



**Telephone Network Transition Collaborative  
Feb. 23, 2016  
Meeting Minutes**

**Attendees:**

Public Utilities Commission of Ohio (PUCO) staff, Connect Ohio, Ohio 911 Program Office, Ohio Telecom Association (OTA), AARP Ohio, Windstream, CenturyLink, Southeastern Ohio Legal Services, Ohio Consumers Counsel (OCC), Ohio Cable Telecommunications Association (OCTA), Ohio Poverty Law Center, Buckeye Hills-HVRDD, Cincinnati Bell, AT&T, Lighttower, Level 3/Midwest Association of Competitive Communications (MACC) Providers, Verizon, National Regulatory Research Institute (NRRI), TDS, Pro Seniors, Hobbs Consulting and Time Warner Cable

**Topics discussed:**

- NG911 and interoperability<sup>i</sup> — Rob Jackson, Ohio 911 Administrator
- Competition and affordability:
  - David Bergmann, Office of the Ohio Consumers' Counsel<sup>ii</sup>
  - Charley Moses, Ohio Telecom Association<sup>iii</sup>
  - Jon Kelly, AT&T Ohio<sup>iv</sup>
  - Pamela Hollick, Level 3/MACC<sup>v</sup>

**Ohio 911 NG911 and interoperability presentation questions/comments:**

- PUCO staff asked is there a projected Next Generation 9-1-1 (NG9-1-1) date.
  - The Ohio 9-1-1 presenter stated, without legislation from the Federal Communications Commission (FCC), there is no date because Ohio is a home rule state, which means that no Public Safety Access Points (PSAPS) can be required to upgrade to NG9-1-1.
- PUCO staff asked the Ohio 911 presenter to explain 9-1-1 calls from a wireless phone.
  - The Ohio 9-1-1 presenter explained that the PSAP does not see a person's exact location from a wireless phone. This is why the Ohio 9-1-1 office released a public service announcement encouraging people know their location when calling 9-1-1 because while technology works "most of the time" it is still advancing and not foolproof. An individual knowing his or her location is vital to receiving emergency services quickly.
- PUCO staff asked what is seen at the PSAP when a 9-1-1 call is made from a rural home.
  - The Ohio 9-1-1 presenter stated that if the call is made from a traditional landline, the PSAP sees the person's exact location. From a wireless phone, the PSAP works off of GPS and cell towers and the exact location is not known but

the close vicinity is known. The rural area can be problematic with a 9-1-1 wireless call because the voice portion will come through the PSAP but it may not display the location.

- Nancy Serafino (CenturyLink) offered her help as a resource since she is a public safety engineer with over 20 years experience.

### **OCC affordability and competition for protection of Ohio consumers presentation questions/comments:**

- PUCO staff commented that the OCC claims there is no competition when the statute says that there is competition and asked how this, i.e. OCC's claim, could be true?
  - The OCC presenter stated that the existence of competitors is not an accurate picture of competition, especially economically, because many can't afford the service, which means there is no "reasonably-priced" alternative.
- PUCO staff asked why it should not be considered competition when consumers "cutting the cord" and voluntarily transition from traditional landlines to voice service over an IP network.
  - The OCC presenter stated that a customer moving to a bundle is not an indication of competition for basic local exchange service (BLES) in a stand-alone fashion.
- PUCO staff also commented that a customer switching to a bundle is in fact making a choice based on competition. PUCO staff further stated that the Commission will need to investigate how many people are still subscribing to standalone BLES and that the Commission must account for other functionality when determining if an alternative service is a reasonable and comparatively priced alternative voice service.
- A consumer advocate representative asked what the alternatives are in an area where both wireless service and broadband access are either unavailable or unreliable.
  - PUCO staff stated that an incumbent local exchange carrier (ILEC) cannot withdraw BLES unless a reasonable and comparatively priced alternative voice service is available in such an area. PUCO staff also stated that the Commission needs feedback from consumers to know where there is no alternative service, but must also consider that the landscape may change due to Connect America Fund (CAF) disbursements.
- A senior citizen group representative stated that education is a major factor to be considered with affordability and competition.
- A consumer advocate representative agreed with the senior group representative about education.

- A consumer advocate representative stated that consumers that want or need BLES have been hit with a double whammy: BLES prices are increasing while the quality of the service and consumer protections are decreasing.
- A senior citizen group representative stated that there is an assumption that competition exists, however, “reasonable and comparatively priced” is not the same as competition. Lastly, the senior citizen group representative stated that low-income consumers cannot afford high cost bundles.
- A consumer advocate representative asked how best to educate thousands of Ohioans. The consumer advocate representative also stated that the education effort must be effective and actively reaching consumers to give them enough information to make informed decisions.
  - PUCO staff stated the PUCO is discussing education internally and with the FCC. PUCO staff pointed out that the PUCO has an outreach program that can be utilized to educate consumers about the IP transition. Lastly, PUCO staff stated that we do not want to alarm consumers too soon and should not attempt to hold back progress in the state.
  - A consumer group representative stated that the withdrawal of BLES and the IP transition is different than energy choice. The consumer group representative also stated that the PUCO oversees the energy auctions that establish the standard service offer (SSO). The consumer group representative further stated that the default option for BLES may not exist as it currently exists. Lastly, the consumer group representative again stressed that consumer education efforts must be publicized to be effective.

**OTA competition and affordability presentation questions/comments:**

- There were no questions or comments on this presentation.

**AT&T competition and affordability presentation questions/comments:**

- A consumer group representative stated that consumers that rely on the emergency response system (ERS) may be unable to transition to wireless service because the wireless signal is too weak. The consumer group representative also stated that the ERS system enables consumers with medical conditions to remain in their own homes rather than being institutionalized. If ERS is not reliable these people may end up in an institution. The consumer group representative further stated that affordability is access and competition must fill the gap for things that people actually need. Lastly, the consumer group representative stated that his organization was told that broadband would be in the area within two years and it still has not arrived.
  - An industry representative stated that CAF is here and the carriers who accepted the CAF money have to roll out broadband in underserved and unserved areas

within six years and, as a consequence, the industry's focus is on the unserved areas.

- PUCO staff asked the Ohio 9-1-1 representative if the ERS topic has been addressed in any of the 9-1-1 committee discussions.
  - The Ohio 9-1-1 representative stated that it may be addressed in later sub-committee meetings.
- PUCO staff asked where fixed wireless is currently available.
  - The AT&T presenter stated that fixed wireless is available anywhere that AT&T offers traditional wireless service. The AT&T presenter also stated that fixed wireless takes fewer bars to get a signal, has a dial tone, and acts like BLES.
- A consumer advocate representative stated that, historically, landline phones are communal; however, wireless phones are not communal in that each person in the home has his or her own phone. The consumer advocate representative also stated that having to have multiple non-fixed wireless phones in the home raises the issue of whether non-fixed wireless is a reasonable and comparatively priced alternative.
- The Connect Ohio representative stated that the Lifeline broadband subsidy will only apply to a stand-alone broadband service.
- A consumer group representative asked if the Lifeline broadband credit will increase.
  - The Connect Ohio representative stated that the subsidy would remain at \$9.25.
- A consumer advocate representative stated that it is important that the wireless signal be available throughout the entire residence. The consumer advocate representative also stated that a two-year wireless contract with an inconsistent signal is a burden to consumers. Lastly, the consumer advocate representative asked if the price of fixed wireless will increase once the 24-month contract ends.
  - The AT&T presenter stated that there is equipment that can boost the wireless signal in the home but a wireless signal must first be available within the home.
  - A consumer advocate representative stated that the signal boosting equipment adds to the costs.
- A consumer group representative stated that someone may have a wireless Lifeline phone but may be unable to use the phone in his or her home. The consumer group representative also stated that just because a wireless coverage map shows coverage in an area, it does not necessarily mean that such coverage actually exists. Lastly, the consumer group representative asked why, if only 17 percent of the population remains to be transitioned to advanced services, is it so difficult to identify those people by area.
  - PUCO staff stated that the Commission needs to explore this area more by getting information from the telephone companies but PUCO staff does not want to get this information too soon because the landscape will continue to change. PUCO staff also stated that the Commission will distribute a survey at the

appropriate time to assist in gathering this information. Lastly, PUCO staff stated that the Commission is waiting for the FCC to release its local competition reports and that the Commission is still exploring the issue of self-identification.

**Level 3/MACC presentation questions/comments:**

- PUCO staff asked whether any of the businesses that the purchase services from a MACC provider is offering a retail residential telephone service.
  - The Level 3/MACC presenter answered no.
- PUCO staff asked if Level 3 and the other MACC providers are asking for wholesale access be offered at a reasonable and comparatively priced rate.
  - The Level 3/MACC presenter answered yes.
- PUCO staff stated that the Ohio statute focuses on residential customers and the wholesale market will be addressed by the FCC.

**Action items**

- Be prepared to discuss universal connectivity and expanded availability at the next meeting.

**Next meeting: April 7, 2016 at 1:00 pm.**

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<sup>i</sup> <http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/ohio-9-1-1-9-1-1-ohio-program-office/>

<sup>ii</sup> <http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/affordability-and-competition-for-protection-of-ohio-consumers-office-of-the-ohio-consumers-counsel/>

<sup>iii</sup> <http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/telecom-competition-in-ohio-ohio-telecom-association/>

<sup>iv</sup> <http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/the-ip-transition-to-21st-century-services-at-t-ohio/>

<sup>v</sup> <http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/preserving-the-network-compact-level-3-communications/>