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Unfortunately, it would seem we've come to a time when consumers and local exchange carriers are at a conflict of interest. Some incumbent carriers have used misleading statements to push their transition proposals forward. For example, AT&T has stated numerous times that current regulatory conditions are forcing them to maintain outdated equipment. However, readily available regulatory documents (<https://ebiznet.att.com/networkreg/>) show that they are busily consolidating their equipment, and even replacing it with brand new, next generation equipment that can readily support traditional landline services.

Inversely, the Session Initiation Protocol, one of the most widely used voice over IP standards, has been standardized since 1996 (http://en.wikipedia.org/wiki/Session_Initiation_Protocol#History), and can work with the currently deployed traditional switching systems by way of a packet gateway interface card or similar product.

Furthermore, in cases such as Verizon in Manhattan, companies have been using fiber buildouts to the customer's premises as an excuse to resist or entirely stop offering regulated traditional landline service, in spite of their previous doing so in Verizon's case, since FiOS' inception. Instead, they offer unregulated "digital voice" service, much like uVerse phone service, which don't increase their access line count. In some irony, the mobile telephone switching offices powering many of our cellular phones, and even Voicelink phones which Verizon has deployed as a landline replacement product, is very frequently a legacy switching system such as a 5ESS or a DMS-100, which the incumbent carriers have complained loudly about having to maintain for their wireline operations.

Finally, despite these carriers' hesitations to offer traditional landline service to customers, they have used a declining access line count to support their proposals to shut down their networks. The latest Center for Disease Control and Prevention study (<http://www.cdc.gov/nchs/data/nhsr/nhsr070.pdf>) indicates that the decline in landline usage has slowed considerably, with the last recorded six month period showing a decline of 1.2 percent; the lowest decline in six years.

Given the aforementioned statements, I would like to respectfully request the commission to review the claims of these carriers, as they currently stand to not just put consumers at a large disadvantage, but replace a PSTN that has given birth to residential internet access, delivered an unmatched level of reliability and call quality, and transformed telephony from a monopoly into a strong, competitive, and innovative marketplace. All in the name of one that has shown dubious ability to do so at best.