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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Battery Backup, PS Docket No. 14-174; Technology Transitions, GN Docket No. 13-5

Dear Ms. Dortch

On June 12, 2015, Loretta Polk, Jennifer McKee, and Steve Morris of the National Cable & Telecommunications Association and Tom Cohen of Kelley Drye & Warren, on behalf of the American Cable Association (ACA), met with Daniel Alvarez, Legal Advisor to Chairman Wheeler, to discuss issues in the above-referenced proceedings.

NCTA and ACA expressed continued support for the goal of ensuring that consumers are informed about the capabilities and limitations of their voice service during power outages, and we stated that our members are open to discussing ways in which we could work with the Commission to facilitate the distribution of additional educational material. We explained that most voice providers also routinely offer battery backup capability to their customers at the time of installation of service and that it was reasonable to limit any regulatory obligations to this initial period of time. Conversely, it would be costly and burdensome for customers and providers if the Commission were to require providers to pay special visit to a customer's premises, for instance to monitor or replace batteries.

NCTA and ACA also explained that some companies have found that the best way to provision batteries for customers that want them is to have the battery shipped directly from the manufacturer. Such an approach can avoid significant costs and inefficiencies associated with storing batteries at a company warehouse and it ensures that the customer receives the correct battery for the customer premises equipment (CPE) that is installed in their home. The Commission should not adopt rules that would preclude companies from provisioning batteries in this manner. In addition, we explained that any mandate to offer batteries to consumers should include a transition period to ensure that all providers, especially smaller providers, have a sufficient supply of batteries and CPE to satisfy demand that results from new regulatory obligations.

Respectfully submitted,

/s/ **Steven F. Morris**

Steven F. Morris

cc: D. Alvarez