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May 22, 2015

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, NW  
Washington, DC 20554

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

On May 20, 2015, Maggie McCready, Katharine Saunders, Robert Morse, and I, all of Verizon, met with Lauren Kravetz, Jerry Stanshine, John Healy, and Linda Pinto of the Public Safety Bureau, and Chuck Needy and Henning Schulzrinne of the Office of Strategic Planning.

In our meeting, we discussed Verizon's battery back-up options in connection with deployment of its fiber facilities. As Verizon has explained previously, phone service provided over fiber facilities is not the same thing as Verizon's FiOS service. Fiber refers to a physical medium: a network made up of fiber optic cables. FiOS refers to particular Verizon-branded voice, video, and data services that Verizon provides on an optional basis to customers over fiber. While millions of customers have elected to switch to Verizon's best-in-class FiOS services, many others receive the same traditional phone service they previously received over copper facilities, with the same features and at the same or better price, over Verizon's advanced fiber network.

We explained that in the event of a commercial power outage, fiber-based services will not work unless the customer has an alternative source of power such as battery back-up, generator, or uninterrupted power supply. Verizon provides customers with information about their back-up battery options on multiple occasions, including at the time customers decide to migrate services to fiber facilities, from the technician who migrates their service, and in their written welcome package. Verizon also provides periodic email notifications to customers reminding them, among other things, to check the status of their back-up power device.

Historically, Verizon has offered customers battery back-up using a 12 volt sealed lead acid battery. The 12 volt battery provides up to 8 hours of back-up for voice services, allowing a customer who has a corded telephone to place and receive calls during a commercial power outage. Customers are responsible for replacing the 12 volt battery, which may be purchased at retail stores or online, and for appropriate disposal of unused or depleted batteries at a local household hazardous waste facility.

Some customers who used the 12 volt battery back-up option raised concerns about the size and weight, replacement, and disposal of the battery. Other customers complained about the beeping when the battery needed to be replaced. An increasing number of customers found they did not need a battery back-up solution at all, given their increased reliance on their wireless phones in the event of a commercial power outage or use of cordless telephone handsets in their home that also require power to operate.

We explained that in light of these concerns, several years ago Verizon began research to develop a best-in-class consumer friendly battery back-up option for voice services. This solution, called the Verizon "PowerReserve," uses conventional D-cell batteries to provide approximately 20+ hours of back-up power for voice service, depending on the model of Optical Network Terminal at the customer's location.<sup>1</sup> Customers can easily purchase D-cell batteries in stores or online, and replacing batteries is straightforward and similar to replacement in other common household devices, such as a flashlight. We also explained that the PowerReserve is designed to work with Verizon equipment only and will not power other providers' network terminals. We noted that Verizon provides customers with a PowerReserve battery tester so that customers can monitor the battery charge level themselves. Verizon cannot monitor the charge level from the network, but we explained that customers are used to monitoring batteries in other devices, such as smoke detectors.

As with other providers, Verizon gives customers the option to purchase the back-up battery. We explained that, in our experience, only a very small number of customers elect to purchase battery back-ups given the near ubiquitous use of cell phones and customers' adoption of cordless telephone handsets in the home.

Very truly yours,



cc: Lauren Kravetz  
Jerry Stanshine  
John Healy  
Linda Pintro  
Chuck Needy  
Henning Schulzrinne

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<sup>1</sup> All battery life, whether 12 volt or D cell, depends on environmental conditions and customer calling behavior, including the number and duration of calls made. The PowerReserve has an on/off switch to further conserve back-up power.