

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

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

REPLY COMMENTS OF CHARTER COMMUNICATIONS, INC.

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Charter Communications, Inc. (“Charter”) hereby submits the following reply comments to the Commission’s February 28, 2014 Public Notice seeking comment on AT&T’s February 27, 2014, proposal to conduct experiments in two AT&T wire centers—in Carbon Hill, Alabama and Kings Point, Florida—in which TDM-based services would be transitioned to IP- and wireless-based services.¹ Charter has been providing its own IP-based voice and data services around the country for many years, including in Carbon Hill. Charter submits these reply comments not to criticize AT&T’s efforts to deploy IP services in Carbon Hill and King’s Point, but instead to note AT&T’s failure to offer any plan or timeline to provide the service most essential to the IP transition—IP interconnection for voice services—anywhere.

As many commenters have already noted, the AT&T proposal addresses only a small portion of the IP transition—how LECs still using TDM-based technologies in portions of their networks transition their customers to IP-based services at the retail level.² Although many ILECs have been slow to undertake this transition, the technology and logistics of providing

¹ FCC Public Notice, GN Docket Nos. 12-353 and 13-5, *Commission Seeks Comment on AT&T’s Proposal for Service-Based Technology Transitions Experiments*, DA 14-285 (Feb. 28, 2014) (“Public Notice”).

² See, e.g., Comments of T-Mobile USA, Inc. at 3-4 (Mar. 31, 2014) (noting “limited utility” of AT&T’s trial given lack of focus on important questions such as IP interconnection).

retail voice services to customers in IP are well-known and well-understood. Facilities-based Voice over Internet Protocol (VoIP) providers, including Charter, have already been providing such services for the better part of a decade. Moreover, a number of today's facilities-based IP providers that previously offered TDM-based voice services before making the investments to upgrade their networks have demonstrated how to successfully transition to an IP-based network. Therefore, it is unlikely that the AT&T trial will shed much new light on the related technical issues.

Charter, however, agrees with commenters who have pointed out a critical area where AT&T, in these proposed experiments and elsewhere, has been conspicuously silent – the provision of IP interconnection to other carriers.³ This is the real bottleneck to a nationwide IP transition. As Charter has emphasized to the Commission in the past, the reluctance of ILECs to offer IP interconnection to competitive carriers, or to offer it on reasonable terms, is significantly inhibiting the IP transition.⁴ The lack of IP interconnection means companies that have invested in IP, like Charter, must maintain numerous inefficient TDM-based interconnection points with ILECs, raising costs and limiting the ability to offer advanced IP-based features.

As ILECs increasingly move their own networks more fully to IP, as AT&T proposes for its Carbon Hill and Kings Point wire centers, it becomes increasingly clear that there is no good technical reason for those ILECs to withhold IP interconnection from competitive carriers eager to interconnect in IP under existing federal rules. Instead, forcing competitive carriers to incur the costs of interconnecting in TDM—even when the ILEC itself uses IP within its own

³ See, e.g., Comments of Competitive Carriers Association at 4-5 (Mar. 31, 2014) (noting that AT&T Proposal fails to describe wholesale IP services it will offer after transition); Comments of Sprint Corp. at 3-4 (Mar. 31, 2014) (noting that trial fails to address important question of IP interconnection).

⁴ See Reply Comments of Charter Communications, Inc., GN Docket No. 13-5 (Aug. 7, 2013), at 2-3 (citing sources).

network—operates as little more than an effort by ILECs to force competitors to waste resources and limit their ability to offer advanced IP-based features.

As Charter and others have emphasized to the Commission, meaningfully advancing the IP transition will require ILECs to offer IP interconnection on reasonable and nondiscriminatory terms. The Commission can best further that goal by clarifying that the interconnection obligations of Sections 251 and 252 of the Communications Act apply equally irrespective of the technology used, and—at a bare minimum—require ILECs to offer interconnection in IP when they use IP to provide connections to *themselves*, such as for retail service (like in Carbon Hill and Kings Point).⁵ The increasing transition of ILEC networks to IP at the retail level simply reemphasizes the need for the Commission to act promptly in making this clarification, so that the IP transition can move forward in a timely manner. This will reduce costs for all carriers, promote competition, and improve the quality of service to consumers.

CONCLUSION

Charter continues to urge the Commission to take the steps needed to move the marketplace towards IP interconnection—including acting to clarify that Sections 251 and 252 of the Communications Act govern IP interconnection for managed VoIP traffic.

⁵ See, e.g. Reply Comments of Charter Communications, Inc., GN Docket No. 12-353 (Feb. 25, 2013), at 4-6; Comments of Charter Communications, Inc., WC Docket 10-90 et al., at 3-9 (Feb. 24, 2012); Comments of Cablevision Systems Corp. and Charter Communications, Inc., WC Docket No. 11-119 (Aug.15, 2011); Reply Comments of Charter Communication, Inc., WC Docket No. 10-90 et al., at 8-9 (May 23, 2011).

Respectfully Submitted,

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