USTELECOM
THE BROADBAND ASSOCIATION

March 13, 2014

Ex Parte

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

Re: WC Docket No. 05-25

Dear Ms. Dortch:

This is to inform you that on March 11, 2014, I met with Daniel Alvarez, Legal Advisor to Chairman Wheeler, in connection with the docket identified above. The purpose of the meeting was to review the status of the pending mandatory data request and the challenges that have been pressed by various parties seeking to reduce the scope of data gathered by the Commission. The discussion was consistent with USTelecom's comments in opposition to NCTA's Application for Review previously submitted in this docket.

In this meeting, I emphasized that this is a market in the midst of a major transition in terms of technology, consumer demand and competition. One of these evolutions has been with respect to the role of the cable industry as aggressive competitors for business customers. Indeed, cable's role in this marketplace has been one of the most debated questions in connection with this proceeding and, in particular, the development of the pending data request. USTelecom previously has directed the Commission's attention to dozens of independent reports and analyses of cable's highly successful participation in the business services marketplace. Still, the cable companies themselves are in the best position to provide information necessary to resolve any remaining dispute. Accordingly, if this proceeding continues to move forward, it is essential that cable companies be required to provide the same detailed market data as other competitors in this marketplace.

Extent of Cable Business Services: Competitive local exchange carriers ("CLECs") have asserted on multiple occasions that cable companies do not offer competitive alternatives to incumbent local exchange carriers ("ILECs") high-capacity service offerings to business customers because their facilities are technologically inadequate or that the cable companies lack

the business acumen to serve such customers. For example, tw telecom has claimed (without substantiation) that cable networks "are not capable of providing the level of service (e.g., reliability, service guarantees) demanded by most business customers and delivered by special access."[1] And in a filing urging the Commission to ignore cable companies when defining the market for the provision of high-capacity services to businesses, a group of CLECs has asserted that cable broadband service does not satisfy the needs of small and mid-sized business customers, simply stating that cable networks "are simply not up to the task."[2]

Yet, somehow, the cable industry will exceed $10 Billion in business services revenues this year. The largest cable companies – which include companies that are much larger than many of the ILECs subject to special access regulation and required to respond to the data collection – had approximately ***$8.5 Billion*** in business services revenues in 2013.[3] For the sake of comparison, in its order suspending further grants of pricing flexibility, the Commission found that the 4 largest ILECs had combined revenues from the sale of DS1s and DS3s of approximately $12 Billion in 2010[4] -- a figure which by all accounts has been dropping.

Indeed, with respect to Ethernet services – the technology that businesses customers are rapidly adopting to replace traditional Time Division Multiplexing ("TDM") services – it is estimated that cable companies already have fully one-quarter of these service revenues nationally.[5] Moreover, given that cable companies already have facilities passing more than three-quarters of business locations[6], analysts are bullish that the cable companies' business services revenues will continue to grow at double-digit rates, as it has in recent years.[7]

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[1] Comments of tw telecom, WC Docket 05-25(Jan. 19, 2010).
[2] Workshop Response of tw telecom, One Communications, Cbeyond and Integra, (WC Docket 05-25, at 2-7 (Sep. 15, 2009).
[3] Light Reading, "Heavy Reading: Cable Biz Sales to Hit $8.5B" (Dec. 4, 2013*), available at* http://www.lightreading.com/heavy-reading-cable-biz-sales-to-hit-$85b/d/d-id/706824?f_src=lightreading_editorspicks_rss_latest ("Major US cable operators are on track to reach $8.5 billion in commercial service revenues this year, up more than 20% from nearly $7 billion a year ago.")
[4] *Special Access for Price Cap Local Exchange Carrier*, WC Docket No. 05-25, Report and Order, at p. 3 (rel. Aug 22, 2012).
[5] Light Reading, "Cable Commands Major Slice of Ethernet" (Sept. 5, 2013), *available at* http://www.lightreading.com/cable-video/cable-business-services/cable-commands-major-slice-of-ethernet/d/d-id/703696 .
[6] *See, e.g.,* Light Reading, "Cable's Cut of the Biz Services Pie to Eclipse $7B" (Nov. 29, 2012)(cable HFC networks already pass more than 75 percent of small and medium-sized business locations); Frost & Sullivan, "Cable MSO Ethernet Strategy: Moving Up-Market for New Opportunities," Vol. 6, No. 3 at p. 13 (March 2012) (noting that Comcast Business Class,

Bloomberg/BNA, for example, has projected that by 2017 cable companies will control: more than 40% of US small businesses; 30% of US Ethernet services revenues; and one-third of the wireless backhaul market.[8] And Bernstein Research put it this way more than a year ago:

> By now, the cable operators' growth story in commercial services is a familiar one. Collectively, Cable is adding $1 billion per year in incremental commercial revenue. On an organic basis, Comcast, Time Warner Cable, and Charter are collectively growing their commercial revenue stream at a 30% clip…So where are those revenues coming *from*? The TelCos obviously.[9]

During this meeting, USTelecom also referenced the most recent Vertical Systems Group ("VSG") analysis of the changing competitive landscape of the business services market. While CLEC tw telecom continues to be the third largest Ethernet provider in the country, behind only AT&T and Verizon (but ahead of regulated ILECs such as CenturyLink, Frontier, Fairpoint etc.), three of the next five largest Ethernet service providers are cable companies: Time Warner Cable, Cox and Comcast. Additionally, VSG's second tier of providers, its "Challenge Group," consists of 3 cable providers (Brighthouse, Charter and Cablevision) along with three CLECs. VSG explains that "cable companies have developed a winning formula for the U.S. business Ethernet market. They are successfully leveraging their on-net fiber footprints to offer aggressive pricing and rapid service provisioning."[10]

Impact of the Proposed Comcast – Time Warner Cable ("TWC") Merger: USTelecom further noted in this meeting that the proposed Comcast acquisition of TWC would even further upend the rankings of the largest providers of business services. Comcast's business services revenues alone increased more than 25% in 2013, to approximately $3.24 Billion--

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the commercial services division of Comcast, had facilities to at least 80% of the businesses in its territory).

[7] *See, e.g.,* Light Reading (Nov. 29, 2012) (projecting growth of at least $1 Billion per year for the next several years).

[8] Bloomberg BNA, "Cable Commercial Services Business Forecast 2012," p.3 (2012).

[9] Craig Moffett, Senior Analyst, Bernstein Research, "U.S. Telecom, Cable & Satellite – Monday Chart of the Week: The Flip Side of Cable's Growth in Commercial Services," (Dec. 10, 2012).

[10] Fierce Telecom, "Vertical Systems Group: 2013 U.S. Carrier Ethernet Leaderboard – Aggressive service pricing intensifies in metro markets and Cable MSOs gain ground" (Feb. 13, 2014), *available at* http://www.fiercetelecom.com/press-releases/vertical-systems-group-2013-us-carrier-ethernet-leaderboard .

despite having not even seriously entered the business until 2009. Even before this proposed merger was announced, one leading industry analyst predicted that Comcast "is virtually certain to become one of the market's largest players (very likely *the* largest)…"[11]

But Comcast's move to acquire TWC will immediately deepen its fiber and on-net building presence, with TWC having more than 860,000 on-line buildings an 8,700-mile regional fiber-based network.[12] Indeed, the combined companies would have more end-user connections nationwide than any other telecom provider and have "incumbent" networks in 43 of the top 50 MSAs – more than any other provider *including* AT&T and Verizon. In short, a post-merger Comcast would instantly be one of the largest providers of business services in the country, or as summarized by Fierce Telecom "a bigger business services force to be reckoned with."[13]

Network Capabilities: During this meeting, USTelecom also described the extent to which cable companies are able to offer service-level agreement ("SLA") business services over their existing cable plant. I emphasized that much discussion had occurred prior to the adoption of the data request concerning this question because of opposition from both cable companies and CLECs to proposals to collect information on the location of cable network facilities.

I explained that, in response to these objections, USTelecom had filed detailed information showing how cable companies market their business services as alternatives to traditional ILEC DS-1 and DS-3 services[14]; as well as information demonstrating that cable companies have long been able to deliver the equivalent of ILEC TDM-based dedicated connections over traditional hybrid fiber coaxial ("HFC") facilities.[15] None of this should have come as a surprise to the parties in light of the constant television and radio advertising by cable companies marketing their basic business services as an alternative to services offered by the

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[11] Heavy Reading Cable Industry Insider, "Cable Operators & Ethernet: Serious Market Share," (Aug. 2013), available at [] (italics in original); *See also*, Fierce Telecom, "Comcast Business gets MEF Carrier Ethernet 2.0 certification," (Feb. 18, 2013), *available at* http://www.fiercetelecom.com/story/comcast-business-gets-mef-carrier-ethernet-20-certification/2013-02-18?utm_medium=nl&utm_source=internal , ("Despite being a bit later to the Ethernet game than its MSO brethren…Comcast has quickly established itself as a threatening player in the business services market.")

[12] Fierce Telecom, "Comcast's TWC deal will deepen its medium business Ethernet niche," (Feb. 13, 2014), *available at* http://www.fiercetelecom.com/story/comcasts-twc-deal-will-deepen-its-medium-business-ethernet-niche/2014-02-13?utm_medium=nl&utm_source=internal.

[13] *Id.*

[14] *See,* USTelecom Ex Parte, WC Docket No. 05-25 (Nov. 29, 2012) (copy attached).

[15] *See,* USTelecom Ex Parte, WC Docket No. 05-25 (Dec. 3, 2012) (copy attached).

telephone companies. Indeed, as the Commission stated in a different proceeding more than a year ago, "… although many cable operators are relatively new entrants competing in the marketplace for the provision of telecommunications services to business customers, *cable operators have expansive – and in some areas ubiquitous – network facilities that can be upgraded to compete in telecommunications services markets at relatively low incremental cost.*"[16] Consistent with this fact, USTelecom provided Mr. Alvarez with a copy of a recent article demonstrating new technologies that are even further simplifying the ability of cable companies to deploy dedicated business services over existing HFC network infrastructure.[17]

End-User Data Collection: Finally, I noted in this meeting the recent ex parte filing from the law firm of Levine, Blaszak, Block and Boothby on behalf of the Ad Hoc Telecommunications Committee expressing concern about those parts of the proposed data request targeted to enterprise customers.[18] While the identity of Ad Hoc's members is unknown, it has been one of the most vocal proponents of extensive price regulation of ILEC special access services on the grounds that the prices for such services were too high and that there were no alternative providers. In its most recent ex parte seeking relief from the relatively minor data requests targeted towards enterprise customers, however, Ad Hoc now appears to suggest that they have no information that might provide insight into the questions raised by this proceeding. Specifically, Ad Hoc states that its member enterprise customers only purchase special access "indirectly" when purchasing interstate interexchange services from interexchange carriers. As a result, says Ad Hoc, its member companies have a "dearth of information" regarding the identity of the provider of the end point services they are utilizing.[19] I questioned how such a statement could be squared with Ad Hoc's prior attestations concerning pricing and alternative providers and urged the Commission to collect the previously proposed data from these end users to ensure consistency.

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[16] *Petition for Declaratory Ruling to Clarify 47 U.S.C. §572 in the Context of Transactions Between Competitive Local Exchange Carriers and Cable Operators*, WC Docket No. 11-118, *Order*, FCC 12-111, ¶ 28 (Sept. 17, 2012) (italics added).

[17] See, Light Reading, "Accedian Steps Up Cable Business Drive" (Feb. 19, 2014) (copy attached), *available at* http://www.lightreading.com/cable-video/cable-business-services/accedian-steps-up-cable-business-drive/d/d-id/707809.

[18] Ex Parte Letter from Colleen Boothby, Levine, Blaszak, Block & Boothby, WC Docket No. 05-25 (Feb. 21, 2014).

[19] *Id.*

Pursuant to Commission rules, please include this ex parte notice in the docket of the above-reference proceeding.

Respectfully submitted,

Glen Reynolds
Vice President, Policy

Attachments

cc: Daniel Alvarez

USTELECOM
THE BROADBAND ASSOCIATION

November 29, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25

Dear Ms. Dortch:

This *ex parte* letter responds to several recent filings in this docket urging the Commission to exclude data concerning "best efforts" business class broadband services from its proposed mandatory data request because these services "are not a substitute for the dedicated broadband services at issue in" this proceeding.[1] The Commission should reject these arguments.

Even a cursory review of cable company web sites demonstrates that these companies heavily market non-dedicated "best efforts" services to business customers, particularly small and mid-size businesses, by advertising them as superior substitutes to ILEC special access services.

To be clear, USTelecom is referring here to non-dedicated services that cable companies expressly market and sell to business customers, not services marketed solely for residential use. Each of the major cable companies has web sites exclusively targeted to business customers and a suite of services that they market to such customers under names such as "Comcast Business Class," "Time Warner Cable Business Class ©," "Cablevision Optimum Business ©," "Charter Business," and "Cox Business Internet." While cable companies today do include dedicated services as part of their suite of business offerings, they heavily market their "best efforts" high-speed services to small and mid-size business customers.

Anyone who spends any time listening to the radio or watching television has been exposed to advertising by cable companies urging business customers to switch from "telephone company" special access services to these non-dedicated high-speed business services. In fact, in many cases, these "best efforts" services are explicitly marketed as superior alternatives to

[1] *See, e.g., Ex parte Letter from Thomas Jones, Counsel for Cbeyond, Inc., EarthLink, Inc., and Integra Telecom, Inc.*, WC Docket No. 05-25 (Nov. 21, 2012); *Ex parte Letter from Thomas Cohen, Counsel, American Cable Association*, WC Docket No. 05-25 (Nov.26, 2012).

ILEC special access services. For example, Comcast's web site for its Business Class services expressly markets its broadband internet service against ILEC DS1 special access services, including statements such as "Business High Speed Internet speeds up to 66x faster than a T1."[2] Comcast's site includes a chart favorably comparing each of its levels of non-dedicated business services to T1 service, describing even its lowest-speed "Starter" service level as "Faster and more reliable than T1."[3] The same site also includes a business customer endorsement promoting that "With Comcast Business Class, we don't need a T1 line we can use the service that gives us quadruple the speed at a fraction of the price."[4] Each of the other major cable companies have similar "best efforts" services that they market as business-class alternatives to ILEC special access services. Indeed, Comcast, Cox, Charter and Time Warner Cable have a joint marketing effort called "BusinessCableDirect" which is focused on marketing non-dedicated cable business services as a substitute for special access service ("Cable vs T1") and asserting that these services are, quote:

- ✓ Much more affordable than T1
- ✓ Easier to install and maintain than T1
- ✓ Same secure & reliable as T1[5]

The fact is that cable companies have long been very successful in selling these "best efforts" services to small businesses in lieu of ILEC special access, and in recent years have extended that success up market. As a November 2012 market analysis from Frost & Sullivan summarizes,

> "Cable MSOs have always been highly competitive – even dominant – in the small business market and have finally reached critical mass up-market among mid-market and large local business."[6]

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[2] Attached. Available at http://business.comcast.com/smb/services/internet

[3] Attached. Available at http://business.comcast.com/landingpage/internet-b?CMP=KNC-IMPAQT-20120725-GOOGLE-36436028-9239624454&IQ_ID=36436028-VQ6-9239624454&utm_source=google&utm_medium=cpc&utm_campaign=Business%20Internet%20-%20NB%20-%20MBR&utm_term=36436028-+cable%20+internet%20+business&kw=%2Bcable%20%2Binternet%20%2Bbusiness&ad=9239624454&c=Business%20Internet%20-%20NB%20-%20MBR&iq_id=36436028-VQ6-9239624454

[4] *Id.*

[5] Attached. Available at http://businesscabledirect.com/index.php

[6] "Time Warner Cable Business Class Winning the Hearts and Minds of Business," Frost & Sullivan, p. 2 (Nov. 2012) ("Frost & Sullivan Report"), available at http://www.frost.com/sublib/display-report.do?ctxixpLink=FcmCtx1&searchQuery=time+warner+cable&bdata=aHR0cDovL3d3dy5mcm9zdC5jb20vc3JjaC9jYXRhbG9nLXNlYXJjaC5kbz9xdWVyeVRleHQ9dGltZSt3YXJuZXIrY2FibGVAfkBTZWFyY2ggUmVzdWx0c0B%2BQDEzNTQwMzEzODE2MzU%3D&ctxixpLabel=FcmCtx2&id=A314-00-7A-00-00

> "The success of this strategy is demonstrated in Frost & Sullivan survey results showing 23.5 percent of medium sized businesses using a cable MSO as at least one of their network providers."[7]

> "The mid-market today is a competitive and increasingly crowded 'jungle' for service providers."[8]

Cable's "best efforts" services may not be identical to ILEC special access – in fact they differ in many ways, including speed, price, and whether or not the connections are point-to-point. But the fact that one can identify distinguishing characteristics between services, such as "best efforts," is beside the point, as is the fact that customers in other market segments may also purchase the service. Rather, the critical question is whether these services are offered by the cable companies and accepted by some customers as competitive alternatives to ILEC special access. Obviously, their marketing efforts demonstrate that the cable companies believe these services are viewed as alternatives by at least some business customers. And once collected, the data will show that they are.

Of course, this is precisely why CLECs such as Cbeyond, EarthLink and Integra have urged the Commission not to collect such data from cable companies. Indeed, the competitors' push to exclude this data essentially asks the Commission to pre-judge the ultimate question of this entire inquiry – the scope and competitiveness of the business services marketplace.

Moreover, the Commission has acknowledged that an appropriate market analysis must not be limited to where competition exists today, but must also be "multi-faceted and forward-looking" and must examine "factors such as the potential for competitive effects, market entry, and potential competition…"[9] And as the Commission itself stated just weeks ago:

> "…although many cable operators are relatively new entrants competing in the marketplace for the provision of telecommunications services to business customers, cable operators have expansive – and in some areas ubiquitous – network facilities that can be upgraded to compete in telecommunications services markets at relatively low incremental cost."[10]

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[7] Frost & Sullivan Report at p. 9.
[8] Frost & Sullivan Report at p. 7.
[9] *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25, *Report and Order*, FCC 12-92, ¶101 (August 22, 2012).
[10] *Petition for Declaratory Ruling to Clarify 47 U.S.C. §572 in the Context of Transactions Between Competitive Local Exchange Carriers and Cable Operators*, WC Docket No. 11-118, *Order*, FCC 12-111, ¶ 28 (Sept. 17, 2012).

This recognition simply underscores the need to ensure that data concerning cable networks capable of providing business class services are fully and accurately captured to enable a forward-looking market analysis.

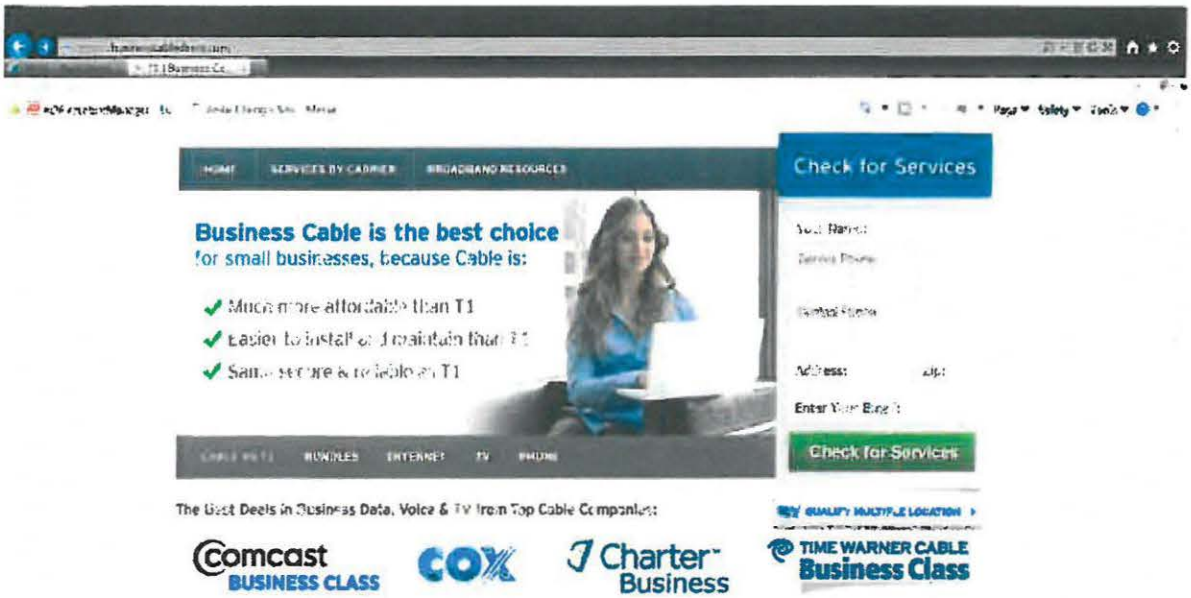
Finally, while USTelecom believes that it is indisputable that these non-dedicated business class services compete with special access, any doubt that remains must ultimately come down on the side of including such services within the scope of the data request. A decision to exclude such data at the initiation of this inquiry would severely undermine the Commission's ability to conduct a meaningful, fact-based statistical analysis of the market for business services.

Please do not hesitate to contact me if there are questions concerning this *ex parte* letter.

Sincerely,

Glenn T. Reynolds

cc: Michael Steffen
Angela Kronenberg
Christine Kurth
Priscilla Hill Argeris
Nick Degani
Julie Veach
Deena Shetler
Eric Ralph
Nick Alexander
Elizabeth McIntyre
Kenneth Lynch
Jack Erb
William Layton
Travis Litman
Luis Reyes
Matthew Porter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Cable Broadband has long offered high-speed broadband connections starting at 7 Mbps download and 1 Mbps upload speeds; but with the advent of DOCSIS 3.0 technology, cable broadband can now access the Internet at speeds as high as **100Mbps/10Mbps** at prices lower than T1 and DSL. Cable companies continue to push the outer limits of broadband and even higher speeds are expected by 2013.

Customers can enjoy additional savings by bundling their Internet service with digital television and digital voice offerings. This can mean even greater savings over the cost of T1.Integrated T1 and xDSL connections.

T1 service providers offer 1.544 Mbps download and upload speeds to their customers via a dedicated, point-to-point, or integrated connection to a digital circuit. However, T1 connections can be significantly more expensive than cable broadband or wideband connections. Monthly service fees can range from $500 to $1,000 per month.

Bandwidth and Speed

When it comes to bandwidth and speed, cable broadband is the one who wins the battle. Cable is capable of offering a speed that is almost 65 times faster than T1 & xDSL. **The speed and bandwidth battle is always won by the Cable Broadband**.

Cost

When it comes to cost, Cable is less expensive than T1 & xDSL. With the various package deals currently available, you can manage to reduce your phone bills to a great extent. Whether you are bundling or not Cable Broadband is a less expensive option that delivers far greater speeds. Therefore, in the pricing category Cable Broadband Service emerges as a winner.

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2 e-mail boxes Internet Security for up to 25 computers Microsoft Cloud Services Web hosting 30 Day Money Back Guarantee	8 e-mail boxes Internet Security for up to 25 computers Microsoft Cloud Services Web hosting 30 Day Money Back Guarantee	15 e-mail boxes Internet Security for up to 25 computers Microsoft Cloud Services Web hosting 30 Day Money Back Guarantee	20 e-mail boxes Internet Security for up to 25 computers Microsoft Cloud Services Web hosting 30 Day Money Back Guarantee
$69.95 mo.	$109.95 mo.	$199.95 mo.	$369.95 mo.
START ORDER	START ORDER	START ORDER	START ORDER

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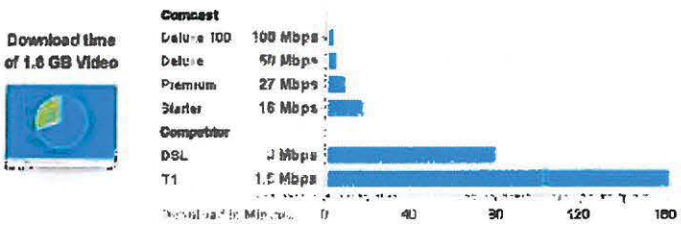

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- Microsoft Exchange Email Server
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Add to Your Internet Service

- Static IP Addresses
- Microsoft Outlook – Additional mailboxes
- Bundle Internet with another service for greater savings

"With Comcast Business Class, we don't need a T1 line we can use the service that gives us quadruple the speed at a fraction of the price"

George Mann, [illegible]

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MONEY BACK 30 DAY GUARANTEE

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December 3, 2012

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Special Access for Price Cap Local Exchange Carriers*,
WC Docket No. 05-25

Dear Ms. Dortch:

During a phone conversation discussing US Telecom's November 29 *ex parte* letter, Nick Degani of Commissioner Pai's office posed the question of the extent to which special access and similar services can be provided over hybrid fiber coaxial ("HFC") lines.

In response to this question, we submit the following information into the record. Since at least 2006, HFC lines have been capable of delivering the equivalent of ILEC TDM-based dedicated connections. In a 2006 technical specifications document describing Business Services over DOCSIS, Cable Labs explained, "Business Services over DOCSIS-TDM Emulation service (BSoD-TE) is a method for cable operators to deliver T1, E1 and NxDS0 emulation services that meet or exceed the quality requirement of applications that use such services."[1] The specifications document "describes the architecture and components of a network that delivers emulated T1 or E1 NxDS0 services over DOCSIS. It defines the T1, E1, or NxDS0 service delivered to the end customer, the requirements of a BSoD-TE compliant cable modem (TE-CM), the requirements of a BSoD-TE compliant CMTS (TE-CMTS), the requirements of the TDM Emulation Adaptor (TEA), and Pseudo Wires (PW) that cross the packet network connecting two EAs."[2] Figures 5-5 through 5-8 schematically display emulated T1 or E1 over HFC connections.[3] And cable companies like Charter Communications explicitly market Ethernet over coaxial facilities. Describing its Ethernet service for business on its website, Charter states, "All these sites can now be connected using standardized Ethernet services, delivered over fiber or coax."[4]

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[1] http://www.cablelabs.com/specifications/CM-SP-TEI-I06-100611.pdf, p. 1.
[2] http://www.cablelabs.com/specifications/CM-SP-TEI-I06-100611.pdf, p. 11.
[3] http://www.cablelabs.com/specifications/CM-SP-TEI-I06-100611.pdf, pp. 16-18.
[4] http://www.charterbusiness.com/charter-business-ethernet-main.aspx.

Therefore, special access and similar services can be provided over HFC lines.

Please do not hesitate to contact me if there are questions concerning this *ex parte* letter.

Sincerely,

Glenn T. Reynolds

cc: Nick Degani
Nick Alexander
Michael Steffen
Angela Kronenberg
Christine Kurth
Priscilla Hill Argeris

LightReading Networking the Telecom Community

Accedian Steps Up Cable Business Drive

NEWS ANALYSIS
ALAN BREZNICK,
Cable/Video
Practice Leader

2/19/2014

Seeking to boost its presence in the rapidly growing cable business services market, Accedian is introducing a small module designed to upgrade DOCSIS networks for Ethernet services such as mobile backhaul.

Accedian Networks Inc. says the new module, known as an antMODULE, can turn an ordinary cable modem into an Ethernet access device by using the power of network functions virtualization (NFV) offload technology. The antMODULE, an iPhone-sized device that sits behind the cable modem and can be remotely controlled, is designed to work in tandem with Accedian's virtualized network interface device (V-NID) to deliver Ethernet-quality services over coaxial cable lines without the need to add more fiber to the plant.

More specifically, Accedian says the antMODULE-V-NID combo will enable cable operators to deliver value-added, SLA-based services such as mobile backhaul over their coax lines. Further, the company says, by leveraging the power of the NFV offload engine, the new solution can execute complex Layer 2 and Layer 3 service performance assurance functions that are usually found only in costly test equipment.

"It allows cable operators to take their existing infrastructure, rejuvenate it, and offer business-class Carrier Ethernet service with reportable SLAs," Patrick Ostiguy, president & CEO of Accedian, told Light Reading. He called the solution "quite disruptive from a price-point perspective" because it allows operators to enhance their plant without a "forklift upgrade."

The product introduction by Accedian is notable because it's one of the first cable solutions to tap into the power of NFV. In general, the cable industry has moved much slower to embrace NFV and software-defined networking (SDN) technologies than the telecom sector so far.

The Accedian gambit is also significant because it signals a deeper plunge by the Montreal-based vendor into the swiftly growing cable business services market. Although Accedian has supplied mobile backhaul products over fiber lines to cable operators in the past, the company is now seeking to make a broader push into the commercial market by expanding its roster of products to cover the industry's coax networks as well.

Ostiguy said at least two North American cable operators are now testing and evaluating the antMODULE in their labs and systems, including one marquee MSO. Although he declined to name the operators, the marquee MSO is likely either Comcast Corp. (Nasdaq: CMCSA, CMCSK) or Time Warner Cable Inc. (NYSE: TWC).

Accedian sees a promising niche market for the new module in North America, Europe, and Asia as cable operators continue their business services expansion. Heavy Reading, our market research arm, projects that the US cable business services market alone could generate $10 billion in revenues for operators this year. (See Heavy Reading: Cable Biz Sales to Hit $8.5B.)

The big question is how much of that niche market Accedian can capture. "We think it could be a $300 million market opportunity," Ostiguy said. "Whether we could get X percent of it is speculative."

— Alan Breznick, Cable/Video Practice Leader, Light Reading

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