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June 25, 2015

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Policies to Respond to the Ongoing Technological Transition of Voice Networks, GN Docket No. 12-353

Dear Chairman Wheeler:

On behalf of The Leadership Conference on Civil and Human Rights (“The Leadership Conference”), we write to urge you to swiftly adopt protections to safeguard consumers, particularly the most vulnerable consumers who are represented by our members,¹ throughout the “technology transition.” The Leadership Conference is a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the rights of all persons in the United States. We are committed to ensuring that all communities have access to affordable, reliable, high-quality advanced communications services; and that workers in the industry have good jobs.

As noted by a number of other consumer and civil rights organizations, regulatory changes at the state level, reports of growing provider abandonment of copper lines, and network damage inflicted by natural disasters such as hurricanes, have increasingly left consumers without the means to maintain basic communications with 9-1-1 and other health and safety services in times of crisis. These concerns persist despite the widespread outcry regarding telephone service on Fire Island after Superstorm Sandy and the Commission’s initiation of this proceeding.

Without reliable technology, first responders and other providers of emergency services cannot receive time-sensitive calls for help or disseminate critical information to the public during emergencies. Unfortunately, history teaches us that people of color and low-income communities often suffer the most during natural disasters. Because these communities also often rely on traditional communications technology, including telephone service, during these moments of crisis, they are most at risk.

The Leadership Conference has urged the Commission to ensure that vulnerable users are protected during and after the technology transition, and to closely monitor the impact on those consumers.² In particular, two of the three principles we urged the Commission to consider centered on the maintenance of high-quality service and consumer protection. These principles stated that:



- High quality, affordable, and reliable voice and high-speed broadband services should be provided regardless of income, race, or geography.
- Long-established consumer protections should be maintained during and after the transition.

Not only are these services critical both in times of crisis and for essential everyday needs, but maintenance of these services also support high quality jobs.³

We therefore urge you to quickly adopt clear standards to protect consumers, particularly as they relate to possible loss of power and responses to service outages during the upcoming hurricane season, and to track the impact of the technology transition on all demographic groups, particularly low-income people, people of color, seniors, and residents of rural areas. The Commission must adopt rules that provide consumers with clear, enforceable rights so that it can adequately protect the American people's access to critical communications services.

We look forward to working with the Commission as this important technical transition takes place. Please contact Leadership Conference Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, United Church of Christ, OC Inc., at 202-904-2168 and Gabe Rottman, ACLU, at 202-675-2325, or Corrine Yu, Leadership Conference Managing Policy Director, at 202-466-5670, if you would like to discuss the above issues.

Sincerely,

Wade Henderson
President & CEO

Nancy Zinkin
Executive Vice President

cc:

Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly

¹ In the Matter of Technology Transitions Policy Task Force Regarding Potential Trials, GN Docket No. 13-5 (rel. May 10, 2013).

² Letter from The Leadership Conference on Civil and Human Rights to Marlene Dortch, Secretary, Federal Communications Commission (filed Oct 18, 2013, FCC Docket Nos. 13-5 and 12-353).

³ The Leadership Conference's third principle states: The Commission's policies should support economic activity, high-speed networks, and quality jobs.