

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Technology Transitions	)	GN Docket No. 13–5
	)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition	)	GN Docket No. 12–353

To: The Commission

**COMMENTS OF ERICSSON IN RESPONSE TO AT&T’S  
PROPOSAL FOR WIRE CENTER TRIALS**

Ericsson hereby submits these comments in response to the Commission’s Public Notice<sup>1</sup> seeking comment on AT&T’s Proposal for Wire Center Trials.<sup>2</sup> Ericsson applauds the Commission’s efforts to speed the transition to all-IP networks and supports AT&T’s proposal for technology trials to provide all stakeholders with valuable information to ensure that the transition proceeds as smoothly as possible.

**I. INTRODUCTION**

In Ericsson’s vision for the Networked Society, we predict that by 2020 we will live in a world in which everything that can benefit from being connected, will be connected—a world with more than 50 billion connected devices. This vast scale will place huge demands on operators to increase capacity, rivaling the demand placed on networks during the Internet boom. The sheer scale of the challenge, given the demand for advanced personalized services, mobility, cloud services and machine-to-machine connections, goes well beyond simply adding additional capacity, nodes or service-specific technology overlays.

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<sup>1</sup> Public Notice, *Commission Seeks Comment on AT&T’s Proposal for Service-Based Technology Transitions Experiments*, DA 14–285 (Feb. 28, 2014).

<sup>2</sup> 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, at Attach. <http://apps.fcc.gov/ecfs/document/view?id=7521084094> (filed Feb. 27, 2014) (“*AT&T Proposal*”).

Ericsson believes that the most cost-optimized solution is a common converged network that can accommodate all types of users and services regardless of access technology, including digital subscriber line (“DSL”), fiber, LTE, 3G and Wi-Fi. This converged network has features such as common policy control and management to ensure that users enjoy optimal Quality of Experience (“QoE”) regardless of device. It is less expensive to plan, build, operate and maintain a single converged network than separate IP and TDM networks.

Thus, Ericsson fully supports the efforts of the Commission to speed market-driven technological transitions and innovations while preserving certain core values that have guided communication policy over the past century.<sup>3</sup> In the Networked Society everyone and everything will be connected everywhere in real time. A smooth and speedy transition to all-IP networks is crucial to enabling that connectivity and the opportunities that the Networked Society brings.

## II. DISCUSSION

As AT&T asserts, the IP Transition is already underway in many respects.<sup>4</sup> However, much work remains to be done, and completely switching out TDM infrastructure for all-IP infrastructure will not happen overnight. Identifying and resolving operational, technical, and logistical issues associated with the change in a controlled environment – as AT&T proposes to do in the Carbon Hill, Alabama, and Kings Point, Florida, wire centers – is a logical approach to tackle those issues.

Certainly, there are a number of complex and controversial issues to be addressed as TDM networks are phased out in favor of all-IP networks. But today’s proposed trials do not have to solve each and every issue to provide valuable information for the transition. Many

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<sup>3</sup> See *In the Matter of Technology Transitions, et al.*, GN Docket No. 13-5, *et al.*, Order, Report and Order and Further Notice of Proposed Rulemaking, FCC 14-5 at ¶ 1 (rel. Jan. 31, 2014) (“*Technology Transition Trials Order*”). See also *AT&T Proposal* at 7 (articulating support for the principles of Universal Connectivity, Consumer Protection, Public Safety, Reliability, and Competition).

<sup>4</sup> See *AT&T Proposal* at 2, 8.

issues, such as the regulatory matters associated with moving communications from well-established rules based on Title II of the Communications Act to an information-services regime, will be separately fleshed out over the coming months and years. As the Commission observes, the point of the trial is to examine operational challenges that may accompany a shift to all-IP networks, not to “resolve legal or policy debates.”<sup>5</sup> The Commission and the entire industry can help develop best practices in a larger scale transition through the benefits of the lessons learned through limited trials in the short term.

Ericsson supports the core values set forth by the Commission and AT&T as we move forward with IP transition trials. Public safety, universal connectivity, consumer protection, reliability, and ensuring competitive markets are all values important to Ericsson. Indeed, we are active on several of these fronts at the Commission and in other fora.<sup>6</sup> Protecting and promoting these values are necessary aspects of the IP transition as well as the move toward the Networked Society.

AT&T has set forth a detailed plan both for mapping TDM-based services to corresponding IP-based services, and in certain cases where current analog data devices and services are incompatible with digital wireless services, will develop enhancements to those

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<sup>5</sup> *Technology Transition Trials Order* at ¶ 25.

<sup>6</sup> *See, e.g.*, Comments of Ericsson, *Implementing Public Safety Broadband Provisions of the Middle Class Tax Relief and Job Creation Act of 2012, et al.*, PS Docket No. 12-94, *et al.*, at 1 (“Ericsson is committed to the vision expressed in the Act to establish a nationwide broadband public safety network based on an interoperable common air interface.” (filed May 24, 2013); *Technology for Good: Ericsson Sustainability and Corporate Responsibility Report 2012*, available at [http://www.ericsson.com/res/thecompany/docs/corporate-responsibility/2012/2012\\_corporate\\_responsibility\\_and\\_sustainability\\_report.pdf](http://www.ericsson.com/res/thecompany/docs/corporate-responsibility/2012/2012_corporate_responsibility_and_sustainability_report.pdf), at 13 (describing Ericsson’s role as the lead telecom partner in the Millennial Villages Project to highlight how connectivity can play a decisive role in fighting poverty in Africa); *Malaysia and the road to the Networked Society*, The Networked Society Blog, available at <http://www.ericsson.com/thinkingahead/the-networked-society-blog/2013/09/30/parting-thoughts-on-the-networked-society-in-malaysia/> (describing support for the transformation of Malaysia’s ICT industry which includes addressing concerns relating to fair competition and consumer protection) (dated Sept. 30, 2013); *Ericsson Mobility Report: On the Pulse of the Networked Society*, available at <http://www.ericsson.com/res/docs/2013/ericsson-mobility-report-november-2013.pdf> (attributing fast growth in LTE subscriptions in the U.S. to strong competition and consumer demand) (November 2013).

services that will allow for compatibility with those analog devices.<sup>7</sup> In addition, AT&T has set forth an customer outreach program made up of in-person briefings, social media campaigns, direct mailings, community meetings and microsites all aimed at providing information to consumers and businesses about the trials. The diligence behind the efforts should help ensure a successful trial with as few hiccups as practicable. Considering this care, planning and outreach and the importance of these trials in facilitating the IP transition, Ericsson encourages the Commission to permit the trials to move forward expeditiously.

### III. CONCLUSION

Ericsson appreciates the efforts of the Commission and AT&T to spur the transition to all-IP networks. As described above, a key component to fully realizing the vision of the Networked Society is a transition away from legacy TDM networks to all-IP networks. The proposal for trials in select wire centers will provide useful data to help smooth the transition as the IP-transition gains steam in the U.S. and worldwide.

Respectfully submitted,

**ERICSSON**

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<sup>7</sup> See *AT&T Proposal* at 20 (stating that AT&T is developing enhancements to “Wireless Home Phone with LTE” to allow operation with alarm monitoring, medical alert, and credit card processing applications).