

I would like to voice my opposition to AT&T's proposal to modify the section 214 discontinuance process.

Their arguments for allowing these changes revolve around "sad sacking" the FCC with their dwindling residential subscriber base. These arguments are not new; they've been pitching regulatory adjustments to the FCC with this strategy since at least 2009, two years into their graph illustrating this decline. Since that time, the cost for even the most basic, flat rate landline service from AT&T has risen to \$24 a month in California (from \$10.69 in 2006 - a 164% rate increase, along with an equally steep increase for calling features; <http://www.latimes.com/business/hi/tziki/la-fi-hi/tziki-20160213-column.html>), and across their ILEC footprint, they've aggressively pushed Uverse Digital Voice and Wireless Home Phone on their POTS user base.

To add to this, 99% of the net broadband additions over the last quarter were to cable companies. AT&T has not only failed to compete in the broadband market, but has also lost the most users of any large broadband provider over this quarter: <http://www.leichtmanresearch.com/press/051616release.html>. Because of the lack of consumer awareness of the differences between the two technologies and the incredibly frequent practice of bundling, most users opt for the most obvious solution; to switch their phone service to the cable company when moving their broadband service.

So while wireline telephony is undebatably in a very difficult time, the circumstances for AT&T's jaw-dropping losses (made to look even bigger looking due to the many areas in states that've never been served by AT&T) anecdotally point more to a lack of interest on their part than their customers, and to some degree, uncertainty on whether or not the service is even still available: <https://www.dslreports.com/forum/r30766026-AT-T-POTS-or-Lifeline-phone-still-possible-on-copper-in-S-E-Michigan>  
<https://www.dslreports.com/forum/r30728902-Uverse-DSL-POTS>  
<https://www.dslreports.com/forum/r30685157->  
<https://www.dslreports.com/forum/r30575722-phone-line-and-DSL>

So from a company that has for nearly a decade, expressed a very high level of interest - arguably even spearheading the campaign to shut down the traditional wireline network, the addition of a clause allowing service to be removed when there's no longer any customers sounds more like an incentive than something to avoid. Furthermore, the company states in their proposal that they'd like to sunset support for devices such as low speed modems used in point of sale terminals, alarm systems, and other devices, and suggests without citation that their use is "rapidly dwindling". Most modems in such devices, due to the fast handshake time, cheaper/simpler production needs, and minimal amount of data required to be transferred, will connect at rates from 300 to 2400 bits per second, a small fraction of the speed even dial-up internet functions at. These modems will function resiliently under even some of the worst circumstances due to the relative simplicity of the modulation schemes employed. The fact that AT&T is pushing to move away from the obligation to support even this very basic requirement does not instill a lot of confidence in the quality of their planned replacement products, and also suggests they do not wish to encourage innovation on their network. I ask the Commission to keep in mind that the internet in and of itself was given birth to over the phone network. If phone service were not regulated for quality, there's a good possibility that it may not even exist today.

On the other side of the spectrum, Frontier's senior vice president of regulatory and government affairs stated "We love landline, we love broadband and we love Fios. It really fits within our DNA." briefly before acquiring part of Verizon's footprint; <http://www.pasadenastarnews.com/business/20160327/new-california-communications-company-will-keep-thousands-of-former-verizon-employees-hire-hundreds-more>. As the LA Times article notes, Frontier has kept their rates for phone service far below AT&T's, and had one of the highest broadband gains of any phone company in the last quarter. Given their significantly more enthusiastic attitude towards their phone

60002090325.txt

network, it seems reasonable to compare AT&T's subscriber base to Frontier's before accepting the conclusions they're suggesting.

For the reasons above, I respectfully recommend the FCC to not only reject AT&T's proposal, but like the California PUC, investigate their claims and compare them with other phone companies, along with the rates and quality of the service they provide.

Thank you.