

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to
Consider Changes to the Commission's
Carrier of Last Resort Rules.

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**REPLY COMMENTS OF THE UTILITY REFORM NETWORK ON THE
ADMINISTRATIVE LAW JUDGE'S RULING REGARDING COMMENTS ON TOPICS
DISCUSSED AT AUGUST 22, 2025 WORKSHOP**

(PUBLIC VERSION)



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I. INTRODUCTION

Pursuant to the schedule established in the October 1, 2025, *Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop* (Ruling) and the October 20, 2025, *E-Mail Ruling on Frontier/Consolidated/TDS Request for Extension*, The Utility Reform Network (TURN) timely submits these reply comments in response to other parties' opening comments on the Ruling.

As predicted in TURN's joint opening comments with the Center for Accessible Technology, several providers attempt to oversimplify issues raised in the panels at the August 22, 2025, workshop and argue for policies that would facilitate large-scale, rapid COLR withdrawals. The Commission should continue to approach their claims with a healthy amount of skepticism while considering the perspectives and concerns of the people, governments, and businesses likely to be affected by COLR withdrawals.

II. FEDERAL POLICY

A. Near-future changes to federal Section 214 discontinuance rules will not result in adequate consumer protections.

In the Federal Policy section of its comments, AT&T concludes that “the F[ederal] C[ommunications] C[ommission (FCC)]’s Section 214 discontinuance rules ensure that customers retain access to reliable voice communications services when an [incumbent provider (IILEC)] discontinues POTS.”¹ AT&T made a variety of assertions which boil down to a position that California should not worry about COLR withdrawal because “the FCC has it covered” with its Section 214 process. However, AT&T glosses over serious deficiencies in the FCC Section 214 process, which makes it completely inadequate for replacing the Commission’s jurisdiction over

¹ AT&T California’s Opening Comments on ALJ’s Ruling Regarding Comments on Topics Discussed at August Workshop (AT&T Opening Comments), filed Nov. 21, 2025, at p. 8.

the crucial question of discontinuing basic service in California. These deficiencies mean the FCC Section 214 process will not ensure California consumers retain access to basic service.

The Section 214 process is in flux and subject to change with a pending Notice of Proposed Rulemaking² in which the FCC is poised to eliminate many of the current regulations that AT&T claims will “ensure customers retain access to reliable voice communications services when an ILEC discontinues POTS” by “forbear[ing]” from applying previous regulations. TURN’s Opening Comments noted that the proposed regulations appear to be “hastily constructed . . . to automatically approve providers’ applications to eliminate services for copper-based POTS customers.”³

For example, the FCC proposes forbearance from applying Section 214 discontinuance requirements based on the (purported) availability of alternative service providers or networks.⁴ The Commission can make its own assessment of the likelihood of automatic approval of individual provider Section 214 applications that likely will result from the final decision by the FCC in its NPRM, but TURN believes “automatic” approval of provider applications by the FCC is a significant possibility.

Under current Section 214 rules, “the [Wireline Competition] Bureau will generally authorize [service] discontinuance ‘unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience is otherwise affected.’”⁵ According to the FCC’s NPRM, basic service substitutes are to be assessed using

²*In re Reducing Barriers to Network Improvements and Service Changes, Accelerating Network Modernization*, Notice of Proposed Rulemaking (FCC NPRM), WC Docket Nos. 25-209, 25-208, FCC 25-37 (rel. July 25, 2025).

³ Opening Comments of TURN and CforAT on the ALJ’s Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop (Joint Commenters Opening Comments), at p.6.

⁴ FCC NPRM at para. 37.

⁵ FCC NPRM at para. 22.

the “Adequate Replacement Test” or the “Alternative Options Test,” depending on the circumstances.⁶ The NPRM proposes to do away with the tests altogether or grant “forbearance relief in certain contexts.”⁷ This proposed change would be combined with a notice period that is already limited, and the FCC’s proposals would further limit or eliminate altogether, giving customers little opportunity for awareness of the proposed changes, let alone respond to the proposed change to service. Either result of the NPRM would render AT&T’s suggestion that the Section 214 process will protect basic service customers in California a nullity.

Even if the FCC retains the alternative replacement and alternative option tests, another significant reason to not rely on FCC Section 214 rules to protect California basic service customers is *what* the FCC rules will permit as an “alternative service” for basic service consumers versus what are actually be a substitutable equivalent for basic service. The Commission is well-aware of the pressure from COLRs to simply proclaim that wireless and IP-based services are ubiquitously available, making them acceptable “alternative services.”⁸ This assumption is faulty and not one which the Commission should accept or entertain.

Another significant inadequacy of FCC Section 214 rules is illustrated by AT&T’s contention that “[g]overnment fixed and mobile broadband maps generally, and the FCC’s National Broadband Map in particular, are the best-available evidence to demonstrate the presence of other voice providers”⁹ (for the “adequate replacement” or “alternative options” tests). The FCC Section 214 process relies on these maps, which have been demonstrated to be too inaccurate to rely on for the critical decision of discontinuing basic service for consumers

⁶ FCC NPRM at paras. 23-24.

⁷ FCC NPRM at para. 25.

⁸ *See, e.g.*, AT&T’s statement in its opening comments that “almost all Californians find fixed or mobile broadband networks deliver voice services that reliably meet their communications needs – including for emergency communications.” AT&T Opening Comments at p. 1.

⁹ AT&T Opening Comments at p. 25.

who rely on basic service. TURN, the Center for Accessible Technology (CforAT), and the Public Advocates Office (Cal Advocates) have demonstrated the deficiencies of these broadband maps, particularly the wireless broadband maps due to the variabilities in radio propagation and coverage.¹⁰

It is especially problematic for a decision of this importance that the FCC maps do not have the granularity required to demonstrate voice service availability at the *address level*. The FCC itself states broadband coverage provided by wireless service is estimated by mobile providers themselves: “Mobile providers generate the 3G, 4G LTE, and 5G-NR coverage areas shown on the map using propagation modeling, where the models include certain common settings for consistency. The coverage areas are meant to represent the areas where a user should be able to establish a mobile connection, *either outdoors or moving in a vehicle*, and achieve certain upload and download speeds.”¹¹ The FCC’s map does not include information on the availability of mobile wireless broadband service *while indoors*. “Because the FCC’s coverage map is based on propagation modeling, *a user’s actual, on-the-ground experience may vary due to factors such as the end-user device used to connect to the network, cell site capacity, and terrain*.”¹²

On its face, this FCC disclaimer makes reliance on the FCC’s mobile broadband mapping

¹⁰ See, e.g., Amended Initial Proposal of TURN, The Communications Workers of America, District 9, and Regarding the OIR to Consider Changes to the Commission’s COLR Rules (Joint Commenters Amended Initial Proposal), filed Oct. 17, 2024, at pp. 33-34; Opening Comments of the Public Advocates Office on the ALJ’s Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop, filed Nov. 21, 2025, at pp. 9-10.

¹¹ FCC, What’s on the National Broadband Map (last updated Nov. 25, 2025), available at <https://help.bdc.fcc.gov/hc/en-us/articles/13532984820379-What-s-on-the-National-Broadband-Map> (emphasis added).

¹² FCC, What’s on the National Broadband Map, (emphasis added). Wireless providers make similar disclaimers on their marketing maps. See, e.g., AT&T, AT&T - Wireless Coverage Map for Voice and Data Coverage, available at <https://www.att.com/maps/wireless-coverage.html> (last accessed Dec. 3, 2025).

unsuitable for determining the presence of alternative voice services. The FCC’s mobile broadband maps are especially unsuitable when determining access to 911 emergency services, since the FCC mobile broadband maps do not address one of the most crucial factors of basic service: the ability to reach 911 operators from *inside* the home or premise. Further, there is a difference between broadband and voice service connectivity in that voice services are less tolerant of connectivity interruptions. Voice calls can drop or fail due to such interruptions. For emergency communications, the FCC’s broadband maps are simply not reliable enough to support a conclusion that an area is “well served.”

B. Regardless of any Section 214 actions, the Commission can and should enforce COLR requirements in California.

The Commission asked parties to address the impact of the FCC’s Section 214 discontinuation process on COLR obligations, whether parties should assume that a COLR granted relieve from its obligation to provide service in a given area is also likely to receive “fast track” approval from the FCC, and whether FCC Section 214 approval should be a precondition for applying for COLR withdrawal.¹³ AT&T and US Telecom both argue that that Section 214 approval should not be a prerequisite for COLR withdrawal.¹⁴ Frontier and Consolidated observe that the CPUC COLR process and the FCC’s Section 214 service discontinuation process are separate processes¹⁵ and that are “neither coextensive nor interdependent.”¹⁶

TURN believes that the Frontier’s and Consolidated’s positions on this limited question

¹³ Ruling at p. 3

¹⁴ AT&T Opening Comments at p. 6; Comments of USTelecom on ALJ Ruling Regarding Comments on Topics Discussed at the August 22, 2025, Workshop (USTelecom Opening Comments), filed Nov. 21, 2025, at pp. 2-3.

¹⁵ Response of Frontier et al. to ALJ’s October 1, 2025 Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop (Frontier Opening Comments), filed Nov. 21, 2025, at p. 2.

¹⁶ Response of Consolidated Communications of California Company (Consolidated Opening Comments), LLC to ALJ’s October 1, 2025 Ruling Regarding Comments on Topics Discussed at August, 22, 2025 Workshop, filed Nov. 21, 2025, at pp. 2-3.

of the relationship between COLR withdrawal and the Section 214 process are accurate. As discussed in our opening comments, the COLR obligation is a state matter.¹⁷ The COLR obligation is an obligation to serve, *regardless of the technology* used to provide the service.¹⁸ The FCC’s Section 214 process addresses a request to discontinue specific interstate services and the retirement of legacy copper network facilities used to provide both intrastate and interstate services. While the processes are separate, both the California COLR requirements and the FCC Section 214 process involve the consideration of whether alternative services are available to customers. As discussed in detail in the subsection above, the FCC processes are significantly flawed and do not come close to adequate scrutiny of the availability of alternative services and whether the claimed alternative service is adequate for Californians. Regardless of whether a COLR files a Section 214 application, the Commission should enforce its own COLR requirements, which should continue to involve a robust fact-finding process and public input.

III. ACCESSIBILITY

A. Accessibility issues are relevant to the COLR rulemaking.

Multiple providers challenge the relevance of accessibility issues to the question of COLR withdrawal. Consolidated asserts that “access to specific dialing codes and support for specific types of customer equipment” are “generic regulatory issues unrelated to the specific question of whether there should be a COLR in a market that is robustly competitive.”¹⁹ Frontier argues that “C[alifornia] R[elay] S[ervice (CRS)] access should not be an indirect or independent

¹⁷ Joint Commenters Opening Comments at pp. 5-6.

¹⁸ See, e.g., D. 24-06-024, issued in A.23-03-003 on June 25, 2024, at p. 23. (“Finally, it should be noted that the Commission defines a COLR as a local exchange carrier, the COLR Rules do not distinguish between the voice services offered (VoIP vs. POTS).”) See also D.12-12-038, issued in R.09-06-019 on Dec. 24, 2012, at pp. 9-10 (explaining that a COLR wishing to offer basic service using multiple technologies may propose to do so by filing a Tier 2 advice letter).

¹⁹ Response of Consolidated Communications of California Company, LLC to ALJ’s October 1, 2025 Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop (Consolidated Opening Comments), filed Nov. 21, 2025, at p. 1.

basis for retaining COLR obligations.”²⁰

First, Consolidated’s comments reflect an overly narrow interpretation of the scope of this rulemaking. Per the scoping memo, two of the scoped issues in this proceeding are “[w]hat communications needs or activities still require COLR service” and whether or how the Commission should revise the elements of basic service, including whether those elements are technology neutral.²¹ Access to CRS is currently an element of basic service. As such, the question of whether other types of networks and technologies can provide CRS access and support equipment often used with CRS services is squarely within the scope of the proceeding.

Second, Consolidated’s and Frontier’s comments indicate a disturbing disregard for the accessibility of basic voice service—the defined *minimum* set of features and capabilities for voice service in California. There is a reason that accessibility advocates have developed the saying that accessibility should be “baked in” and not “bolted on.” Technologies, policies, and networks are the most accessible when accessibility is a consideration in their design from the beginning. Leaving accessibility as an afterthought leads to ad hoc, piecemeal solutions that tend to shift the responsibility of making services accessible to end users with disabilities. As discussed in TURN and CforAT’s opening comments, a technology transition is not an upgrade if what remains is *less* accessible than the networks and technologies phased out—this includes COLRs’ obligations to provide access to CRS as a part of basic service. Furthermore, as discussed in further detail in the “Miscellaneous” section, below, Frontier appears more interested in gaining the ability to deny service to areas that “do[] not make economic or operational sense to serv[e]” than the ability of its customers to access CRS.

Therefore, the Commission should ignore these challenges to the relevance of

²⁰ Frontier Opening Comments at p. 4.

²¹ Assigned Commissioner’s Scoping Memo and Ruling, issued Feb. 4, 2025, at p. 5.

accessibility issues in this proceeding and should continue to recognize accessibility in the elements of basic service and COLRs' service obligations.

B. AT&T ignores limitations of Real Time Text.

In its opening comments, AT&T states that “R[eal] T[ime] T[ext (RTT)] essentially replaces the [teletypewriter (TTY)].”²² Verizon makes a blanket recommendation that “customers transition from TTY to RTT.”²³ These assertions over-simplify reality. As discussed in TURN and CforAT’s opening comments, RTT also has limitations, the major one being that RTT only functions over IP-based networks.²⁴ In practice, RTT is available to far more wireless users than wireline users.

To paint a fuller picture of the challenges of making RTT available over wireline networks, The FCC Disability Advisory Committee discussed them in February of this year:

“it is not possible for analog telephone terminals and copper wire transport to be upgraded to support RTT. More significantly, many providers’ networks still contain substantial amounts of analog legacy infrastructure along with IP infrastructure. And, even if individual providers have upgraded their own networks to IP (as a growing number have), their customers’ home wiring and equipment and the interconnection points between providers may still be non-IP. As a result, transitioning wireline networks to IP is a long and ongoing process that requires replacing legacy network infrastructure and finding solutions for non-IP interconnection points . . . [M]ost voice connections into the customer premises are on analog copper phone lines even when the customer’s broadband service network is all IP. Thus, a telephone-centric approach must overcome the ‘last foot’ copper connection to the existing POTS terminals (residential and small business) or PBX terminals (medium and large businesses). These terminals (e.g., phones) cannot support RTT so another device or client over a fully IP network must be used.”²⁵

²² AT&T Opening Comments at p. 10.

²³ Verizon Opening Comments at p. 9.

²⁴ FCC, Real-Time Text: FCC, Recommendation of the FCC Disability Advisory Committee on the Report Prepared by the Real-Time Text Deployment in Wireline Networks Working Group (RTT DAC Recommendation & Report) (Feb. 24, 2025), retrieved from <https://www.fcc.gov/file/22907/download>, at pp. 5, 7.

²⁵ RTT DAC Recommendation & Report at p. 4.

In other words, just as other building and home owners would have to replace copper-dependent systems, equipment, and building wiring, so too would building and homeowners who want to modernize their properties to support wireline RTT. Otherwise, potential RTT users need to purchase additional services and devices to support over-the-top RTT—which may not be economically feasible—or they must work with the limitations of wireless service to use wireless RTT.²⁶ While RTT is a solution for some, it is not a total replacement for a TTY for all TTY users for a multitude of reasons.

C. AT&T’s analysis of California Connect equipment oversimplifies compatibility with VoIP and mobile wireless.

As part of its opening comments, AT&T submits an attachment detailing whether each piece of equipment that California Connect currently offers is compatible with wireless and VoIP networks. In the body of its opening comments, AT&T states that there is only one case where “both IP-enabled fiber and mobile wireless networks are incompatible with legacy TDM equipment provided through California Connect.”²⁷ However, as AT&T’s Attachment A reveals, the reality is more complicated.

Of the 63 pieces of California Connect equipment that AT&T analyzed, at least 36 need an “additional device” to be compatible (typically an adapter or other equipment, although some

²⁶ Joint Commenters Opening comments at p. 7.

²⁷ AT&T Opening Comments at p. 11.

require more complex technical workarounds²⁸). At least 13 are “model dependent”—as in only some models of that piece of equipment are compatible with VoIP or wireless (though AT&T does not always specify which models are compatible with either²⁹). Furthermore, it remains unclear if any service provider that submitted opening comments, including AT&T, has actually tested TTYs or other California Connect equipment with VoIP or wireless networks.³⁰

While it is encouraging that solutions already exist for making some California Connect equipment compatible with other networks, many of these solutions require the end user to obtain additional equipment or adapters, which California Connect does not currently appear to offer. The Commission should not consider California Connect equipment compatible with VoIP or wireless networks unless or until California Connect or a withdrawing or upgrading COLR offers the necessary equipment, adapters, and technical support to make compatibility

²⁸ See, e.g., AT&T Opening Comments, Attachment A, at pp. 1 (“The Bellman & Symfon Flash Receiver is not directly compatible with Voice over Internet Protocol (VoIP) products, but it can be used with a separate Bellman & Symfon Telephone/Multipurpose Transmitter. Some Bellman & Symfon receivers are labeled ‘VP Compatible,’ which means they can connect directly to a video phone (VP) with a built-in phone jack. Since the Flash Receiver is not VP compatible, using the separate telephone/multipurpose transmitter is the necessary method of connecting it to a VoIP device.”), 13 (“An Ultratec Uniphone, a traditional TTY, cannot directly connect to a modern wireless internet (Wi-Fi) network. It is an analog device that requires a standard copper telephone line (RJ-11) to function. However, there are ways to use a TTY With a wireless phone service. For a modern wireless setup, you would use a TTY-compatible phone with the Uniphone, not connect the TTY directly to the Wi-Fi. To use it with a wireless service, you must connect it to a TTY-compatible cellular phone with the proper connecting cable. Not all cellular phones are TTY-compatible. The phone must support TTY mode and typically has a 2.5 mm audio jack for a TTY cable. A specialized TTY-compatible connecting cable is required to connect the Uniphone’s audio port to the wireless phone’s audio jack. These cables are available from TTY distributors. Before making a call, you must activate TTY mode in your phone’s settings.”).

²⁹ See, e.g., the entry for the Clarity Cordless Amplified Phone: “Many Clarity cordless amplified phones are compatible with Voice over Internet Protocol (VoIP) products. The phone’s compatibility with VoIP typically depends on the model and the method you use to connect to your VoIP service.” AT&T Opening Comments at Attachment A, p. 3.

³⁰ See, e.g., Cox Opening Comments at p. 4 (“As to TTY devices themselves, Cox does not offer them and *understands* . . . such devices are *generally* compatible with the voice service Cox offers.” (emphasis added)); Charter Opening Comments at p. 3 (“Charter *believes* its fixed VoIP network can interface with all the equipment and services identified on the California Connect website as of October 16, 2025, which require a voice connection.” (emphasis added)).

possible without additional costs to California Connect participants.³¹ Until such changes happen, the Commission should reject AT&T's assertion that "there is no reason to retain the COLR obligation in order to support California Connect."³²

In contrast to AT&T's unverified claims, other providers are less confident on compatibility of California Connect equipment with their networks. For example, Verizon discusses how TTYs predate IP-based networks and that using a TTY with a VoIP network "can result in performance and reliability issues."³³ Consolidated states that it is unclear if there are "compatibility limitations" with its network and certain types of CRS users or equipment.³⁴ The Commission should approach the question of California Connect equipment's compatibility with VoIP and wireless networks with the nuance, attention to detail, and actual testing it requires.

IV. ANCILLARY SERVICES

A. **Specific technical and legal requirements are necessary for both network upgrades and COLR withdrawal.**

1. **The experiences of the alarm industry and emergency service providers contradict AT&T's claims about ancillary services' compatibility with other networks.**

AT&T argues no additional legal or technical requirements are needed for copper retirement "[b]ecause wired and wireless IP-based services generally can be adapted to support legacy ancillary equipment."³⁵ AT&T claims that new networks typically can work with old equipment, and that "[l]egacy equipment used for ancillary services generally works with modern technologies."³⁶ AT&T then states "IP-based networks *almost always* support ancillary

³¹ See Joint Commenters Opening Comments at pp. 16-17 (explaining that people with disabilities are disproportionately low-income and disproportionately excluded from the formal economy).

³² AT&T Opening Comments at p. 11.

³³ Verizon Opening Comments at p. 9.

³⁴ Consolidated Opening Comments at pp. 14-15.

³⁵ AT&T Opening Comments at p. 13.

³⁶ AT&T Opening Comments at p. 15.

services and legacy equipment.”³⁷ As with questions of CRS and California Connect compatibility with other types of networks, these are very general statements that the Commission should not accept at face value.

To support the argument that wired and wireless IP-based services “can generally be adapted to support legacy ancillary equipment,” AT&T points to statements made at the August 22, 2025, workshop by representatives from the California Highway Patrol (CHP), Caltrans, and California Alarm Association (CAA), noting that in “very urban” areas the CHP relies on cellular service that is very reliable, Caltrans has used “cellular deployments with a POTS backup,” and CAA members use POTS “where cellular is not an option.”³⁸ However, AT&T neglects to mention that the representative of the CAA also stated that in the event of a power outage, IP communication will fail.³⁹ The same is true for cellular networks. While an alarm system operator can install backup power at the premises, if the wireless provider has not deployed sufficient backup power, the network will fail in a prolonged power outage. As TURN and CforAT discussed in opening comments, the CPUC’s network resiliency and backup power requirements only apply in high and moderate fire threat areas, and if these requirements are not enhanced and enforced, there will not always be sufficient backup power to ensure that cellular networks function during power outages.⁴⁰ Moreover, as discussed below, at least some cellular connections also involve the use of IP networks. As discussed further below, the transition to IP networks has not been smooth and has involved major technical problems due to the failure of large carriers to properly test the compatibility and functionality of IP-based “alternative solutions.”

³⁷ AT&T Opening Comments at p. 18 (emphasis added).

³⁸ AT&T Opening Comments at p. 18.

³⁹ Sarah Wilson, August 22, 2025 Workshop Recording at 2:43:37.

⁴⁰ Joint Commenters Opening Comments at pp. 18-19.

AT&T further argues that it offers various services that make legacy equipment compatible with wireless and wireline IP equipment. AT&T describes the ability of its Hosted Voice Service (“a cloud-based, VoIP telecommunications service that provides a suite of telecommunications tools”) to convert analog traffic from legacy ancillary equipment into IP signals for transport over the internet. AT&T further describes AT&T Phone for Business – Advanced that “comes with an enterprise-grade appliance that connects with analog telephones and legacy ancillary devices” and is “designed to enable legacy ancillary equipment – such as fire and security alarms, auto-dial call boxes, utility automatic meters, and point-of-sale terminals—to continue to operate after replacement of a TDM network connection with an IP-based broadband network connection.”⁴¹ Finally, AT&T describes its Business Voice service as a “‘simple, ‘one-box solution’ consisting of a device that connects with analog technology infrastructure . . . , converts the analog signal to a digital one, and then delivers the converted signal over wired or wireless internet connections.”⁴²

However, presentations at the August 22, 2025, workshop demonstrate that the use of IP networks with ancillary services is not as straightforward as AT&T claims. CAA representative Sarah Wilson described problems with IP communications and central station alarm systems. As discussed in our opening comments, central station alarm systems are alarm systems that are connected to a central monitoring station. When the alarm system is triggered, communications facilities provide the central station with a signal that allows the station to immediately notify emergency services, including fire and police.⁴³ Sarah Wilson described the problems associated with IP networks as two-fold: signals being compromised due to carriers compressing data for

⁴¹ AT&T Opening Comments at p. 15.

⁴² AT&T Opening Comments at pp. 15-16.

⁴³ Joint Commenters Opening Comments at pp. 22-23.

faster transmission on IP networks, and IP systems that do not meet state and federal requirements for alarm systems.⁴⁴

As Sarah Wilson described, the demarcation between the alarm panel itself and the telecom carrier's IP network "has to stay POTS in order for the panel to do what it is designed to do."⁴⁵ But because telecom carriers are trying to transmit data "faster going through different IP networks," the mix of technologies results in compromised signals. Ms. Wilson stated, "what they have been seeing for a while now, a decade or more, is compromised signals. So, the signals that are going into the central stations on these POTS lines are getting compromised by the phone carriers because they are compressing the data."⁴⁶

Ms. Wilson expressed serious concerns about the options offered by carriers such as AT&T, due to the fact that the IP and VoIP systems often do not comply with state and federal fire alarm and signaling requirements:

You know, there's been sort of AT&T and other vendors saying that they can do POTS replacement, POTS in a box type things, and those are the solution. But ultimately what those are, you're looking at, those are IP, those are VoIP. And the problem is, they're not California State Fire Marshall approved. They also often fail to meet NFPA 72 requirements. [National Fire Protection Act – NFPA 72 National Fire Alarm and Signaling Code] So when we're talking about what requirements are necessary, you know our industry is heavily governed by the state of California and the state fire marshal. And we cannot do any of these things, these upgrades, these communication changes, without getting them approved. And, if this is, if they're going to withdraw out, we're going to have fire alarm systems that are going to not communicate, they're going to send in trouble communications. Sometimes, it's actually seizing the phone lines at the central station so other communication cannot come through. And then the failures during power outages or network outages. And so ultimately all of this compromises the life safety in which these systems are designed to do and protect.⁴⁷

AT&T agrees with Ms. Wilson that the Commission should coordinate with the Division

⁴⁴ Sarah Wilson, August 22 Workshop Recording at 3:05:12-3:07:24.

⁴⁵ Sarah Wilson, August 22 Workshop Recording at 3:05:51.

⁴⁶ Sarah Wilson, August 22 Workshop Recording at 3:05:12.

⁴⁷ Sarah Wilson, August 22 Workshop Recording at 3:06:05.

of State Architect to provide information for the DSA to approve “any necessary modifications when TDM connections to school fire alarms are replaced with wireless or wired IP connections,” and AT&T would like to participate in such coordination.⁴⁸ However, AT&T believes that this informal arrangement would be sufficient and that there would be no need for the Commission to mandate the DSA or any other agency to approve COLR withdrawals or basic service discontinuances.⁴⁹ TURN disagrees.

Alarm systems are vitally important for public safety. While carriers such as AT&T claim that they have viable alternative systems, the experience of the alarm industry demonstrates that it is important to verify that these alternative options work in practice. This position is supported by statements from the Alarm Industry Communications Committee in Reply Comments recently submitted to the FCC, responding to USTelecom:

The transition away from facilities-based telephone connections remains incomplete, particularly for existing installed systems that represent decades of infrastructure investment by both property owners and alarm companies. Various replacement technologies are available in the marketplace, but these alternatives are not uniform in reliability or compatibility with existing alarm systems. Some replacement services adequately replicate the functionality of traditional connections, while others introduce latency, compatibility issues, or reliability concerns that can affect alarm signaling. *The technical specifications of alarm communicators – which were designed and installed to work with specific telecommunications infrastructure--do not automatically transfer to alternative technologies without verification and, in many cases, equipment modification or replacement.*⁵⁰

The Commission should not take unverified industry representations about the compatibility of new networks and existing equipment at face value. The disconnect between AT&T and USTelecom’s rosy portrayal of the ease of transitioning from the legacy network to

⁴⁸ AT&T Opening Comments at p. 19.

⁴⁹ AT&T Opening Comments at pp. 19-20.

⁵⁰ WC Docket No. 25-208, WC Docket No. 25-209, Reply Comments of the Alarm Industry Communications Committee (AICC FCC Reply Comments), filed Nov. 18, 2025, at p. 5 (emphasis added), available at <https://www.fcc.gov/ecfs/document/111978258077/1>.

“POTS in a Box” and other purported solutions, contrasted with the real-world experiences described by representatives of the alarm industry, is deeply concerning.

The transition from the legacy network to IP-based communications is a rocky country road, not a paved highway. While AT&T tries to paint itself as a proponent of “good corporate citizenship,” and proclaims that “ensuring the continuity of service is a business imperative,”⁵¹ the experiences of Intrado Life and Safety (“Intrado”), a national provider of 911 services and leading public safety advocate, tell a much different, and more sinister, story. As a provider of 911 systems, Intrado is well-versed in the transition from the legacy TDM network to Next Generation 911 (NG911) architectures, which rely on IP-based infrastructure. 911 systems rely extensively on legacy TDM circuits, and those circuits remain essential for the provision of 911 service.⁵² In comments filed in the FCC’s NPRM on September 29, Intrado described serious problems with the transition to IP-based infrastructure. Intrado stated that the ILECs

did not properly evaluate the impact to 911 when they began their efforts to decommission TDM after BDS [Business Data Services] deregulation; they erroneously assumed another type of circuit or other transmission means could transport 911 voice the same way as channelized TDM. Instead, the ILEC wholesale business segments did not consult with the public safety community (or even their own internal public safety business segments) and erroneously assumed that 911 could simply migrate to IP without a clear understanding of what is necessary from a signaling perspective for legacy 911 traffic. This mismatch between the ILEC’s desire to transition to IP quickly and indiscriminately and the specialized needs of the 911 network during the NG911 transition is what drives the current problem and puts the 911 network at risk from premature decommissioning.⁵³

Moreover, Intrado stated that the ILECs offer no viable alternative services and “are unwilling to work through technical and architectural design limitations and are unwilling to discuss the

⁵¹ AT&T Opening Comments at p. 14.

⁵² Comments of Intrado Life & Safety, Inc (Intrado FCC Comments), in FCC Dockets WC 25-208 and WC 25-209, filed Sept. 29, 2025, available at <https://www.fcc.gov/ecfs/document/10929796613250/1>, at pp. 2, 4-6.

⁵³ Intrado FCC Comments at p. 3.

impact on 911.”⁵⁴ Intrado further stated that the ILEC’s poorly enacted technology transition practices “have created a chaotic and relentless whack-a-mole situation for 911 vendors and PSAPs, putting 911 availability at risk and passing unsustainable costs on an underfunded 911 network.”⁵⁵ TURN includes a full copy of Intrado’s comments as Attachment A to these comments.

Intrado’s experiences are instructive for several reasons. First, they demonstrate that the substitution of IP-based services is not straightforward or seamless, regardless of what AT&T and USTelecom claim. Second, the problems faced by Intrado illustrate why the FCC’s proposals to “streamline” Section 214 processes by further reducing public notice and the evaluation of purported alternative services are unwise, will not result in reliable networks, and will not protect California consumers. Third, the “need for speed” to accede to the ILEC’s tech transitions agenda poses a threat to public safety. Yes, new networks are coming, but alternative infrastructure needs to reliably provide the services and functions that people, agencies, and businesses need. Fourth, if major carriers, failed to properly evaluate alternative systems for 911 service, and even refused to consult with a major 911 service provider about network architecture, even after consultation request occurred, those failures raise major concerns about their approach to alternative services offered to the residential and small business customers who would be affected by COLR withdrawal or technology transitions. Finally, Intrado’s experiences point to the importance of extending service quality requirements to VoIP services.

⁵⁴ Intrado FCC Comments at p. 3.

⁵⁵ Intrado FCC Comments at p. 3.

2. Recent outages underscore the need for ancillary service providers and customers to have notice and protections.

There are many ancillary services that rely on telecommunications networks, most users of these services will be unaware of this proceeding, and they will not be in a position to provide information or feedback to the Commission unless the revised COLR rules provide for sufficient public notice. There is anecdotal evidence that the alternative services suggested by AT&T are not reliable. Despite the current lack of data on service quality issues with IP-based services, TURN can identify two examples of customer problems with AT&T's IP-based alternative services. The first is a December 2, 2025, report from CBS 8 San Diego about a serious disruption of AT&T business service serving businesses at the Midway Towne Center in San Diego.⁵⁶ "The outage occurred four days before Thanksgiving, eliminating phone orders, internet orders, and credit card payment processing for affected businesses."⁵⁷ When one of the businesses contacted AT&T to report the problem, "AT&T representatives just told them they needed to spend more money to upgrade their service."⁵⁸ Service was restored over one week later.⁵⁹

The second is a similar situation that recently occurred in San Francisco. Businesses in the Sunset District experienced significant AT&T communications outages affecting phone,

⁵⁶ Steve Price, AT&T service outage devastates Midway District businesses during holiday season, CBS 8 San Diego (Dec. 2, 2025), available at <https://www.cbs8.com/article/news/local/att-service-outage-devastates-midway-district-businesses-holiday/509-6817b754-e387-42f2-816a-1499e7f24c55>;

CBS 8 San Diego, AT&T service outage devastates Midway District Businesses during holiday season (Dec. 3, 2025), available at https://www.youtube.com/watch?app=desktop&v=eCJ0aP_TW14.

⁵⁷ Steve Price, AT&T service outage devastates Midway District businesses during holiday season.

⁵⁸ CBS 8 San Diego, AT&T service outage devastates Midway District Businesses during holiday season.

⁵⁹ Steve Price, AT&T service outage devastates Midway District businesses during holiday season.

internet and credit and debit card transactions.⁶⁰ Because the outage simultaneously affected multiple voice and data services, TURN believes that the affected services may include one of the IP-based “alternative” services offered by AT&T.

AT&T’s desire to shed its COLR obligation should not supersede the importance of public safety, reliable alarm systems, or reliable provision of other ancillary services, for which similar concerns apply. As AT&T noted when describing its available alternative services, they are intended to work with many “legacy ancillary devices” such as point-of-sale terminals, utility automatic meters, fax machines, public safety phones, elevator phones and utility lines.⁶¹ As noted in the above examples, it is not unreasonable to assume that the problems plaguing alarm signaling services could also impact other ancillary services. A withdrawing or upgrading COLR should provide adequate notice and detailed information about proposed network changes to all vendors and customers who provide and utilize ancillary services well in advance of such changes. AICC is familiar with matters before the FCC related to tech transitions and has participated in many FCC proceedings. The same is not true for all providers and users of ancillary services, many of whom are likely not fully aware of the impacts of proposed changes, both in terms of functionality and the expense of converting a system. Moreover, these concerns do not solely apply to COLR withdrawal because, as discussed earlier, under CPUC rules, a COLR can offer basic service over alternative technologies, in which case similar issues would arise if a COLR decided to upgrade its network from POTS to another technology.

To ensure public safety, alarm services vendors, alarm service customers, and 911 operators, including those served by central station alarm systems, need to be fully apprised

⁶⁰ Mario Cortez, SF neighborhood’s restaurants frustrated as AT&T outage cuts into orders, sales, San Francisco Chronicle (Nov. 23, 2025), available at <https://www.sfchronicle.com/food/restaurants/article/att-outage-sunset-restaurants-21202522.php>.

⁶¹ AT&T Opening Comments at p. 15-16.

about the technical requirements of the transition. Alarm service customers may incur significant expense in reconfiguring equipment, submitting plans, and obtaining permits.⁶² The Commission should consult with the DSA and Authorities Having Jurisdiction (AHJ) representatives to determine a notification process for COLR withdrawal and consequent upcoming network transitions that will allow sufficient time for the AHJs to verify that the proposed changes comply with state and federal requirements, and that the systems will function properly. TURN agrees with AT&T that carriers should be involved in this process, but the process should be driven by requirements to protect the public health and safety, not AT&T's business imperative.

In addition to being involved in developing a notification process, the DSA should be involved in establishing requirements and specifications for alternative communications services that are used to provide alarm systems to schools to ensure that those services meet federal and state requirements. As explained by Sarah Wilson, when there are communications changes to a fire alarm system, fire alarm vendors have to submit plans to the local AHJ, the local fire district, for review and approval.⁶³ When a COLR withdrawal is proposed, DSA should receive verification that the requirements have been met when a fire alarm system is modified to accommodate a communications network change. This concern is especially important for schools, which must meet strict requirements, but is also valid for government agencies, businesses, and residences that rely on alarm services.

B. Ancillary services are relevant to this proceeding.

USTelecom argues that while certain alarm systems continue to rely on legacy

⁶² See Sarah Wilson, August 22 Workshop Recording at 3:03:16.

⁶³ Sarah Wilson, August 22 Workshop Recording at 3:02:00.

technology, there are many modern options for home monitoring.⁶⁴ USTelecom claims that the issue of whether ancillary services are interoperable with next generation technologies has been considered extensively at the state and federal levels in establishing rules governing copper retirement and is therefore separate and distinct from California's COLR requirement.⁶⁵

USTelecom is wrong on both points.

As discussed in the prior section and in TURN and CforAT's opening comments, even though conversion from legacy TDM analog to IP is possible, 911 providers and the alarm industry in particular have continued to be plagued by problems caused by the carrier's practices with the use of IP networks and the fact that IP and VoIP networks often do not comply with state and federal fire alarm signaling requirements. In their recent Reply Comments to USTelecom in the FCC's latest tech transitions docket, the AICC thoroughly debunked the notion that the legacy network is no longer necessary or important for the provision of alarm services.⁶⁶ In that docket, USTelecom made similar arguments to those it is making here. In response, AICC stated:

USTelecom asserts that home security alarms today rely on wireless networks and built-in wireless antennas rather than analog phone lines to connect alarm systems to monitoring services, and that systems can use customer's home internet connections through ethernet or WiFi to communicate with monitoring services. This characterization misrepresents the current state of alarm monitoring technology and overlooks the continued predominance of facilities-based telecommunications services for life-safety applications.

A substantial number of professionally monitored alarm systems continue to rely on traditional telephone service connections for primary signaling paths. While wireless and internet protocol communicators exist as options, they typically function as backup or supplementary communications paths rather than primary connections. This is particularly true for fire alarm systems, which are governed by codes and standards that often require specific types of monitored connections. The transition away from facilities-based telephone connections remains

⁶⁴ USTelecom Opening Comments at p. 3.

⁶⁵ USTelecom Opening Comments at p. 2.

⁶⁶ AICC FCC Reply Comments at pp. 4-6.

incomplete, particularly for existing installed systems that represent decades of infrastructure investment by both property owners and alarm companies.⁶⁷

USTelecom’s claim about the compatibility of ancillary services with next generation technologies is similar to AT&T’s argument that ancillary services that connect over other types of legacy TDM lines that “have no relationship to the COLR’s status,” and that therefore the relationship between COLR withdrawal and impacts on ancillary services are beyond the scope of the proceeding.⁶⁸ While it is true that the COLR obligation applies to basic service for residential and business customers, it is also true that AT&T itself has linked the COLR obligation with the continued provisioning of legacy TDM service. AT&T’s top executive informed Wall Street investors that he intends to shut down the copper network, “turn out the lights” and “walk away” from continuing to provide fixed infrastructure that is used to serve customers in geographic areas with low utilization and low profitability.⁶⁹ In layman’s terms, it means discontinuing legacy TDM services, regardless of *what* that service is. It is highly unlikely that AT&T would discontinue its TDM service for just POTS customers but continue maintaining the legacy network for other services in areas that it deems unprofitable. AT&T has already started down that path by failing to repair its network, failing to repair lines serving customers, and refusing to provide legacy service to customers who request it.⁷⁰ If AT&T is permitted to withdraw as a COLR and insists that other alternative services are available, the decision to do so will also affect the service options available to all customers in the affected

⁶⁷ AICC FCC Reply Comments pp. 4-5 (internal citations omitted).

⁶⁸ AT&T Opening Comments at p. 13.

⁶⁹ Joint Commenters Opening Comments at p. 21, fn. 67.

⁷⁰ *See, e.g.*, Opening Comments of TURN and CforAT on the Administrative Law Judge’s Ruling Regarding Comments on Topics Discussed at the April Workshops, June 13, 2025, at pp. 9-12 (responding to the question: For all parties, should the Commission adopt any additional policies to address customer complaints about being improperly or inadvertently denied access to basic service?).

geographic area who rely on the legacy network, regardless of whether they purchase a single residential, or a single business line, or a copper line that would be phased out. TURN believes that the questions posed by the Commission regarding ancillary services are part of the Commission's effort to perform proper due diligence to fully understand the potential impacts of COLR withdrawal and related technology transition issues.

C. The Commission should be skeptical of AT&T's claims that it will leave no customer behind.

Throughout this proceeding, AT&T California has stated its commitment to not leave any customer behind in the transition to modern high-speed fixed and mobile broadband networks and services: "The staged nature of AT&T California's proposals for COLR modernization, based on the availability of an alternative voice service and with a process for customers who disagree about service availability, will ensure the continuity of communications services."⁷¹ AT&T argues that none of the problems with alternative services or technology transitions are inconsistent with AT&T's proposals because AT&T only wants COLR withdrawal in places where there are no alternatives. This claim is disingenuous. For example, in AT&T's application for large-scale COLR withdrawal, it claimed that the vast majority of its service territory is "well served," despite the fact that this territory includes areas where it is well known that cellular service is spotty or non-existent.

D. SBUA also raises other important ancillary services the Commission should consider.

In its opening comments, Small Business Utility Advocates (SBUA) list a number of ancillary services essential to small business operations, such as older point-of-sale systems,

⁷¹ AT&T Opening Comments at p. 14.

traditional paper faxes, and security systems like traditional entry control systems.⁷² TURN agrees with SBUA that the Commission should add these ancillary service to the list of those that may be affected by a COLR withdrawal or network upgrade. Upgrading such systems is of particular concerns to small businesses, who are likely to find the cost of making those upgrades more burdensome than larger businesses.

V. MISCELLANEOUS

A. The Commission should be skeptical of AT&T's claimed copper maintenance costs.

AT&T claims “in 2023, [it] found it spends more than a billion dollars per year in California on its TDM network and associated legacy services” and with its opening comments submitted “a spreadsheet containing data for 2023 that details the expenses attributed to the various cost categories necessary to maintain AT&T California’s TDM network and associated legacy services.”⁷³ The Commission should not accept this estimate from AT&T or rely upon it in any way without further validation, explanation, and documentation.

The Commission’s institutional knowledge and expertise includes the nature of the telecommunications network and related cost of service issues. The telecommunications network is a technology platform which supports many different customer services provided to different customer classes such as business, residence, government and large enterprises. Historically, the Commission in ratemaking proceedings has had to determine what proportion of a telecommunications network shared and common costs are to be allocated to which services and customer classes. Historically, the Commission has had a “view of the whole” and therefore had the ability to ensure that the sum of the allocated parts adds up to the whole shared and

⁷² Opening Comments of SBUA on ALJ’s Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop, filed Nov. 21, 2025, at pp. 4-5.

⁷³ AT&T Opening Comments at p. 26.

common cost amount to ensure total cost recovery for the telecommunications company. TURN does not contend AT&T is subject to traditional telecommunications ratemaking practices but offers this information as background to explain why AT&T's statement it "spends more than a billion dollars per year" should be viewed skeptically without documentation of *how* AT&T decided what costs should be allocated to legacy California copper/TDM operations.

The large size of telecommunications operators shared and common costs means costs of specific segment operations like copper/TDM will vary significantly depending on underlying assumptions regarding allocation of shared and common costs. Here, AT&T states it has "attributed" expenses "to the various cost categories necessary to maintain AT&T California's TDM network and associated legacy services."⁷⁴ The Commission has *no* visibility into AT&T's "attribution" assumptions and methods, how the cost categories are defined, or how direct costs are defined. AT&T acknowledges this fact when it states at the bottom of page 3 of Attachment B that **[BEGIN CONFIDENTIAL]** [REDACTED]

[REDACTED] **[END]**
CONFIDENTIAL]

The magnitude of this issue from a ratemaking perspective can be illustrated by the debate over the cost of basic local service prior to deregulation under the Telecommunications Act of 1996. AT&T and other ILECs would routinely advocate that the cost for basic local service included the full cost of the local copper loop, resulting in proposed local rates of \$30-35 per month. State utility commissions would typically make a different finding: that the total cost of the local copper loop should be a shared cost recovered from the multiple services that use the local loop, resulting in \$10-12 per month local rates. The difference between the ILEC cost

⁷⁴ AT&T Opening Comments at p. 26.

estimate for basic local service (\$30-35 per month) and the rate for basic local service determined by regulators (\$10-12 per month) illustrates the magnitude of the shared and common cost allocation issue.

B. Frontier admits it wants the ability to pick and choose which areas and customers to serve.

In its responses to the questions regarding the April 2022 Workshop held in this proceeding, Frontier discusses whether the COLR obligation places ILECs such as Frontier at a competitive disadvantage. Frontier says that competitive carriers “are able to pick where and which customers they want to service and which areas and consumers that it does not make economic or operational sense to service. There is no justification for continuing the asymmetric treatment of COLRs versus other competitive carriers”⁷⁵ In other words, Frontier asserts that COLRs, too, should be able to “pick where and which customers they want to service” and abandon the “areas and consumers that it does not make economic or operational sense to service.” Frontier, like AT&T, seeks the ability to “turn out the lights” and “walk away” from areas it deems unprofitable. The Commission should recognize these statements as what they are: antithetical to the goals of universal voice service.

As Frontier argues that it should be allowed to choose which customers it serves, TURN points out that Frontier has received funding, both from California and federal programs, to support infrastructure deployment. This funding includes pending applications to the Commission for California Advanced Services Fund (CASF) awards totaling over \$182 million

⁷⁵ Frontier Opening Comments at p. 16.

and a federal Broadband Equity, Access, and Deployment (BEAD) award of \$248 million.⁷⁶ In other words, Frontier continues to request subsidies to support Frontier’s business operations, while at the same time Frontier seeks carte blanche to abandon customers and target investment to more lucrative areas.

C. The Commission should reject providers’ requests for unfettered discretion on the scope of their COLR withdrawal applications. (Alexandra)

Frontier recommends that the Commission not “predetermine or limit the scope of COLR relief that a carrier can request in an application.”⁷⁷ Similarly, AT&T asserts that a COLR should be able to “apply to relinquish that obligation wherever and whenever the COLR satisfies those criteria.”⁷⁸ TURN disagrees.

AT&T’s application to withdraw as a COLR in a large part of its service territory (A.23-03-003) illustrates the enormous potential response when the application for a COLR withdrawal is large in scope. AT&T’s application generated significant engagement from potentially affected customers and relevant local governments. Many local governments throughout AT&T’s service territory publicly weighed in on AT&T’s application through ex parte letters or comments once they received notice of it.⁷⁹ The PPHs for that proceeding generally had robust attendance, particularly the virtual sessions,⁸⁰ and members of the public contributed thousands more

⁷⁶ CPUC, CASF Proposed Infrastructure Project Summaries (last updated Oct. 31, 2025), available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/california-advanced-services-fund/casf-infrastructure-project-summaries>; Jake Neenan, California Announces Grant Winners With BEAD Final Proposal (Dec. 3, 2025), available at <https://broadbandbreakfast.com/california-announces-grant-winners-with-bead-final-proposal/>.

⁷⁷ Frontier Opening Comments at p. 7.

⁷⁸ AT&T Opening Comments at pp. 24-25.

⁷⁹ TURN submitted an ex parte letter to the Commission compiling ex parte letters opposing AT&T’s application, which included 24 letters from local governments or associations representing local governments, all submitted between January 2024 and March 2024.

⁸⁰ See, e.g., May 5, 2025, Virtual PPH Transcript, ALJ Glegola 451:23-452:2 (“Before we continue, I do want to let folks know that currently there are 22 people waiting to speak. So I’m going to move the speaking limit to two minutes instead of three just so people aren’t on the line for – waiting too long.”).

comments to the proceeding's docket card. TURN commends the Commission for ensuring widespread public input. Because AT&T's application proposed withdrawing the COLR designation for virtually its entire service territory, it created a challenging logistical situation for the Commission and the public. In addition to the challenge of determining whether it is appropriate to grant a COLR's application for withdrawal across a large and diverse service territory, a large response to a large COLR withdrawal application places significant demands on the Commission to review that response and host enough public participation hearings (PPHs) to adequately gather public input. Accordingly, TURN recommends limiting the scope of COLR withdrawal applications as discussed in our opening comments.⁸¹

D. The Commission should not limit its data sources to existing broadband maps.

In its opening comments, AT&T again argued that “[g]overnment fixed and mobile broadband maps generally” as the “best-available evidence to demonstrate the presence of other voice providers.”⁸² Best available is not sufficient. As discussed above, the Commission cannot rely on these sources alone; forms of on-the-ground validation are necessary to confirm claimed coverage on government broadband maps. The Commission has recognized the need for validating mobile coverage data through its CalSPEED program, and another state has recently provided an example of statewide information-gathering effort distinct from coverage maps. This week, in Maine, the Maine Connect Authority announced a statewide planning process to assess cellular coverage across the state, with “[a] statewide survey [as] the cornerstone of the

⁸¹ Joint Commenters Opening Comments at pp. 31-33. Joint Commenters recommended that the scope of a COLR application should be based on the affected customer count, not the size of a withdrawal area. The application should, of course, provide information about the geographic territory affected by the proposed withdrawal of the COLR designation. However, a COLR withdrawal affecting more than two thousand (2,000) customers should be implemented incrementally, in part to ensure a smooth transfer of customers to other services.

⁸² AT&T Opening Comments at pp. 25-26.

planning process, capturing the lived experiences that raw data alone cannot reveal.”⁸³ Maine presents yet another example of the need to validate coverage of alternative services by seeking out qualitative and quantitative data on actual consumer experiences.

VI. RESPONSES TO ORDERS TO CARRIERS TO PROVIDE INFORMATION

A. Data submitted by carriers illustrates the continued necessity of basic Service elements that carriers seek to abandon as outdated.

In their opening comments, the TDS Companies repeat their proposal to eliminate elements of basic service that they consider to be outdated, including directory service and operator service, free blocking, and various billing provisions.⁸⁴ In its opening comments, Consolidated voices its support for this proposal.⁸⁵ TURN has previously opposed the elimination of requirements of directory service and operator service and continues to do so, as while the current elements could benefit from updated language, each remains necessary for all customers to have access to essential communications services.⁸⁶

In response to the Commission’s order for carriers to provide certain data, five carriers responded with public statistics on the number of calls requesting operator services and requests for directory service received each year for at least two years. (Frontier submitted its version of these statistics confidentially.⁸⁷) TURN presents the total number of calls to operator services reported by the five carriers in Figure 1 and the total number of calls directory services reported

⁸³ Maine Connectivity Authority, PRESS RELEASE: Maine Launches Study to Assess Gaps in Cell Coverage Statewide (Dec. 1, 2025), available at <https://www.maineconnectivity.org/news/press-release%3A-maine-launches-study-to-assess-gaps-in-cell-coverage-statewide>.

⁸⁴ TDS Companies Opening Comments at p. 2.

⁸⁵ Consolidated Opening Comments at p. 3. *See also* Opening Comments of Small LECs on Order Instituting Rulemaking Proceeding to Consider Changes to the Commission’s Carrier of Last Resort Rules, filed Sept. 30, 2024, at p. 9.

⁸⁶ Joint Commenters Amended Initial Proposal at pp. 35-36, Appendix B; Comments of TURN, The Communications Workers of America, District 9, and CforAT on Initial Party Proposals, filed Oct. 30, 2024, at p. 23.

⁸⁷ Frontier Opening Comments at pp. 10-11.

by the five carriers Figure 2, below. Cells with an orange background mean that the statistic is an estimate by the carrier.

Figure 1. Carriers' reported calls requesting operator services completed in 2023 and 2024.

Company	2023	2024
Happy Valley	257	332
Hornitos	11	12
Winterhaven	24	4
Consolidated	179	171
AT&T	173000	55000
TOTAL	173471	55519

Figure 2. Carriers' reported requests for directory service received in 2023 and 2024.

Company	2023	2024
Happy Valley	1006	851
Hornitos	53	50
Winterhaven	201	97
Consolidated	11248	6910
AT&T	62000	51000
TOTAL	74508	58908

These totals do not include statistics from Frontier (one of the largest COLRs in California) or the Small LECs. Even without that data, the total annual calls requesting operator service remained above 55,000 in both 2023 and 2024, and the total annual requests for directory service remained over 58,000 for both years. In 2024, consumers made an average of 151 calls a day requesting operator services with the five reporting carriers.⁸⁸ That same year, consumers made an average of nearly 161 requests for directory service per day with the five reporting carriers. These statistics indicate that operator and directory services remain important for

⁸⁸ 2024 was a leap year, so calls per day were calculated by dividing each annual total for 2024 by 366.

consumers to fully utilize their voice service, and the Commission should reject proposals to remove these elements from basic service.

VII. CONCLUSION

Joint Commenters appreciate the opportunity for further discussion on the important issues raised at the August 22, 2025, workshops and look forward to reviewing other parties' responses.

Dated: December 4, 2025

Respectfully submitted,

By: 

Alexandra Green

Alexandra Green,
Telecom. Regulatory Attorney
THE UTILITY REFORM NETWORK

Attachment A:
September, 29, 2025 Comments of Intrado Life & Safety, Inc in
FCC WC Dockets Nos. 25-208 & 25-209

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Reducing Barriers to Network Improvements and Service Changes	)	WC Docket No. 25-209
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208

COMMENTS OF INTRADO LIFE & SAFETY, INC.

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September 29, 2025

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Reducing Barriers to Network Improvements and Service Changes	)	WC Docket No. 25-209
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208

COMMENTS OF INTRADO LIFE & SAFETY, INC.

Intrado Life & Safety, Inc. (“Intrado”) respectfully submits these comments in response to the Federal Communication Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking (“*NPRM*”) in the above-captioned proceeding.¹

I. INTRODUCTION

Intrado is a nationwide provider of 911 services and a leading advocate for public safety, with extensive experience in the transition from legacy Time Division Multiplexing (“TDM”)-based networks to Next Generation 911 (“NG911”) architectures. We strongly support the Commission’s proposals to accelerate the retirement of outdated TDM facilities and transition to modern, IP-based infrastructure. IP connectivity is essential for realizing the promise of NG911 and offers substantial improvements in resiliency, redundancy, and functionality compared to legacy technologies. At the same time, the Commission must ensure that forbearance from the requirements of section 251(c)(5) and any revisions to the section 214(a) discontinuance process and related Commission rules do not undermine 911 availability and reliability by allowing

¹ *Reducing Barriers to Network Improvements and Service Changes*, WC Docket Nos. 25-208 & 25-209, Notice of Proposed Rulemaking, FCC 25-37 (2025).

incumbent local exchange carriers (“ILECs”) to disconnect 911 circuits without sufficient advance notice to affected parties and migration of legacy 911 traffic to an adequate substitute.

As a non-facilities-based 911 provider, Intrado relies on the handful of ILECs and their affiliates that control the supply of the nation’s remaining TDM private line circuits (*e.g.*, DS1s/DS3s) to support the delivery of 911 calls from Originating Service Providers (“OSPs”) to Public Safety Answering Points (“PSAPs”). Since the Commission’s deregulation of business data services,² the facilities-based, ILECs offering TDM circuit services have been aggressively turning down their TDM networks and/or constructively discontinuing these services through exponential price increases without adequate – or any – consideration of the impact on critical 911 services. We do not minimize the burden of maintaining an antiquated network with a declining customer base, but it is fact that 911 service in large portions of the United States has no alternative at this time and protecting not just the public safety but also lives must weigh heavily in the balance against the benefits of network modernization.

These ILECs are now further accelerating the discontinuance of their TDM networks, refusing to sell TDM circuits except on a month-to-month basis, denying extension requests even when an IP migration to an Emergency Services IP network (“ESInet”) is in process, and exponentially increasing the price month-over-month without regard for the extreme financial burden impact on PSAPs and State 911 Authorities. This has created an untenable situation, and the ILECs are not, as the Commission instructed in *2018 BDS Order*, collaborating with public

² *Business Data Services in an Internet Protocol Environment*, Report and Order, 32 FCC Rcd 3459, ¶¶ 102, 170 (2017) (“*2017 BDS Order*”) (rejecting concerns about the “potential spike in prices in areas deregulated as a result of the competitive market test” and entrusting “carriers to act in good faith to develop solutions to ensure rates are just and reasonable”); *see also Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Second Report and Order, FCC 18-74, 33 FCC Rcd 5660, ¶ 38 (2018) (“*2018 BDS Order*”) (declining to depart from expectation established in *BDS Order* that “carriers will ‘continue to collaborate with their [enterprise or government] customers, especially utilities and public safety and other government customers, to ensure that they are given sufficient time to accommodate the transition to [next-generation services] such that key functionalities are not lost during this period of change.’”).

safety customers to ensure that critical 911 functionality remains available as the country transitions to NG911.³

What is clear is that the ILECs did not properly evaluate the impact to 911 when they began their efforts to decommission TDM after BDS deregulation; they erroneously assumed another type of circuit or other transmission means could transport 911 voice the same way as channelized TDM. Instead, the ILEC wholesale business segments did not consult with the public safety community (or even their own internal public safety business segments) and erroneously assumed that 911 could simply migrate to IP without a clear understanding of what is necessary from a signaling perspective for legacy 911 traffic. This mismatch between the ILECs' desire to transition to IP quickly and indiscriminately and the specialized needs of the 911 network during the NG911 transition is what drives the current problem and puts the 911 network at risk from premature TDM decommissioning.

The ILECs offer no viable alternatives for TDM private line services, are unwilling to work through technical and architectural design limitations and are unwilling to discuss the impact on 911. They have been unwilling to extend – and, in many cases, even discuss – the time for decommissioning 911 circuits in communities that have no alternative, stabilizing circuit prices to avoid untenable increases for public safety agencies, or working with 911 providers such as Intrado to find solutions to allow traffic to be converted to IP. Even in cases where the 911 circuit user has an active plan to migrate the traffic to an IP-based connection or ESInet, ILECs are commonly refusing to extend decommission dates by several months to allow PSAP to complete migration to Session Initiated Protocol (“SIP”). Meanwhile, these same ILECs, when acting as an OSP, continue to prolong migration of their own legacy 911 wireline traffic to

³ See *id.*

SIP for interconnection to the NG911 network, putting at risk their ability to deliver 911 calls placed on their networks by their subscribers.⁴

The Commission clearly recognizes the reality that the transition to end-to-end NG911 is a complex, multi-year process that requires careful coordination among ILEC circuit providers, OSPs, 911 vendors, state 911 authorities, and PSAPs.⁵ While IP migration is the ultimate goal for NG911, TDM circuits will remain essential for 911 until all OSPs and PSAPs in a particular jurisdiction are fully IP-enabled, which in many jurisdictions will require several more years. exponential price increases, without first exploring and implementing adequate alternatives, will start to disrupt 911 call routing. It already threatens 911 network redundancy and reliability and has imposed substantial new costs on public safety agencies that need these circuits.

Accordingly, as discussed in more detail below, Intrado urges the Commission to implement guardrails to the *NPRM*'s proposals to eliminate or further streamline network change and discontinuance requirements.

II. THERE IS OFTEN NO VIABLE ALTERNATIVE TO TDM FOR LEGACY 911 TRAFFIC.

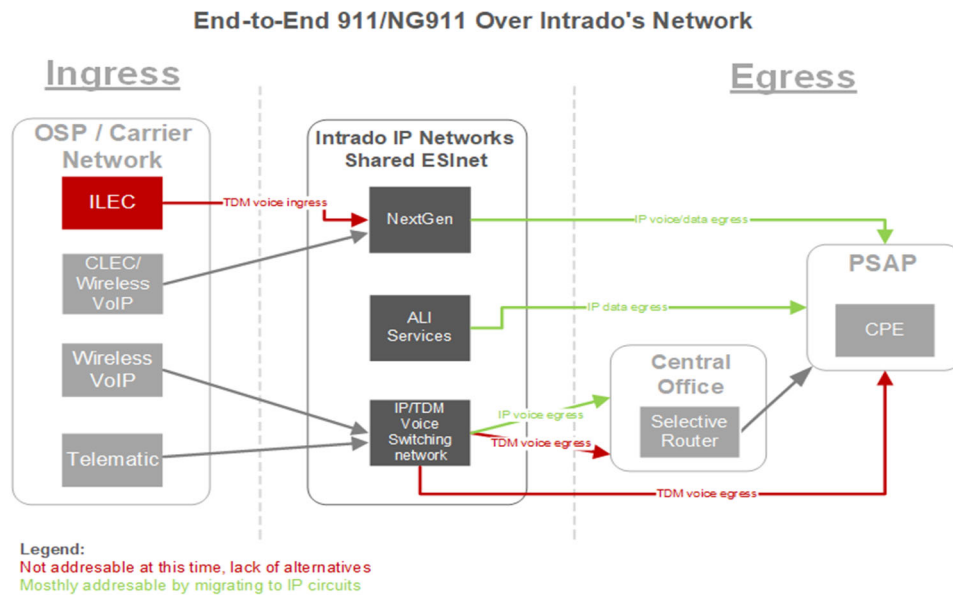
One of the key 911 questions raised in the *NPRM* is whether there are adequate alternatives to TDM for 911.⁶ The answer in many cases is no. TDM remains critical both for ingress traffic being delivered by OSPs to the 911 network and for egress traffic being delivered

⁴ Intrado has raised these issues in several other Commission proceedings. *See* Comments of Intrado Life & Safety, Inc., WC Docket No. 24-445 (Dec. 9, 2024); Comments of Intrado Life & Safety, Inc., WC Docket No. 25-158 (April 25, 2025).

⁵ *See generally* *Facilitating Implementation of Next Generation 911 Services (NG911); Location-Based Routing for Wireless 911 Calls*, PS Docket Nos. 21-479 and 18-64, Report and Order, FCC 24-78, 2024 WL 3507091 (Jul. 19, 2024) (“*NG911 Transition Order*”).

⁶ *See NPRM* ¶ 20.

by the 911 network to the selected PSAP as shown by the red lines in the greatly simplified diagram below:



This TDM requirement will continue until both the OSPs and PSAPs in a particular jurisdiction migrate to IP-based connectivity. In some cases, the OSPs are unwilling – possibly unable – to migrate to IP-based connectivity, particularly for wireline traffic. In other cases, the PSAP has not migrated to an ESInet. Sometimes, the PSAP can receive calls in IP, but the ILEC hosting the legacy Selective Router will not permit access to the serving Central Office for gateway co-location to convert TDM to IP for delivery to the PSAP. Consequently, the need for 911 TDM connectivity in many parts of the country will remain for many years, and any Commission framework for network modernization must explicitly protect the availability and affordability of 911 TDM circuits during this transitional period. As of today, most of the country’s 911 wireline traffic remains in TDM with slow migration progress by the ILECs and RLECs.

Last year, however, the Commission determined that State 911 Authorities set the time frame to transition to NG911.⁷ The Commission's July 2024 *NG911 Transition Order* provides that the migration to NG911 begins with a valid Phase 1 request for service from a State 911 Authority (which could be a single PSAP).⁸ OSPs subject to a valid request are then obligated to deliver 911 traffic in SIP to the designated NG911 delivery points on a specific timetable. A significant number of States and PSAPs in the United States have not yet invested in NG911 technology. While several additional State 911 Authorities are discussing their plans to solicit bids for statewide ESInets, it will take years to reach the point where all PSAPs and OSPs in a particular jurisdiction are IP-capable. Crucially, neither the Commission nor 911 vendors – such as Intrado – that serve state public safety agencies have the authority to force states or PSAPs to make the transition.

Forbearance with respect to the need to carefully coordinate the decommissioning of TDM circuits used in 911 will not accelerate the transition to NG911.⁹ It might however, hasten catastrophic 911 outages in areas of the country that have not transitioned if ILEC 911 circuit providers have free rein to take circuits down without deliberate, advance coordination with state public safety agencies and their vendors supported by Commission oversight.¹⁰

⁷ See generally *NG911 Transition Order*.

⁸ *NG911 Transition Order* ¶¶ 3-5.

⁹ *NPRM* ¶¶ 20, 126 (seeking comment on whether forbearance could help accelerate NG911 deployments and what Federal, state, or local requirements or factors exist that may conflict with the Commission's goals of accelerating the transition to next-generation networks).

¹⁰ Though not directly an issue for the Commission, we believe it is the case that, without federal funding, sunset of these legacy 911 networks remains a distant prospect. Even if funding became available today to ensure that all communities were in a position to initiate the transition to IP-based networks required for NG911, the transition of wireline legacy 911 traffic is years away.

III. THE ILECS' DECOMMISSIONING AND PRICING PRACTICES FOR 911 CIRCUITS DEMONSTRATE THAT THE COMMISSION SHOULD INTERVENE TO PROTECT PUBLIC SAFETY.

In the instant proceeding, the Commission risks undermining 911 reliability by providing ILECs unfettered ability to decommission legacy TDM 911 circuits, even as it emphasizes the criticality of 911 reliability and advances modernized reliability rules in a separate proceeding¹¹ – an approach fundamentally at odds with the Commission's long-standing commitment to 911 reliability. Despite the Commission's vision for the transition to modern, IP-based 911 infrastructure, the reality on the ground is far more complex and fraught with risk due to the TDM decommissioning and pricing practices of the ILECs.¹²

As a nationwide leader in 911 services, Intrado is witnessing firsthand alarming trends and practices that support the case for rule revisions to protect access to emergency services, including:

- **Inadequate Notification of Discontinuance and Price Increases:** 911 vendors and PSAPs often receive no or little advance warning when TDM circuits will be discontinued or subject to astronomical price increases by ILECs. The opaque communication process leaves them scrambling to ensure connectivity for emergency services, increasing the risk of service gaps – meaning 911 outages. In a recent exchange, one ILEC explained it has no regulatory obligation to send us notice of service changes and instead could simply post such changes on its website.
- **Exponential, Unsupported Price Increases:** The rapid phase-out of TDM circuits, coupled with extreme and unpredictable price hikes—including monthly costs soaring from \$350 to \$20,000 on dozens of circuits or even over \$50,000 on a few circuits—places severe financial pressure on 911 vendors and, therefore, States and PSAPs. These hikes are now coming without options for long-term contracts, which threaten PSAP operational budgets and continuity of service. In our role as a vendor representing public safety in this process, we have tried explaining to multiple ILECs that the charges will severely impact PSAP budgets, but the ILECs are unwilling to make exceptions. When

¹¹ *Facilitating Implementation of Next Generation 9-1-1 Services (NG911)*, PS Dkt. No. 21-479, Further Notice of Proposed Rulemaking, FCC 25-21, 40 FCC Rcd 2668 (2025).

¹² *NG911 Transition Order* ¶ 7; *NPRM* ¶ 20.

asked pricing or timing questions, the ILECs are unable to provide more details and cite their ability under Commission precedent to increase prices or decommission circuits at will and to move these services to month-to-month. Worse, they often just do not respond to requests to meet. After raising circuit prices by 5-10x over the last two years, one of Intrado's primary TDM circuit providers recently sent us notice of a future price increase in late 2025 of 3x across PRI circuits. This ILEC's notice includes no detail regarding the timing of the increase, the basis of the increase, or the specific circuits in scope.

- **Denial of Decommissioning Extensions and Unreasonable Extension Fees:** Requests for additional time to transition away from TDM circuits are starting to be denied, even when ongoing 911 traffic and PSAP operations are at risk. In two recent cases, an ILEC decommissioned our data center space in Florida that we rely on to deliver traffic to multiple PSAPs and decommissioned both of our TDM ingress circuits used to reach a PSAP in Oklahoma. We are working diligently and hastily to find a new home for this traffic. In other cases, short extension periods are only granted at exorbitant rates – sometimes 5-10x higher than the existing costs. For example, in a recent case, this same ILEC mentioned above required a one-time fee of \$30,000, in addition to already unreasonably high monthly recurring fee, simply to secure a three-month extension of a single TDM circuit to secure sufficient time to complete our ongoing installation of an IP alternative. The ILEC in this case provided only 48 hours to sign the extension paperwork and offered no explanation for the one-time fee while also rejecting our request to extend the 48-hour period by one day.
- **Finger-Pointing Among ILECs, Delays in SIP Migration, Lack of Communication:** ILECs frequently deflect responsibility for circuit decommissioning and price increases to one another, each blaming the other for network changes, offnet pricing disputes, last-mile issues or rate hikes. At the same time, they are collectively denying TDM connectivity to the 911 network while delaying their own 911 migration to SIP, further complicating the transition and prolonging reliance on legacy 911 systems. On top of this, certain ILECs are unwilling to engage in meaningful dialogue regarding their 911 decommissioning and SIP migration plans. In one case, several senior members of ILEC's legal and regulatory department flatly ignored Intrado's emails to engage on its discontinuance and pricing practices. In another, the ILEC that is decommissioning our data center space in Florida was at the same time ignoring our inquiries on how it planned to reroute an affiliate's traffic before an imminent October 2025 decom date – Intrado had to send seven follow-up requests to this ILEC just to get a simple "yes/no" confirmation of trunk discontinuance.
- **Lack of Pricing Transparency:** ILECs rarely provide clear details or justifications for price increases. When Intrado asks an ILEC for cost information, the ILEC typically

responds by directing us to convoluted tariff websites filled with dense documents, making it impossible to determine actual rates or plan effectively for future needs. In some cases, the ILEC will blame another ILEC and point us to that other ILEC's indecipherable tariff website for more convoluted information.

- **Contractual Power Imbalance:** ILECs leverage their network dominance to control BDS contracting through month-to-month terms that allow it to raise rates or discontinue circuits with no warning whenever it suits them and to deny long-term contracts with price stability. They also reject orders for new TDM connectivity even when IP is not a viable 911 alternative. Intrado's attempts to negotiate or plan for 911 traffic moves are often met with no response or refusal, leaving us and the downstream PSAPs with few options and heightened uncertainty. On the other hand, the ILECs have no concerns with maintaining TDM infrastructure to support their own 911 services and products, and their discontinuance stance often shifts when it might impact their own 911 network traffic.

These ILEC practices have created a chaotic and relentless whack-a-mole situation for 911 vendors and PSAPs, putting 911 availability at risk and passing unsustainable costs on an underfunded 911 network. Over the last year, Intrado has come dangerously close to losing 911 connectivity multiple times and it is only a matter of time until an ILEC causes a 911 outage by turning down our circuits or forcing a loss of redundancy due to excessive price increases.

The ILECs are acutely aware of the impact their decommissioning and pricing practices have had on 911 – they operate and maintain these 911 networks daily and manage millions of their own 911 records. These 911 circuits have Telecommunications Service Priority (TSP) tags with specific service identifiers in the ILEC's systems like E911 circuit or 911 trunk group and are often tied to tariffs, meaning the ILECs have a readily available way to recognize their critical importance. Further, the ILECs have been providing 911 services under contract to PSAPs for decades (and will continue to do so as NG911 vendors), so they have the technical expertise to understand what a 911 vendor or PSAP needs to maintain 911 traffic and whether a viable alternative exists. Still, this knowledge does not translate to responsible stewardship –

ILECs proceed undeterred despite the essential nature of these 911 connections or the downstream risks and burden to public safety from decommissioning and price increases.¹³

IV. THE COMMISSION SHOULD EXERCISE ITS BROAD AUTHORITY OVER PUBLIC SAFETY TO ENSURE 911 SERVICE AVAILABILITY AND RELIABILITY.

Given the threat to public safety from overzealous 911 TDM decommissioning and pricing practices, Intrado urges the Commission to reject forbearance proposals in the *NPRM* and more closely align its modernization goals with its statutory duty to “promot[e] safety of life and property through the use of wire and radio communications”¹⁴ by retaining explicit authority and oversight with respect to the discontinuance of TDM needed for 911 service.¹⁵ The Commission possesses clear and broad statutory authority in multiple provisions of the Act to preserve 911 availability and to stop unjust and unreasonable 911 TDM decommissioning practices.¹⁶ Ensuring uninterrupted access to 911 is not only consistent with the Commission’s statutory mandate, but also essential to safeguarding public safety during the transition to NG911.

Specifically, the Commission should revise its network change and discontinuance rules to require TDM circuit providers to: (1) require 911 TDM circuit providers to file with the Commission plans to decommission 911 circuits; (2) identify the 911 circuits that are the subject

¹³ Intrado understands that specific details of these patterns and interactions may be important in the Commission’s consideration of these issues, and we are evaluating our ability to provide further detail in this proceeding subject to contractual limitations.

¹⁴ 47 U.S.C. § 151.

¹⁵ *NPRM* ¶ 20.

¹⁶ 47 U.S.C. § 201(b) (empowering the Commission to ensure that carrier practices and charges are “just and reasonable”); *id.* § 214(a) & (c) (requiring consideration for the public interest and continuity of critical services such as 911 when seeking approval for service discontinuance, reduction or impairment and providing Commission authority to impose appropriate approval conditions); *id.* §§ 615a-1, 615b & 615c (granting the Commission authority to adopt rules and take enforcement action to ensure the reliability and accessibility of 911 and E911 services); *id.* § 151 (establishing the Commission’s fundamental duty to promote the safety of life and property); *id.* § 303(r) (empowering Commission with broad authority to adopt rules and regulations as may be necessary and proper); *id.* § 256 (authorizing the Commission to coordinate interconnectivity to ensure seamless communications).

of those filings; (3) remove these filings from streamlined processing and require a public comment period; (4) provide at least 180 days of advance notice to 911 circuit customers as well as the affected State 911 Authority and/or PSAP(s) of plans to decommission 911 circuits; and (5) exercise good faith to work with 911 circuit customers and the relevant State 911 Authorities and PSAP(s) to identify and implement alternative solutions where communities are not yet able to transition off TDM circuits for the delivery of 911 traffic. Further, we urge the Commission to retain and delegate to the Wireline Competition Bureau in consultation with the Public Safety and Homeland Security Bureau explicit authority to direct a carrier to:

- (1) Delay a network change or discontinuance if it would disrupt 911 traffic;
- (2) Maintain existing 911 TDM circuits until an IP alternative is available and viable and all legacy 911 traffic in that jurisdiction has migrated to the new IP connection;
- (3) Migrate their own OSP 911 traffic to SIP before being allowed to turn down legacy 911 circuits and infrastructure in any jurisdiction; and
- (4) Stop imposing unreasonable and unjust price increases on 911 TDM circuits when no IP alternative has been identified, when a PSAP is not ready to move to an ESInet, or a PSAP is in the middle of migrating to an ESInet.

ILECs have argued recently in section 214(a) discontinuance proceedings that the Commission should disregard the objections of 911 vendors like Intrado because these entities are carrier-customers rather than end users.¹⁷ First, Intrado is not a “wholesale” customer reselling TDM trunks – we are an enterprise end user of these services, which we integrate into a bespoke 911 solution that the nation’s 911 network universally relies upon to route 911 calls to the appropriate PSAP. Without these connections, Intrado’s legacy 911 service cannot deliver 911 traffic, and 911 calls will fail, putting lives and property at serious risk of harm or even death. Second, this ILEC argument ignores the obvious downstream impact that prematurely decommissioning critical 911 circuits would have on the retail and PSAP end users who rely on

¹⁷ See Reply Comments of Lumen Technologies, Inc., WC Docket No. 25-158 (May 2, 2025).

these connections for emergency assistance, but do not have the resources or knowledge to participate in overly complicated section 214(a) proceedings.¹⁸ Simply because a commenter to a section 214(a) application is a carrier-customer does not mean that the Commission must turn a blind eye to 911 impact when the harm will flow down to the consumer calling 911 and the PSAPs relying on these connections. Third, it is disingenuous for the ILECs in these section 214(a) proceedings to claim there are alternatives to TDM for 911 or that discontinuance will accelerate NG911 when these same ILECs – acting in their capacity as an OSP – have not moved their own 911 traffic to SIP. Until all OSP 911 traffic moves to SIP (including the ILEC’s wireline traffic) and all of the PSAPs move to ESInets, these ILEC TDM connections will remain essential for 911 services.

Certain recent, large-scale grandfathering applications by ILECs¹⁹ underscore the urgent need to ensure the remaining 911 TDM connections are not subject to premature decommissioning – given these ILECs will now be denying all orders for new 911 TDM circuits, it is critically important that the Commission protect existing 911 TDM circuits from unreasonable and unjust decommissioning and pricing practices. We strongly encourage the Commission to scrutinize section 214(a) discontinuance applications for 911 impact and to impose conditions to ensure continued 911 availability. Additionally, any changes to the Adequate Replacement Test or Alternative Options Test should include a specific certification that requires the applicant to certify 911 availability and reliability will not be impacted by the

¹⁸ The ILECs also commonly excuse these objections of 911 vendors to discontinuance by declaring their intent to honor their contracts with the carrier-customer. As discussed above, this promise is meaningless because the contracts for these 911 TDM circuits are all on month-to-month terms by ILEC design so that they can decommission the circuits or raise prices whenever they want without notice.

¹⁹ See Section 63.71 Application of Lumen Competitive Local Exchange Carrier and Interexchange Carrier Affiliates, WC Docket No. 25-158 (Apr. 3, 2025); Section 63.71 Application of AT&T Services, Inc., WC Docket No. 25-254 (Aug. 15, 2025).

discontinuance, an adequate 911 substitute will be implemented before the discontinuance, and the applicant has transitioned its own 911 traffic to SIP in the affected areas.²⁰

To the extent the Commission considers more extensive changes to section 214(a) such as eliminating the technology transitions distinction, forbearance from the 214 discontinuance requirements in specific instances, or elimination of certain grandfathering application requirements and the auto-grant timeline distinction between non-dominant and dominant carriers, we urge the Commission to proceed with caution and ensure that these actions do not inadvertently impact 911 services.²¹ We also strongly discourage the Commission from eliminating the carrier interconnections requirements in sections 63.500 and 63.501 of its rules.²² Doing so would effectively grant the ILECs unrestricted authority to disconnect 911 trunks without prior Commission approval or pre-planning with the public safety industry – an action that would almost certainly result in a major 911 outage during the ongoing transition to NG911. At a minimum, in all cases of potential 911 impact, affected parties (including the affected State and PSAP(s)) should receive sufficient advanced notice of discontinuance and the opportunity to transition to IP-based interconnection for 911 services.

Lastly, Intrado is on record supporting the creation of a multi-Bureau, multi-stakeholder NG911 implementation task force under the auspices of the Commission to oversee the transition to NG911.²³ Whatever form such a task force might take, the orderly and timely transition away

²⁰ *NPRM* ¶ 26 (proposing discontinuance applications be eligible for streamlined processing if the applicant certifies that at least one of five specified replacement services exists in the affected service area).

²¹ *NPRM* ¶¶ 36, 37, 77-78, 86.

²² *NPRM* ¶ 117.

²³ See Comments of Intrado Life & Safety, Inc., PS Docket Nos. 21-479, 13-75, filed Aug. 4, 2025; see also Comments of NENA: The 911 Ass'n, WC Docket Nos. 21-17, 17-97, 07-243, and 07-135; GN Docket No. 09-51; CC Docket No. 01-92, at 2 (filed May 14, 2025) (urging the Commission to ensure TDM connectivity to/from PSAPs is not impacted by grandfathering/discontinuance and advocating for establishing a task force to coordinate and ensure the tech transition from TDM to IP does not adversely impact 911 traffic).

from TDM circuits in the 911 network would be a central issue. The Commission has a long history of establishing and supporting such task forces to accomplish major policy and technology shifts, and Intrado renews its call to establish such a venue for the Commission's oversight of the transition to NG911.

V. CONCLUSION

For the reasons set forth above, Intrado respectfully urges the Commission to adopt safeguards to copper retirement that ensure the continued availability, reliability, and affordability of 911 services during the transition to NG911. The Commission must not allow the drive for modernization to undermine the core public safety mission of universal, reliable access to emergency communications. An unfettered "move fast and break things" regulatory approach is not compatible with protecting the public safety.

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