

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

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

REPLY COMMENTS OF FRONTIER COMMUNICATIONS CORPORATION

I. INTRODUCTION

Frontier Communications Corporation (“Frontier”) submits the following reply comments to the Federal Communications Commission’s (“Commission”) Notice of Proposed Rulemaking (“NPRM”) in the above-referenced proceedings.¹ As a general matter, Frontier supports the comments filed by ITTA – The Voice of Mid-Size Communications Companies

¹ *Technology Transitions, et al.*, Notice of Proposed Rulemaking and Declaratory Ruling, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593, 29 FCC Rcd 14968 (rel. Nov. 25, 2014).

(“ITTA”)² and by the United States Telecom Association (“USTelecom”).³ In particular, Frontier opposes (a) any requirements that would require incumbent local exchange carriers (“ILECs”) to provide wholesale access after transitioning to fiber; (b) any new notification requirements related to the retirement of copper; and (c) any new obligations related to the provision of backup power to customer-premises equipment (“CPE”). Such overly burdensome regulations would stifle innovation and investment and discourage broadband deployment. Frontier files these brief reply comments specifically to express additional opposition to any new backup power requirements.

II. CPE BACKUP POWER MANDATES ARE UNNECESSARY AND OVERLY BURDENSOME

Additional CPE backup power mandates are unnecessary because most consumers already rely on alternative sources for voice calls, including wireless service, and because backup CPE power or other alternatives are readily available to consumers who so desire them. Given these ample alternatives, an additional backup power mandate would impose additional costs on consumers and carriers alike, with limited if any benefits. Moreover, imposing any backup power mandates on carriers is overly burdensome because consumers – who are already responsible for providing CPE – are in the best position to understand their CPE backup power needs and adopt associated precautions.

A CPE backup power requirement is unnecessary first because most consumers do not rely on landlines as their only resource for placing an emergency call during a power outage. As

² See Comments of ITTA – The Voice of Mid-Size Communications Companies, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 (Feb. 5, 2015) (“ITTA Comments”).

³ See Comments of the United States Telecom Association, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 (Feb. 5, 2015) (“USTelecom Comments”).

USTelecom,⁴ the Telecommunications Industry Association (“TIA”),⁵ CenturyLink,⁶ and others explain, consumers already largely ensure redundancy in communications, as evidenced by the large number that have active wireless services in addition to traditional wireline voice or voice over Internet protocol (VoIP) service. According to USTelecom, during 2013, more than 90 percent of telephone households had wireless service and 43 percent used only wireless telephones for voice service.⁷ USTelecom projects that the portion of customers relying either exclusively or mostly on traditional landlines will be only 11 percent by the end of 2015.⁸

To the extent that a consumer demands or requires backup CPE power, such backup power is readily obtainable. As Verizon explains, “[c]ustomers have a wide array of choices for backup battery options, depending on their particular needs”⁹ Indeed, as AT&T notes, “consumers are accustomed to obtaining and maintaining self-provisioned CPE backup power.”¹⁰

There is, however, limited consumer demand for CPE backup power. As ITTA,¹¹ TIA,¹² and others explain, large numbers of consumers – including more than 31 million cable customers that subscribe to the cable companies’ voice services¹³ – have already opted for

⁴ *Id.* at 3.

⁵ Comments of the Telecommunications Industry Association, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 at 5 (Feb. 5, 2015) (“TIA Comments”).

⁶ Comments of CenturyLink, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 at 46 (Feb. 5, 2015) (“CenturyLink Comments”).

⁷ USTelecom Comments at 3.

⁸ *Id.* at 4.

⁹ Comments of Verizon, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 at 18 (Feb. 5, 2015) (“Verizon Comments”).

¹⁰ Comments of AT&T Services, Inc., PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 at 7 (Feb. 5, 2015) (“AT&T Comments”).

¹¹ ITTA Comments at 19.

¹² TIA Comments at 5.

¹³ According to ITTA, as of December 31, 2013, more than 31 million cable customers were receiving voice service over coaxial cable. *See* ITTA Comments at 19

services that are not dependent on carrier-furnished power.¹⁴ According to Verizon, “[n]otwithstanding the availability of backup batteries, many customers today choose not to obtain a battery, given the growing reliance on wireless or the customers’ use of handsets or other devices that themselves require commercial power to operate.”¹⁵

Ultimately, carriers are not in the most cost-effective position for providing CPE backup power; consumers are. As ITTA explains, “[c]arriers typically have no role in the market for battery backup equipment.”¹⁶ Because consumers provide and are responsible for their own CPE, carriers, as CenturyLink explains, “are not in a position to understand what types of battery back-up might be either appropriate or preferred by customers.”¹⁷ Proposals that shift the costs to the party that is least able to cost-effectively address the issue risk unnecessarily increasing expenses for carriers and consumers alike.

¹⁴ See also Comments of Cincinnati Bell Telephone Company LLC, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593 at 6-7 (Feb. 5, 2015) (“Cincinnati Bell Comments”). (“[W]ith the emergence of voice service over cable networks and other VoIP and wireless services, it quickly became apparent that the majority of consumers do not value the independent power supply that accompanied traditional copper-based voice service.”).

¹⁵ Verizon Comments at 17-18.

¹⁶ ITTA Comments at 21; see also CenturyLink Comments at 49 (“IP service providers are in the business of providing IP services, not in the business of providing CPE as a separate commodity.”).

¹⁷ Verizon Comments at 19.

III. CONCLUSION

By avoiding any additional burdens on broadband providers, including any unnecessary and overly burdensome CPE backup requirements, the Commission will continue to promote innovation and broadband deployment.

Respectfully submitted,

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