

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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

**COMMENTS OF CENTURYLINK**

CenturyLink submits these comments in the above referenced matter<sup>1</sup> in response to the AT&T Proposal for Wire Center Trials (the AT&T Proposal).<sup>2</sup>

**I. INTRODUCTION AND SUMMARY**

The Commission, in this proceeding, invites proposals for experiments that will help “to speed market-driven technological transitions and innovations” while also preserving core values.<sup>3</sup> The AT&T Proposal falls squarely within the vision of the *Technology Transitions Order* and, indeed, focuses on one of the critical challenges of the IP transition – how to manage the myriad technical and logistical issues entailed with actually converting defined geographical areas entirely to IP. At the same time, it avoids any prejudging of the various important legal

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<sup>1</sup> *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Connect America Fund; Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Numbering Policies for Modern Communications*, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, GN Docket Nos. 13-5 and 12-353, WC Docket Nos. 10-90 and 13-97, CG Docket Nos. 10-51 and 03-123, FCC 14-5, rel. Jan. 31, 2014 (*Order or Technology Transitions Order*).

<sup>2</sup> See Public Notice, DA 14-285, rel. Feb. 28, 2014, Commission Seeks Comment on AT&T’s Proposal for Service-Based Technology Transitions Experiments, GN Docket Nos. 12-353 and 13-5. AT&T Proposal for Wire Center Trials filed Feb. 27, 2014 and detailed Wire Center Trial Operating Plan and supporting exhibits (Trial Operating Plan) filed Feb. 27, 2014.

<sup>3</sup> *Order* ¶ 1.

and policy questions arising from the technology transitions. It also appears to provide adequate supporting detail along the precise lines specified in the *Technology Transitions Order* for service-based experiment proposals. Some continued caution and attention is warranted with any trial proposal such as this, primarily because important details associated with the later stages of the trial are yet to be resolved. But, CenturyLink supports the approach proposed by the AT&T Proposal.

## II. DISCUSSION

- ***The AT&T Proposal Focuses On A Critical Challenge of the IP Transition***

By seeking “to replicate on a small scale the broader TDM sunset and migration to all-IP networks and services,”<sup>4</sup> the AT&T Proposal focuses on a critical challenge presented by the broader IP transition.

The *Technology Transitions Order* rightly anticipates a “tipping point” coming in the not-too-distant future where the adoption of new communications technologies will reach a critical mass and most providers will seek to cease offering legacy services.<sup>5</sup> Different providers will likely get to this stage on somewhat different timelines in different geographical areas. And, each will necessarily navigate their own unique path to this tipping point to some extent. Among other things, each operates with different capital resources and manages different platforms and technologies. But, every provider will face the challenge at some point of actually converting defined geographical areas entirely to IP. It is precisely because of this coming challenge that the *Order* invites proposals for “voluntary service-based experiments” that “will examine the

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<sup>4</sup> Trial Operating Plan, p. 2.

<sup>5</sup> *Order* ¶ 3.

impacts of replacing existing customer services with IP-based alternatives in discrete geographic areas or ways.”<sup>6</sup>

The AT&T Proposal responds directly to that invitation and will provide an important test bed for an essential stage in the IP transition that will present a large number of technical and logistical issues. For any given geographical area, not only must the necessary IP functionality be put in place, but consumer and business customers must be transitioned from the multitude of TDM-based services that they currently rely upon and the discontinuance of underlying TDM networks and services must be managed. Past technology transitions have demonstrated that early planning and testing is invaluable in assuring the smoothest possible transition.

- ***The AT&T Proposal Avoids Any Prejudging of Legal and Policy Questions***

The AT&T Proposal also appears to successfully avoid any prejudging of the outstanding legal and policy questions related to the IP migration.

By way of example, related to the core value of “competition,” the *Order* specifies the following condition related to maintaining wholesale access:

Consistent with requirements stated above, experiments must be initiated in a manner that, to the extent that wholesale customers are involved, invites such customers to participate voluntarily. After successful initiation of an experiment, the Commission is prepared to consider additional requests to implement a phase of an experiment that authorizes the withdrawal of existing services to wholesale customers.<sup>7</sup>

The *Order* also includes conditions and presumptions, respectively, expressly requiring that the status quo for interconnection and intercarrier compensation be maintained.<sup>8</sup>

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<sup>6</sup> *Id.* ¶ 5.

<sup>7</sup> *Id.* ¶ 59.

<sup>8</sup> *Id.* ¶¶ 61-63.

The AT&T Proposal complies with each of these requirements. AT&T commits to maintaining existing wholesale arrangements for existing TDM network facilities while making clear that those obligations will have to be revisited in the second phase of the trial when those TDM facilities are discontinued.<sup>9</sup> In the meantime, participation by wholesale customers in the first part of the trial is voluntary only.<sup>10</sup> Similarly, AT&T promises that interconnection arrangements for existing TDM facilities will not be impacted and that interconnection to new IP facilities will be accomplished through arrangements already available in the market.<sup>11</sup> AT&T rightly leaves debates regarding the potential application of section 251 to IP networks and routing and points of interconnection in an all-IP world outside the scope of the trial.<sup>12</sup> Finally, AT&T assures that nothing in the proposal entails any change from the status quo when it comes to intercarrier compensation -- in other words, it also leaves policy debates about compensation between providers in an all-IP environment outside the scope of the trial.<sup>13</sup>

- ***The AT&T Proposal Provides Adequate Supporting Details***

The AT&T Proposal also appears to provide adequate detail about the proposed design of its trials.

To begin with, AT&T's plan addresses each of the factors identified in the *Technology Transitions Order* as likely to be important to the Commission's evaluation of any given

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<sup>9</sup> Trial Operating Plan, pp. 45-47.

<sup>10</sup> *Id.* p. 47.

<sup>11</sup> *Id.* pp. 47-48.

<sup>12</sup> *See, e.g., id.* at n. 99.

<sup>13</sup> *Id.* pp. 49-50.

experiment.<sup>14</sup> AT&T explains that its trial contemplates the replacement of the vast majority of TDM-based services in two trial centers over a three-year period.<sup>15</sup> It proposes that this occur in two stages.<sup>16</sup> In the first phase, AT&T would grandfather existing customers and offer only next generation wireless and wireline IP-based services for new orders.<sup>17</sup> In the second phase, existing customers would upgrade to those new services as well.<sup>18</sup> AT&T provides extensive detail about the demographics of the two wire centers and its planned public outreach to support the trial.<sup>19</sup> It also details the customer notice procedures to be followed for each stage of the trial.<sup>20</sup> Additionally, it itemizes each TDM-based product and service expected to be grandfathered and ultimately eliminated and each IP-based product and service that will replace them.<sup>21</sup>

AT&T also provides a thorough discussion in its plan demonstrating how the trial will satisfy the “value-based conditions, presumptions and relevant factors” that the Commission has said it will use to evaluate proposals.<sup>22</sup> In addition to the commitments discussed above related to the Commission’s “competition” core value, AT&T describes at length how it will satisfy any

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<sup>14</sup> *Order* ¶ 34.

<sup>15</sup> Trial Operating Plan, pp. 1-2, 12, Exhibit D.

<sup>16</sup> *Id.*

<sup>17</sup> *Id.* pp. 1-2.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.* pp. 3-10, 17-20, Exhibits A-C.

<sup>20</sup> *Id.* p. 20.

<sup>21</sup> *Id.* pp. 12-16, Exhibit E.

<sup>22</sup> *Order*, Appendix B, ¶ 1.

concerns related to the other core values identified in the *Order* -- public safety and national security, universal access, and consumer protection.<sup>23</sup>

- ***Appropriate Attention Must Be Given To Details Yet To Come***

As noted above, some continued caution and attention is warranted with any trial proposal such as this. This is primarily because important details associated with the later stages of the trial are yet to be resolved. AT&T's assurances discussed above regarding its intent to avoid any impact to open debates about interconnection and compensation and the like go a long way toward assuring that concerns will not arise. But, some attention will need to be given to details yet to come -- particularly in the second phase of the proposed trial.

Respectfully submitted,

**CENTURYLINK**

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<sup>23</sup> Trial Operating Plan, pp. 20-55.