



Brian Benison  
Director  
Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036

T: 202.457.3065  
F: 202.457.3070

May 8, 2014

**Electronic Submission**

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

Re: *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; *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208

Dear Ms. Dortch:

On May 6, 2014, Hank Hultquist, Christi Shewman and I of AT&T Services, Inc. with Matthew DelNero, Deena Shetler, Jamie Susskind, Kalpak Gude, Pam Arluk, William Layton, Thomas Parisi and Tim Stelzig of the Wireline Competition Bureau to discuss the Iowa Network Services (INS) proposal<sup>1</sup> for a trial related to the IP transition.

As we noted in our comments, it is hard to perceive the current role for a centralized equal access (CEA) provider when the concept of equal access itself is going the way of the dinosaur.<sup>2</sup> The legacy model in which the INS network recovers its costs through tariffed access charges is unsustainable in the all-distance world where VoIP traffic will be exchanged without regard to local, LATA, or state boundaries. Accordingly, AT&T urged the Commission to consider the implications of this change for CEA providers and the industry as a whole. AT&T recommended that the Commission consider, among other things, clarifying the section 214 authority under which the CEAs operate to eliminate any argument that interexchange carriers must connect to rural carriers in CEA states exclusively through the CEA rings. In addition, the Commission should consider mandatory detariffing of CEA services to foster the development of commercial solutions. Finally, AT&T explained that there is no merit to the CEAs' arguments that none of the rules adopted in the *USF/ICC Transformation Order* apply to CEAs' access charges.

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<sup>1</sup> See Application of Iowa Network Services, Inc. for Authority to Conduct a Service-based Experiment Concerning the TDM-to-IP Transition for Centralized Equal Access Service, GN Docket No. 13-5 (filed Feb. 20, 2014).

<sup>2</sup> See AT&T Comments, GN Docket Nos. 13-5, 12-353 (filed Mar. 21, 2014).

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If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Brian J. Benison

cc: Matthew DelNero  
Deena Shetler  
Jamie Susskind  
Kalpak Gude  
Pam Arluk  
William Layton  
Thomas Parisi  
Tim Stelzig