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EX PARTE
VIA ELECTRONIC FILING

July 2, 2015

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

Re: In the Matter of AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transition Policy Task Force, GN Docket 13-5

Dear Ms. Dortch:

On Tuesday, June 30, 2015, Christopher Heimann, Joseph O'Bryan, Keylor Eng, Martin Dolly and the undersigned of AT&T met with Henning Schulzrinne, of the FCC's Office of Strategic Planning & Policy Analysis, Timothy Perrier and Christopher Anderson of the FCC's Public Safety and Homeland Security Bureau, Joanne Sechrest, Navin Jaffer, and Ryan Hedgpath of the Department of Homeland Security's Office of Emergency Communications (DHS/OEC), and Kenneth Carlberg of Leidos to discuss implementation of Government Emergency Telecommunications Services (GETS) over a VoIP platform.

As AT&T indicated in its TDM to IP wire center trial proposal to the FCC, GETS traffic prioritization has been engineered into AT&T's business VoIP offering allowing call prioritization across the IP and TDM networks but has not yet been engineered into the AT&T's consumer VoIP offering (e.g., U-verse). GETS calls will still complete across the consumer VoIP platform, but they will not be prioritized until they reach a portion of the network engineered for NS/EP priority, (e.g., the TDM network or the business VoIP platform). The proposal also noted that Wireless Priority Service (WPS) access is currently available through AT&T's Wireless Home Phone service.¹

In its February 16, 2015 *ex parte* letter,² AT&T proposed a potential interim solution to enable existing GETS subscribers that reside in either of the two trial wire centers to continue receiving priority calling services once they transition to AT&T's consumer VoIP platform. In particular, AT&T proposed to provide GETS subscribers residing in the trial wire centers

¹ See Letter from Christopher M. Heimann, General Attorney, AT&T Services, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket Nos. 13-5, 12-353 (filed Feb. 27, 2014).

² See Letter from Frank S. Simone, Assistant Vice President, AT&T Services, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket Nos. 13-5, 12-353 (filed Feb. 16, 2015).

wireless home phone service with WPS. It further proposed that this solution would remain in place until such time as the industry and DHS/OEC reach agreement on and deploy a long-term solution for enabling prioritized communications over consumer VoIP services. During Tuesday's meeting, AT&T confirmed that it does not view its proposed interim solution as a potential long-term, industry-wide solution for providing prioritized communications over IP networks and services. Rather, it is continuing to work closely with DHS/OEC on a long term solution that addresses interoperability with the many wireline consumer VoIP platforms that today are deployed by various providers throughout the country.

AT&T also provided FCC staff feedback regarding their proposal for an interim priority solution in the trial wire centers. That proposal, which staff indicated was intended to provide a basis for further discussions regarding potential long-term solutions for traffic prioritization over the consumer VoIP platform, contained the following elements:

Manual Mode

In manual mode, the end user device, probably through an ATA located on customer premises, dials the GETS access number. The SBC, redirects the call to a media server that gathers the PIN and destination number and then forwards the call, with RPH added, through the VoIP system. This models the legacy interaction.

Identity Based Mode

In identity-based mode, the system uses a database to validate which users, identified by the originating number, have access to NS/EP services. The caller, through a soft client, includes a SIP RPH in the SIP INVITE request. The database can likely be shared with WPS. The SBC authenticates the call, using standard DIAMETER protocol flows, and obtains a DIAMETER authorization AVP that indicates that the caller is authorized to use the GETS service.

AT&T expressed concern that the staff's proposal would not meet the following principles, which AT&T believes should guide development of any long-term solution:

- any long term solution should be standardized and interoperable across other VoIP providers;
- any solution should seek to leverage common platforms to ensure that it can be deployed in the most efficient and economical manner possible.

More specifically, AT&T observed that the staff's proposed solution raised the following issues:

- the proposed use of DIAMETER is not consistent with 3GPP IMS,
- current DHS/OEC requirements do not include supporting GETS on soft clients or the use of multifactor authentication for voice prioritization,
- OEC is currently supporting a wireline requirements update, an initiative that is necessary to achieve a consistent user experience and leverage service providers' existing network architectures to reduce costs for OEC as the industry transitions to a long term solution for the consumer VoIP platform, and

- the proposal's concept of moving priority signaling closer to the end user will involve extensive costs to update end user equipment and require industry consensus on the design requirements and specifications to which consumer electronics manufacturers must build this equipment.

For these reasons AT&T does not believe the staff's proposal is economically or practically feasible for deployment in the trial wire center trials. The WPS-based interim proposal AT&T initially suggested for use in the wire center trials is more appropriately suited for the small number of GETS subscribers that today reside in the trial wire centers. This approach makes even more sense when one considers the challenges that a GETS user today confronts in a U.S. marketplace where tens of millions of households already have transitioned to a consumer VoIP platform and an additional 45% of households have gone completely wireless.³ Allowing AT&T to employ its WPS-based interim solution in its trial wire centers, with the expectation that we will deploy the long term solution once DHS/OEC and the industry reaches consensus on the design requirements and specifications for wireline services, would do little to exacerbate the current marketplace capabilities of existing GETS subscribers.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this notice is being electronically filed in the above-captioned dockets. Please do not hesitate to contact me with any questions regarding this matter.

Sincerely,

/s/ Frank S. Simone

cc: H. Schulzrinne
T. Perrier
C. Anderson
J. Sechrest
N. Jaffer
R. Hedgpeth
K. Carlberg

³ See Blumberg SJ, Luke JV. Wireless substitution: Early release of estimates from the National Health Interview Survey, July–December 2014. National Center for Health Statistics. June 2015. Available from: <http://www.cdc.gov/nchs/nhis.htm>.