

May 4, 2015

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

Re: GN Docket No. 12-353, Comment Sought on the Technological Transition of the Nation's Communications Infrastructure; GN Docket No. 13-5, Technology Transitions Policy Task Force

Dear Ms. Dortch:

On April 30, Jodie Griffin, Senior Staff Attorney, and Edyael Casaperalta, New Venture Fund Internet Rights Fellow, of Public Knowledge (PK) met with Lyle Ishida and Keyla Hernandez-Ulloa from the FCC's Consumer and Governmental Affairs Bureau to discuss consumer outreach with regards to the ongoing technology transitions.

Public Knowledge encouraged the Commission to begin taking steps to educate consumers about the changes our telephone network is undergoing. We are in the midst of this transition, and carriers are becoming more aggressive in seeking to transition their networks. Now is when we most need the Commission to reach out to consumers to help them understand how the technology transitions will affect the communications services available to them. Public Knowledge believes that informing consumers of these technology changes is crucial to ensure the network transition is handled in a way that continues to protect the enduring values of the network.<sup>1</sup> Public Knowledge offered the following recommendations to the Consumer and Governmental Affairs Bureau:

### **The Commission Should Identify and Assess the Information Currently Available to Consumers Regarding the Technology Transitions**

In order to identify the educational needs regarding the technology transitions, the Commission must first investigate what information is currently available to consumers. Since carriers are the first line of contact with consumers regarding any changes to telephone service, Public Knowledge encouraged the Commission to consult with carriers about their efforts to inform their customers about the technology transitions. Public Knowledge stressed the importance of finding out what carriers are truly doing to fully inform their customers about technology changes and how they impact the services consumers have come to expect from their telephone because, as we filed in a letter with other public interest groups on May 12, 2014, carriers have been reported to not inform consumers of their option to maintain basic stand-alone telephone service and instead try to push bundled or new services on the consumer without explaining that

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<sup>1</sup> See Jodie Griffin and Harold Feld, *Five Fundamentals for the Phone Network Transition* PKTHINKS (July 2013), <https://www.publicknowledge.org/news-blog/blogs/five-fundamentals-for-the-phone-network-transition>.

some of the features of the old technology are not available with the new technology such as backup power during outages or being compatible with heart monitors and home alarms.<sup>2</sup>

Public Knowledge encouraged the Commission to utilize their 2015 Rural Tour as a learning opportunity to find out what consumers know about the technology transitions, what information is needed, and a space where educational materials can be distributed.

### **The Commission Should Create and Distribute Educational Materials to Consumers About the Technology Transitions**

Public Knowledge encouraged the Commission to develop easy-to-understand educational materials that will inform consumers about the technology transitions and how new technologies, whether IP, fiber, or wireless, will impact the communications services available to them. For example, the Commission should create a consumer guide about the technologies that carriers will now use to provide telephone service. This guide must list the features that each technology offers, such as backup power, 911 reliability, and the ability of other devices (heart monitors, ATM, and home alarms) to work with it. Highlighting the services that each technology offers will help consumers understand their communications choices so they can choose the option that best fits their needs.

Public Knowledge also encouraged the Commission to develop an easy-to-carry, bookmark size “Glossary of Technology Transitions Terms” that consumers can consult with them as they consider the telephone services available to them. Finally, PK encouraged the Commission to update the informational guide it releases in collaboration with FEMA during hurricane season that helps consumers learn about how to maintain communications services during natural disasters.

Public Knowledge informed the commission of a congressional briefing focused on the impact of the technology transitions in rural communities that it will host on May 12. We shared a description of the event and a list of the issues a panel of rural advocates will address at the briefing. The document has been submitted along with this Ex Parte.

Public Knowledge looks forward to supporting the efforts of the Commission in learning about the consumer educational needs during the technology transitions and sharing information that best prepares the public to maintain affordable, reliable, communications services during the transition.

Respectfully submitted,

/s/ Edyael Casaperalta  
*Internet Rights Fellow*  
PUBLIC KNOWLEDGE

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<sup>2</sup> See Public Knowledge, TURN, et. al, letter to the FCC, <http://apps.fcc.gov/ecfs/comment/view?id=6017635315>.