

Untitled

I second the comments of Wayne Brodtkin.

AT&T attempts to deflect its responsibility by continuously citing the decline in usage of a vital service as a valid reason for its discontinuance. However, in order to discontinue this service, AT&T must prove the service or a reasonable substitute is available.

AT&T, in its own response, outright admits it is not aware of any reasonable substitute or alternative, in its response (<http://apps.fcc.gov/ecfs/document/view?id=60001529290>) they state:

"Although AT&T is not aware of a replacement service for BLV/I functionality that is provided on legacy TDM voice services, the market indicates that there is no need for a replacement service."

The market, though, does not provide a reasonable substitute for this vital service.

I'd also like to note that while many PSAP/e-911, public safety and law enforcement commenters share this objection, that is not the only need for it. AT&T subscribers in rural areas generally do not have access to broadband internet, wireless cellphone service, texting and other services that the 'market' as AT&T points out has shown as a better way of communication. Due to the high cost of POTS service (As one commenter noted an over 164% rate increase in California) many rural customers can not afford alternative service features such as Call Waiting, and the only way to get through to these subscribers in an emergency is via the BLV/I service. While most BLV/I is utilized by law enforcement, other times family members may need to get through to a POTS subscriber who is UNAWARE an emergency else where has happened and the only way to notify these subscribers of the emergency is with the BLV/I service.

I again urge the FCC to block this proceeding as AT&T has failed to demonstrate there is a reasonable substitute and no other carrier has access to AT&T's subscriber lines to provide this service.