8 July 2013

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

RE: GN Docket No. 13-5 Comments

Madam:

Enclosed for filing with the Federal Communications Commission please find comments on behalf of the Department of Defense and All Other Federal Executive Agencies in the above referenced proceeding.

Inquiries concerning this matter may be directed to the undersigned. Thank you.

Sincerely,

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Enclosure
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Technology Transitions Policy Task Force
Seeks Comment on Potential Trials

GN Docket No. 13-5

COMMENTS OF
UNITED STATES DEPARTMENT OF DEFENSE AND
ALL OTHER EXECUTIVE AGENCIES ("DoD/FEA")

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July 8, 2013
INTRODUCTION

The Secretary of Defense, through duly authorized counsel, on behalf of the telecommunications consumer interests of the United States Department of Defense and all other Federal Executive Agencies (collectively referred to herein as “DoD/FEA”) respectfully submits these opening comments in response to the Federal Communications Commission’s (“Commission’s”) May 10, 2013 Public Notice seeking comment on several potential trials relating to the ongoing transitions from copper to fiber, from wireline to wireless, and from time-division multiplexing (“TDM”) to Internet Protocol (“IP”).

In general, DoD/FEA embraces advances in telecommunications technologies and services, and applauds the efforts of the Commission and service providers to promote these advances and pursue a more efficient, reliable and functionally robust telecommunications network across the United States. DoD/FEA spends Billions of dollars on telecommunications services each year, and will to the extent possible take advantage of new technologies and services to increase efficiency and functionality.

The purpose of these comments, however, is to inform the Commission that DoD/FEA customers continue to rely heavily on wireline TDM-based networks and services and will do so for the foreseeable future. Therefore, the Commission should carefully consider potential adverse consequences on public safety and national security interests as a result of requiring DoD/FEA to prematurely transition to different technologies or services.

DOD/FEA TELECOMMUNICATIONS SERVICES

DoD/FEA purchases a wide array of telecommunications services through a number of acquisition processes.
First, the majority of telecommunications services provided to Federal government customers in the United States is purchased through the General Services Administration ("GSA") Networx program. Generally: the Networx contract is valued at $68.2 Billion over ten years and is responsible for providing telecommunications services to approximately 72,000 service delivery points and 3.7 million end users. Networx is comprised of two separate contracts: (1) the Universal contract (valued at $48.1 Billion), which was awarded to incumbent local exchange carrier ("ILECs") AT&T, Verizon and Qwest and covers primarily telecommunications services that have traditionally relied on TDM technology (e.g., basic voice, private line, circuit switched data, etc.); and, (2) the Enterprise contract (valued at $20.1 Billion), which was awarded to the three ILECs listed above plus Level 3 Communications and Sprint, and focusses on next-generation IP, wireless, and network security services and applications. The Networx contract is set to expire in 2017, and will ultimately be replaced by the Network Services 2020 (NS2020) program — a program in which a standardized IP-based telecommunications network infrastructure is being considered.\(^1\) Approximately 125 distinct Federal agency customers purchase telecommunications services through the Networx contract.

Another process is that some Federal government agencies (including the military service departments, such as, U.S. Army, U.S. Navy, U.S. Marine Corps, and U.S. Air Force) also purchase significant local, intraLATA services directly from service providers through competitively bid contracts which are independent of Networx. Oftentimes, these Federal government entities have a government-owned telecommunications switch at a particular location (at a military base, for example) and purchase TDM-based trunks and other business services to connect to the telephone company's central office.

The telecommunications services purchased under Networx and other contracts rely heavily on TDM technology. For example, it has been estimated that more than 50% of all "Fair Opportunity" awards\(^2\) for the years 2011 and 2012 rely on TDM-based technology and services. These services include basic voice, circuit switched data, toll-free, private line, and frame relay—all of which depend on the availability of TDM connections at the end user's location (service delivery point) and/or the availability of copper facilities. Likewise, the services purchased by Federal agency entities from other contracts typically include ISDN-PRIIs, circuit switched data and business access lines that are typically provisioned via TDM technology (and in some cases required to be provisioned via TDM technology by contract).

The telecommunications services purchased by these Federal agency customers generally support national security interests, public safety, Federal government operations and military readiness. TDM technology is used in official communications by a range of government sites, from large Federal office complexes and military installations to small store-front Social Security field sites, military recruiters and USDA Forest Service and Farm Service/Agricultural employees and agents. Another example is the Federal Aviation Administration ("FAA"), which reportedly relies on TDM technology and services 92% of the time for critical air traffic operations.\(^3\)

Preliminary indications are that certain functionalities DoD/FEA customers currently receive over wireline and TDM-based networks may not be available through wireless or IP-based networks. For instance, it is presently unlikely that there would be a suitable wireless-only alternative for the ISDN-PRI products that DoD/FEA purchases to serve DoD/FEA-owned switches. In addition, it has been previously indicated that non-TDM services do not provide the

\(^2\) The Fair Opportunity process is used under the Networx contract to select the best qualified vendor proposal based on statement of work requirements and evaluation plan.

\(^3\) Comments of Harris Corporation, GN Docket No. 12-253, January 28, 2013.
functionalities on which the FAA operational system currently relies and that non-TDM services
do not extend to many of the FAA’s remote locations.¹⁴

Given the magnitude and critical importance of the telecommunications services
purchased by Federal government entities and their reliance on TDM-based technology and
services, transitioning away from TDM to all-IP and/or wireless networks and services would be
an enormous undertaking. And if such a transition is undertaken, it must be done in a careful and
non-disruptive manner. Such a transition would take time to carefully manage and would require
significant (often unanticipated and dependent on the Federal budget process) funding in order to
upgrade or replace networks and customer premises equipment (e.g., PBXs, handsets, switches,
routers, gateways, etc.) and to properly train DoD/FEA personnel in the use and management of
the upgraded equipment, networks and services.

**POTENTIAL TRIALS, IF APPROVED, SHOULD BE SEAMLESS FOR DO/D/FEA**

If the FCC moves forward with real-world trials relating to transitions from copper to
fiber, from wireline to wireless, and from TDM to IP, then, from a DoD/FEA consumer
perspective, it is critical that, at a minimum, the trials be structured to include the following
attributes:

➢ There should be no forced “flash cut” for Do/D/FEA. In view of the critical functions
supported by the Federal government’s use of TDM-based networks and services – e.g.,
public safety, military readiness – it is imperative that Do/D/FEA not lose any service
functionality as a result of a trial. In sum, to the extent the FCC authorizes trials in areas
where Do/D/FEA customers are located, the participating local exchange carrier should
not be allowed to unilaterally require all customers in the LEC’s service territory trial

area to move to a wireless or IP-based product. Instead, the trials, if authorized, should be conducted in cooperation with and consent by DoD/FEA customers.\(^5\)

- **No functionality should be lost for DoD/FEA.** Given the critical mission of DoD/FEA communications systems, ILECs participating in a trial, if authorized, should be required to disclose any differences between DoD/FEA’s existing wireline services versus planned replacement services prior to an IP or wireless trial. This requirement will greatly assist DoD/FEA in analyzing any service functionalities that could be lost by a transition. This is particularly important for DoD/FEA that purchases more complex business telecommunications services (some of which depend on specialized customer premises equipment and need to fulfill highly specialized critical services) at thousands of locations across the United States. At least as it relates to DoD/FEA customers, a LEC should not be permitted to eliminate a service during any trial unless it can demonstrate that all service functionalities and required characteristics necessary for DoD/FEA customers will be preserved during and after the transition to a new technology.

- **DoD/FEA should be permitted to be involved in the trial selection process.** As mentioned above, any authorized trial would need to be closely managed by and coordinated with DoD/FEA because it would present potential impacts on critical missions, required functions and budget considerations for DoD/FEA. Therefore, DoD/FEA should be permitted to participate in the trial selection process so as to attempt...

\(^5\) DoD/FEA typically purchases telecommunications services out of contracts. The Networx contract expires in 2017 and other contracts that involve TDM-based services may extend past 2017. The trials must carefully consider the adverse impact on these contracts. In any event, the trials should not allow service providers to unilaterally decide to cease providing wireline and/or TDM-based services to DoD/FEA, as required by these contracts. This extends to both ILECs, who may be advocating for the real-world trials, as well as their competitors, which may purchase network elements from the ILECs in order to provide telecommunications services to DoD/FEA.
to minimize the potential disruption and transition costs such a trial would present for DoD/FEA.

CONCLUSION

DoD/FEA supports the promotion of newer telecommunications technologies and applauds the Commission’s efforts to ensure that any transition is well-managed. Indeed, these technologies present substantial benefits for DoD/FEA in the form of increased efficiencies and lower cost. At the same time, DoD/FEA continues to rely on wireline TDM-based services – critical to public safety and security – and will do so for the foreseeable future. As such, if the proposed trials are authorized, they should: (a) avoid any outcome that would eliminate services and/or functionalities DoD/FEA currently requires over wireline TDM technology, and (b) be absolutely seamless to DoD/FEA.

Respectfully Submitted By:

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