typical of networks serving both business and residential customers and weekday/weekend traffic. The purpose of CAF II is not limited to enabling evening Internet use in rural households. A key goal of deploying broadband deeper into rural America is to enhance educational opportunity and help small and home-based businesses reach national and international markets. AT&T analysis shared during the meeting shows that there is not a single peak period, but rather multiple periods of heavier usage, especially when residential, business, weekday and weekends are all factored in. CAF II recipients must deploy networks capable of meeting the diverse needs of rural customers, both during the day and the night, and an 18-hour timeframe better encompasses this responsibility.

All materials used during the meeting are attached. Please feel free to contact me should you have any questions about this matter.

Sincerely,

/s/ Mary L. Henze

Mary L. Henze

Attachment

cc: S. Yelen
A. MacDonell
R. Woock
C. Zima
N. Laughher