

**Before the
Federal Communications Commission
Washington, D.C. 20554**

Ensuring Customer Premises Equipment Backup)	PS Docket No. 14-174
Power for Continuity of Communications)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
Policies and Rules Governing retirements Of)	RM-11358
Copper Loops by Incumbent Local Exchange)	
Carriers)	
)	
Special Access for Price Cap Local Exchange)	WC Docket No. 05-25
Carriers)	
)	
AT&T Corporation Petition for Rulemaking to)	RM-10593
Reform Regulation of Incumbent Local Exchange)	
Carrier Rates for Interstate Special Access)	
Services)	

COMMENTS OF THE APPALACHIAN REGIONAL COMMISSION

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The Appalachian Regional Commission (ARC) is a joint Federal/State partnership organization representing 420 counties in a thirteen state area which defines the Appalachian region. Our region is 205,000 square miles that extend from lower up-state New York to northern Mississippi. Forty-two percent of our Region's population is classified as rural, compared with twenty percent of the national population. The poverty rate throughout Appalachia is in excess of sixteen percent but we still have many high-poverty counties which are classified as "distressed". These are usually very rural counties that have been negatively impacted by the loss of major industries. Examples would include coal mining areas where mines have closed or the closing of textile/furniture companies. In rural settings, it is very hard to replace the jobs lost when a major employer leaves the area.

Rural areas also have a difficult time with affordable and reliable broadband access. While much of the population of our region may have access to broadband services, we still have many geographic areas that remain underserved and unserved. While the number of people living in these areas may be small, the lack of access is indeed a major problem.

ARC has carefully followed many of the broadband related dockets on the FCC's calendar. While not filing formal comments, we were happy to see the expansion of the E-rate program that will provide additional funding to help rural school systems boost their bandwidth availability. Throughout Appalachia, many schools do not have the bandwidth available that they need.

We have also been closely following the IP Transition issue and trials— especially since Carbon Hill, Alabama is within our region. As AT&T, and most likely other providers, will want to take the lessons learned during the trials and use them when implementing the transition throughout their entire service area, it is very important to get the "rules" right and make sure rural areas are not disadvantaged because of this transition.

While numerous issues have been raised with regard to battery backup systems, the ability to use alarm or medical devices over wireless networks, 911 accessibility and/or reliability under the IP environment, etc., we feel these issues will be satisfactorily solved. We expect that all households will ultimately be provided with a device that will allow a reliable connection to place and receive calls.

In that regard, we do have a concern over the substitution of wireless connections in place of landline connections. Our concern is more with the result of removing the wireline connection than with installing a wireless connection. In rural areas, there are usually two "wires" going into a home. One is the electric drop and the second is the telephone drop. More rural areas do not have cable service available – so there may not be a cable drop. If cable is not available, the only real possibility of obtaining a landline based internet connection is through the telephone landline. (We acknowledge

there have been some attempts at broadband over power lines – but this is not widespread by any means). If the telco landline is removed (and replaced with a wireless substitute) then there will be no chance of obtaining a landline based internet service. In the case of Carbon Hill, Alabama, our understanding is in excess of 55 percent of the customer locations will lose a landline connection.

We recognize that many of these locations have access to cable service and almost all will have access to mobile broadband services coming off the cell towers. For those locations without cable service, mobile broadband can be more costly, not as reliable and subject to data caps and overage charges. We are afraid comparable service at comparable rates between urban and rural areas may not pertain to broadband and/or high speed internet services. It really can't when the preferred service is simply not available in a rural setting.

Broadband access is increasingly important. We have had reports where rural schools have been having a hard time instituting flipped learning concepts and using digital textbooks when the students do not have broadband access at home. Rural businesses need affordable and reliable access. If we want our rural areas to grow and prosper, we need to make sure they have at least an acceptable level of broadband access.

The FCC recognizes this and has made efforts to increase broadband penetration and adoption. Expanding the E-rate was a great benefit to rural schools. Raising the standard on the broadband definition should ultimately result in more bandwidth availability. Rural areas have always been more costly to serve and that still remains true today. While greater infrastructure and access is needed throughout rural America and rural Appalachia, we urge the FCC to proceed cautiously with issues that could result in decreasing the available infrastructure. It's hard to square the concept of protecting competition and making sure consumers have the information needed to make informed choices when they are potentially losing the only connection that will provide any choice. Wireless may be an acceptable substitute for a wireline connection for voice services. It is questionable whether it is acceptable for broadband. Even in areas where DSL service is not yet available, removing the wireline connection will make sure it is never available. Rural areas will then be dependent on either a wireless/satellite solution or the hope another provider will eventually wire-up the area.