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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: Technology Transitions, GN Docket No. 13-5; Ensuring Customer Premises
Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174

Dear Ms. Dortch:

Frank Simone, Cathy Carpino, and I, all with AT&T Services, Inc. (AT&T) met with David Furth, Lauren Kravetz, Brenda Villanueva, Jeff Goldthorp, and Chuck Needy of the Commission on May 14, 2015. Jason Savard of AT&T and Jerry Stanshine of the Commission participated via conference call. AT&T and staff discussed issues related to the Commission's customer premises equipment (CPE) battery backup proposals contained in its November 25, 2014 *NPRM*.¹

Consistent with comments it filed in this proceeding, AT&T explained that consumers have overwhelmingly elected communications services that are not line-powered and, in the event of a power outage, consumers most likely will turn to their mobile phone to make voice calls. This is particularly true given that most consumers who continue to subscribe to a wireline voice service have cordless phones, which rely on commercial power and thus will not function in the event of a power outage.² We also discussed how providers have designed and engineered their Residential Gateways (RGs) differently, with some providers supplying or offering backup batteries that are either integrated with or external to the RG. Because of these differences, AT&T explained that it would be a mistake for the Commission to attempt to impose a one-size-fits-all battery backup solution on providers, if it determines one is needed, which it is not. Moreover, we discussed what little ability, if any, service providers have to monitor remotely customers' battery status. Instead, we

¹ *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, et al.*, PS Docket No. 14-174, et al., Notice of Proposed Rulemaking and Declaratory Ruling, FCC 14-185 (rel. Nov. 25, 2014) (*NPRM*).

² During the meeting, staff inquired what percentage of landline phones are cordless phones. According to the Consumer Electronics Association, three-quarters of landline phones purchased in 2013 were cordless phones. See AT&T Reply Comments, PS Docket No. 14-174 et al., at 8 & n.8 (filed March 9, 2015). See also *id.* at n.4 (citing ADTRAN Comments at 18 that indicate Americans purchased 7.3 million cordless phones in 2014).



explained that commercially available CPE backup batteries typically provide an effective visual and/or auditory notification when customers should replace the battery. Finally, we discussed what information we provide to customers about the effect of a loss of power on their VoIP service. We explained that AT&T provides this information to customers at the time of installation and we make available this information on our website.

AT&T shared the attached document with staff as it was discussing the topics described above. Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. Please do not hesitate to call me if you have questions.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

Cc:
David Furth
Jeff Goldthorp
Lauren Kravetz
Chuck Needy
Brenda Villanueva