The Telephone Network Transition
Collaborative Status Report
To The Public Utilities Commission of Ohio

January 2019
TABLE OF CONTENTS

EXECUTIVE SUMMARY ................................................................. 2

INTRODUCTION ................................................................................. 5

TOPICS ADDRESSED BY THE COLLABORATIVE .............................. 6

CONSUMER EDUCATION SUBGROUP ............................................. 14

CONCLUSIONS ............................................................................... 15

Appendix A ......................................................................................... 19
Executive Summary

On Sept. 28, 2015, Ohio’s FY 2016-2017 budget bill, Amended House Bill 64 (HB 64) of the 131st General Assembly (Telephone Network Transition Law), went into effect and addressed the telephone network transition. The Telephone Network Transition Law also directed the Public Utilities Commission of Ohio (PUCO) to establish rules to allow incumbent local exchange carriers (ILECs) to withdraw or abandon basic local exchange service (BLES), the regulated portion of their service.

BLES is a telephone line that offers unlimited local calls without additional features, such as caller ID, call forwarding and call waiting. It is distinct from service bundles, which may include telephone features, video services and/or internet access. Telephone companies may withdraw bundled services at any time, simply by notifying customers and the PUCO. Withdrawal of BLES requires a different process.

The Telephone Network Transition Law provides an exception to Ohio Revised Code (ORC) 4927.07(D), which prohibits an ILEC from withdrawing or abandoning BLES. ORC 4927.10 established a procedure for an ILEC to withdraw or abandon BLES once the Federal Communications Commission (FCC) has adopted an order permitting it to withdraw the interstate-access component of its BLES under 47 USC 214. The ILEC may withdraw or abandon the state-regulated portion of its BLES service in concert with the procedure to withdraw the interstate-access component of BLES set forth in Section 214 of the 1996 Telecommunications Act. Uncodified section 749.10(A) of HB 64 also requires the PUCO, not later than 90 days after the effective date of the legislation (Dec. 27, 2015), to establish a collaborative process to focus on the internet-protocol-network transition underway at the FCC. This process should result in a plan for moving customers from regulated basic local service in areas with competition to a new, post-transition service category called “voice service.” Voice service has virtually the same functions as BLES but “is not the same as basic local exchange service.” Voice service may be provided using any technology, including voice over internet protocol (VoIP) and wireless.

1 HB 64 amended ORC 4927.01, 4927.02, 4927.07, 4927.11 and 4927.15 and established ORC 4927.10 and 4927.101. Additionally, HB 64 included uncodified section 749.10, which establishes the Telephone Network Transition Collaborative and sets forth the collaborative process.
2 ORC 4927.01(A)(18).
The Collaborative participants shall consist of (uncodified Sec. 749.10(A)):

1. Incumbent local exchange carriers;
2. Any competitive local exchange carriers that provide BLES and are affected by the transition;
3. The Office of the Ohio Consumers’ Counsel;
4. A representative of cable operators;
5. At the invitation of the Commission, any other interested stakeholders; and
6. At the invitation of the Commission, members of the General Assembly.

The Collaborative process shall focus on (uncodified Sec. 749.10(B)):

1. Internet-protocol-network transition processes underway at the FCC;
2. Issues of universal connectivity;
3. Consumer protection;
4. Public safety;
5. Reliability;
6. Expanded availability of advanced services;
7. Affordability; and
8. Competition.

According to uncodified section 749.10(C), the Collaborative shall:

1. Review the following:
   a. Number and characteristics of BLES customers in Ohio;
   b. An evaluation of what alternatives are available to BLES customers, including both wireline and wireless alternatives; and
c. Prospect for the availability of alternatives where none currently exist.

2. Embark on an education campaign plan for BLES customers' eventual transition to advanced services (such as services requiring fiber and wireless technologies). The Collaborative is tasked with ensuring thorough public education concerning the transition.

If the collaborative process identifies residential BLES customers who will be unable to obtain voice service upon an ILEC’s withdrawal or abandonment of BLES, the Commission may later find that those customers are eligible for the petition process under ORC 4927.10(B). This statutory provision would enable protection of a group of customers who would not be able to obtain voice service, without each individual having to file a petition under ORC 4927.10(B).

The Collaborative held its first meeting in December 2015 with the intent to stay focused on those items outlined above and to not discuss or comment on the rules related to the telephone network transition that the Commission issued for comment in Case No. 14-1554-TP-ORD, acknowledging that those rules would follow the Commission’s formal rulemaking process.

The Collaborative sessions featured presentations from industry groups and experts as well as an update from the Consumer Education Subgroup. The goal of these early Collaborative sessions was to provide education and information to all parties, covering all the major issues. Certain issues were identified that require further study by the Collaborative. One example of the need for further study is a future granular study of vulnerable areas in the state in order to identify residential BLES customers that may not have sufficient alternative voice services. Another example is the identification and evaluation of any alternatives to determine whether they are reasonable and comparatively priced voice services, as well as an assessment of the prospect for the availability of any alternatives where none currently exist.

Certain Collaborative stakeholders believe that it is too early to begin a granular study due to factors such as the telephone companies’ acceptance of federal Connect
America Fund (CAF)\textsuperscript{3} subsidies, which must be used to deploy broadband with a voice component to FCC-identified unserved or underserved census blocks in Ohio. In addition, industry stakeholders stated in the Collaborative meetings held during 2016 that they do not expect to begin withdrawing their BLES offerings for at least two to three years.

The Collaborative process does not have an end date specified in uncodified section 749.10 of HB 64. As of the date of this report, the Collaborative has met a total of six times. It was recognized that the Collaborative would reconvene, unless otherwise requested by the Commission or its staff, in the event of certain triggers such as any action taken or further orders issued by the FCC; new or modified PUCO rules; or if an ILEC receives approval from the FCC to withdraw or abandon BLES services and files notice with the PUCO.

I. Introduction

The telephone network transition is underway in Ohio. Ohio’s telecommunication industry and its consumers are transitioning to new and advanced technologies at a rapid pace. According to the Ohio Telecom Association (OTA), “[o]ver the past nine years, wireless revenue has doubled, broadband revenue has quadrupled, and traditional local and long distance by Incumbent Local Exchange Carrier (ILEC) providers has dropped nearly 50 percent.”\textsuperscript{4} Furthermore, the FCC 2017 Voice Telephone Services report, released in November 2018, reflects on a national basis and over a three-year period, a continuing decline in retail switched access voice lines at 11 percent per year, while interconnected VoIP subscriptions increased at a compound annual growth rate of 8 percent, and mobile voice subscriptions increased at a compound annual growth rate of 2 percent.\textsuperscript{5}

\textsuperscript{3} CenturyLink, Cincinnati Bell, AT&T, Frontier Communications, FairPoint Communications and Windstream Communications have all accepted FCC funding in the form of annual subsidies to offer broadband service to rural homes and businesses that are currently not being served. Connect America Fund, WC Docket No. 10-90 (Public Notices) (rel. June 16, 2015, Aug. 19, 2015, and Aug. 28, 2015).

\textsuperscript{4} Presentation by Charley Moses, President Ohio Telecom Association, Feb. 23, 2016 “Telecom Competition in Ohio.”

The Telephone Network Transition Law furthers the advancement of this transition toward new and advanced technology networks – networks that will spur development, help create jobs and propel Ohio’s communications infrastructure into the 21st century. To assist in this effort, ORC 4927.10 permits an ILEC to withdraw or abandon regulated BLES if it receives permission from the FCC to withdraw the portion of BLES under the FCC’s jurisdiction (i.e., access to long distance networks).

ORC 4927.10 provides a vehicle for a residential BLES customers to petition the PUCO should the residential BLES customer be unable to find a reasonable and comparatively priced alternative to BLES. As noted above, prior to an ILEC withdrawing BLES, the FCC must grant the ILEC permission to withdraw that portion of BLES that is under FCC jurisdiction. As part of the FCC process, the ILEC must notify affected customers about its pending FCC request and notify the affected customer that they have the right to file an objection or other comments with the FCC.\(^6\) The FCC is reviewing this process as part of its continuing oversight of technology transitions.\(^7\)

Through the Collaborative, the PUCO, the communications industry, consumer groups and other stakeholders are working together to prepare for a successful and ongoing transition, with the ultimate goal of helping customers maintain access to reasonable and comparatively priced voice service.

II. Topics Addressed by the Collaborative

IP Network Transition Underway at the FCC

While the Telephone Network Transition Law and this Collaborative are focused on the technology transition that is occurring within the state of Ohio, the FCC is also focused on a technology transition at the federal level. These are separate processes, but they are also linked to one another. Prior to an ILEC being relieved of its carrier of last resort (COLR) obligation and corresponding requirement to provide BLES in Ohio, the ILEC must first be permitted to withdraw the interstate access component of its BLES

---

\(^6\) 47 USC 214(a); 47 CFR 63.71.

by the FCC, pursuant to 47 U.S.C. 214. As relief from the COLR and BLES obligations are prerequisites for the state-level technology transition to take place, ORC 4927.10 has, in effect, adopted the internet-protocol (IP) network transition that is underway at the federal level as a trigger for Ohio’s IP network transition.

The FCC has been investigating the technology transition since the beginning of 2014, when it began evaluating the impact of such a transition on consumers. The FCC has offered proposals and sought comment on how to address issues arising out of the transition. Throughout this process, the FCC has maintained four guiding principles: competition, consumer protection, public safety and national security, and universal access. The FCC’s goal is to facilitate the transition to advanced communications in a way that preserves core values on a technology neutral basis. Key to this goal are the ideas of protecting consumers through information about their choices and preserving competition where it presently exists.

The transition to advanced communications networks will most likely result in the retirement of existing copper networks. This retirement has raised concerns that consumers do not understand how they will be affected should retirement of the copper network occur. Consequently, the FCC has instituted a requirement that customers be provided notice when copper to the premises is retired without consent. Such notice must clearly inform the consumer of the impact of the retirement, its timing and the availability of alternative services. Further, additional notice requirements were extended or applied to interconnecting carriers as well as public safety, state and tribal authorities.

At the federal level, copper retirement only requires that a notice be provided to the FCC as long as there is no loss of service. If there is a loss of service, carriers must seek FCC approval prior to the discontinuance. Further, carriers must determine if such a discontinuance to wholesale customers will result in a discontinuance to end users as well. If so, approval from the FCC must be sought by the carrier.

---

8 ORC 4927.10(A).
10 Id.
11 Id.
12 Id.
13 Id.
The timing of the technology transition remains an open-ended question, as the FCC has not set a specific timeline for its progression. The FCC has been observing technology transition trials in three locations. AT&T conducted trials in Carbon Hill, Alabama and Kings Point, Florida, while CenturyLink is conducting trials for business customers in Las Vegas, Nevada. From these trials, the FCC is seeking to establish concrete criteria for what constitutes “adequate substitutes” for legacy services. The FCC has taken a functional approach to evaluating the scope of a “service,” articulating that not every functionality is, in fact, part of the service.

**Universal Connectivity**

Universal availability of telephone service to all who want the service has long been the goal at both the state and federal levels. This goal has largely been achieved with traditional landline service. With the technology transition, however, questions of universal connectivity/availability have once again arisen. During the Collaborative meetings, it was expressed that there is little to no broadband coverage in southeastern Ohio. According to John Hoag, Ph.D., Ohio University, availability of broadband service, defined as 25 megabits per second downstream, is at 95 percent in Ohio; however, quality coverage in Appalachia Ohio is substantially behind that in Ohio’s urban centers. While the Telephone Network Transition Law includes a failsafe mechanism designed to ensure that all Ohioans maintain access to voice service regardless of the technology used, the challenge lies in transitioning all areas of Ohio to advanced communications networks as the means of providing this service.

Integral to the issue of universal connectivity is the question of interoperability. If devices are not interoperable with the new, advanced networks that will replace the traditional landline network over which they presently operate, then these devices cannot be universally connected. Devices such as medical alert systems, remote patient monitoring equipment and alarm systems currently rely primarily on the traditional, copper-based landline to operate. Consumers that rely on these devices must be able to use them with the networks that emerge following the technology transition. To this

---

16 Id.
18 ORC 4927.10.
end, in 2016, the FCC required that all such advanced communications networks that carriers may transition to provide interoperability with existing devices through 2025.  

**Consumer Protection**

The transition from traditional voice telephone service using legacy networks to advanced communications services using IP or wireless networks promises many benefits for consumers. Nonetheless, the achievement of these benefits is not without risk if appropriate measures are not taken to ensure the protection of consumers. The industry and consumer advocates both agree that protecting consumers is an integral part of this transition that permeates each of the other subject areas that the Telephone Network Transition Law directs the Collaborative to address.

The Telephone Network Transition Law sets forth a framework for protecting consumers with the inclusion of a “failsafe” mechanism that is intended to ensure that no customer is left without voice service in the technology transition. Specifically, ORC 4927.10(B) provides a petition process for a customer to pursue should the customer be unable to obtain reasonable and comparatively priced voice service upon a carrier’s withdrawal or abandonment of BLES. Further, the collaborative process may identify residential BLES customers who will be unable to obtain voice service upon an ILEC’s withdrawal or abandonment of BLES. These mechanisms, however, are a last line of defense in the protection of consumers. Prior to and during the technology transition, it

---


20 Prior to withdrawal or abandonment of BLES, the ILEC must provide at least one hundred twenty days notice to the PUCO and its affected customers of the withdrawal or abandonment. An affected customer may file a petition with the PUCO not later than 90 days prior to the effective date of the withdrawal or abandonment if the customer is unable to obtain reasonable and comparatively priced voice service. The PUCO must issue an order disposing of the petition within 90 days of the petition’s filing. If, after investigation, the PUCO determines that no reasonable and comparatively priced voice service is available to the affected customer, the PUCO will attempt to identify a willing provider of such service. If no willing provider of reasonable and comparatively priced voice service can be identified, the PUCO may order the ILEC to provide reasonable and comparatively priced voice service to the affected customer using and technology or service arrangement. If, after 12 months, no alternative provider of reasonable and comparatively priced voice service is identified, the PUCO may require the ILEC to provide such service for an additional twelve months. If, at the end of the additional 12 months, no alternative provider is identified, the PUCO may require the ILEC to continue providing voice service to the affected customer until a willing provider of reasonable and comparatively priced voice service is identified.
is important that at-risk consumers are identified and educated as to the transition process and advanced communications networks. Doing so will help to assure the ongoing protection of all Ohioans.

Consumer identification may potentially raise concerns regarding the FCC’s customer proprietary network information (CPNI) rules, which protect the confidentiality of customer information held by their local telephone company. While the FCC will most likely have to reconcile the issues of identifying at-risk customers while protecting their CPNI, customer self-identification provides a means of identifying at-risk customers in the interim. To this end, stakeholders in the Collaborative process, including social service agencies and consumer advocates, may assist in this self-identification process by educating their constituencies.

Collaborative participants made clear that consumer protection extends beyond simply identifying and educating at-risk consumers. Consumer protection must also encompass availability, affordability and reliability. All consumers must have access to affordable and reliable voice service, regardless of the technology employed, following the technology transition.

Public Safety

Several stakeholders addressed the issue of public safety. Concerns included the ability to contact first responders through 9-1-1, the availability of battery back up and interconnectivity with medical monitoring devices. Ensuring public safety requires that consumers be able to contact not just 9-1-1, but other persons and entities such as doctors, hospitals and pharmacists, whose roles in the community are essential to protect the overall welfare of the public.21

The technology transition is occurring at an opportunistic time with regard to 9-1-1, as that service is transitioning from traditional landline-based 9-1-1 service to Next Generation 9-1-1 (NG9-1-1), which will allow for the transmission of text, pictures and video during an emergency. The confluence of NG9-1-1 technologies with advanced communications networks that will come with the technology transition will provide opportunities to better protect Ohioans in emergency situations. Nonetheless, counties

and municipalities will transition to NG9-1-1 at different times and at different paces, which will result in both the traditional 9-1-1 system and NG9-1-1 operating in Ohio simultaneously. Accordingly, the voice services that replace BLES must be able to adequately connect to both 9-1-1 systems.

Presently, when a call is made to 9-1-1 from a landline phone, the public safety answering point (PSAP) that receives the call will see the caller’s exact location through the 9-1-1 system. When the call to 9-1-1 is made from a wireless phone, however, the PSAP works off of GPS and cell tower triangulation to determine the general location of the caller. The PSAP will not see the caller’s exact location as it does from a landline phone. Following an ILEC’s withdrawal of BLES, voice service may be provided using any technology, including wireless. Additionally, since many voice customers will likely receive their voice service via wireless technology, it is important that they be educated about its limitations with regard to 9-1-1 location identification. While progress has been made with wireless 9-1-1 location identification, it is imperative that wireless voice service and NG9-1-1 technologies continue to push for further advancement in this area.

The Collaborative also addressed public safety in the context of interoperability between advanced communications networks and existing safety devices such as medical devices and alarm systems that presently rely on a connection to the landline network. Following the Collaborative addressing this issue, the FCC spoke to that issue in its July 15, 2016 order, which requires that these emerging networks be able to interconnect with existing devices through 2025. It is anticipated that by that time, advancements in both the networks and devices will render this issue moot as both will be designed for such interoperability.

Reliability

Reliability can be described in many ways. As one consumer advocate noted, reliability of service is an essential consumer protection, and consequently consumers should continue to have reliable phone service at all times. The consumer advocate presented data that suggests that there is a decline in service quality as traditional access lines have decreased, pointing to national statistics and to the PUCO’s call center

---

22 FCC Transition Order at para. 158.
complaint data. The consumer advocate also suggested that the minimum basic local service standards should apply to any alternative service replacing a telephone company’s BLES, including such things as credits for outages. The Collaborative noted that the law for alternative voice services does not require the same service standards that are applied today for BLES service. The FCC sees reliability as not only the ability to place calls but to ensure access to 9-1-1 services. Although there are differing ideas of how reliability should be defined, there is an acknowledgement among the stakeholders, and consistent with Ohio law, state policy and the FCC, that we must continue to ensure the availability of reliable voice service to consumers throughout the state, including access to 9-1-1 service.

**Expanded Availability of Advanced Services**

Technology advancements continue to evolve to accommodate the needs of new technologies such as medical and security technologies and the demands of the customers served. The Collaborative heard from various industry experts regarding the concerns of citizens who primarily rely on landlines to provide access to vital health monitoring services. According to an industry vendor of emergency response services (ERS), while the trend of the ERS industry is to move to wireless services, which currently provides 39.5 percent cellular based service versus 22 percent analog service, this does not guarantee sufficient coverage, especially in rural areas of Ohio.

The Collaborative also heard from an ILEC representative who described other services the ILEC offers that are efficient and can actually bypass the internet, such as telemedicine service, which is served primarily over broadband lines or digital subscriber lines (DSL).24 The DSL service connects a health care provider through its central office directly to a patient’s home without connecting to the internet. Additionally, another ILEC presented information on its high-speed fiber technology service, which provides advanced high speed internet, phone and TV services delivered via IP over fiber or via copper. The presenter provided a detailed, technical explanation of how its service is delivered to a customer’s home.

---

24 DSL is a wireline transmission technology that transmits data faster than dial-up over traditional copper telephone lines already installed to homes and businesses. [https://www.fcc.gov/consumers/guides/getting-broadband](https://www.fcc.gov/consumers/guides/getting-broadband)
The PUCO questioned whether it is feasible, in urban areas, to replace copper with fiber to the home (FTTH) and whether there is a need to transition to fiber in order to provide digital phone service. The ILEC representative replied that in order to get to market quicker, the company chose to use its legacy copper facilities, where such facilities were viable. The ILEC representative also explained that FTTH was not necessarily required for basic digital phone service where viable copper facilities exist. Furthermore, legacy copper facilities are quite often used by competitors to offer advanced services to their customers. It will be problematic for those competitors that are using an ILEC’s copper facilities if the ILEC decides to retire, remove or no longer maintain these copper facilities.

Advanced services, such as the fiber technology described above, typically rely on the power grid. Thus, a battery backup would be necessary in the case of power outages. Although battery backup is offered at point of sale, it is optional for the customer to purchase and is not required by the FCC. According to the ILEC representative, the majority of its customers decline to purchase a battery backup, claiming that it is unnecessary because of cell phones which can be charged in cars. It does not seem that the $99 one-time charge for battery back up is an issue in the decision to purchase for most customers.

**Affordability**

The issue of affordability is one that causes differing views among the presenters. Consumer advocates would like to preserve, to a certain extent, the “status quo” of BLES. They assert that the new services that the technology transition brings may require the purchase of bundled services, including features and functionalities that a customer may not want or necessarily need, rather than the basic access line that BLES offers, which could potentially drive up the cost of the service. On the other hand, ILECs investing billions of dollars in Ohio to deploy the advanced communications networks have maintained that they do not want to lose their embedded customer bases, but rather wish to continue serving these customers through alternative technologies. Accordingly, customer adoption of these new technologies is

---

paramount. Perhaps, then, the issue of affordability must ultimately be weighed by preserving consumer choice and availability versus the value it brings.27

**Competition**

The IP transition brings differing views of competition among industry stakeholders. The OCC maintains that there is competition for bundled services but not for BLES. The ILECs assert that there is sufficient competition in Ohio’s communications markets, citing the continuing decline in landlines and the increased choices of wireless services.28 The competitors maintain that operating in an IP world requires maintaining state responsibility to ensure that all IP interconnection agreements are transparent and filed in accordance with sections 251 and 252 of the Telecommunications Act.29 “Preserving the network compact,” as one competitor stated, and only through preserving competition by providing reasonably comparable wholesale access and pricing, is required so that competition will thrive.30

**III. Consumer Education Subgroup**

While not specifically one of the eight topics in uncodified section 749.10(B) of HB 64, the Collaborative was directed in section 749.10(C) to embark upon a customer education campaign for BLES customers’ eventual transition to advanced services. To this end, the Collaborative established the Consumer Education Subgroup (CES) to make recommendations on what approach the Collaborative and the stakeholders should take in educating consumers regarding the technology transition. The CES concluded that it is best to respond to consumer inquiries in a reactive manner rather attempt to educate consumers proactively. To this end, the CES developed a fact sheet for Collaborative members to use when responding to their constituencies. The CES

---

27 The PUCO has a pending rulemaking in Case No. 14-1554-TP-ORD where “reasonable and comparatively priced voice service” is being defined.

28 ILECs continue to lose landlines at a rate of 6 percent – 10 percent annually. 47 percent of homes have eliminated, or have never subscribed to landline phone service; there are more wireless accounts in Ohio than people. [http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/telecom-competition-in-ohio-ohio-telecom-association/ Feb. 23, 2016](http://www.puco.ohio.gov/puco/index.cfm/be-informed/consumer-topics/telephone-network-transition/telecom-competition-in-ohio-ohio-telecom-association/)


made clear that the fact sheet serves only as a template for Collaborative members who choose to use it. It does not limit what Collaborative members may convey and they are free to customize it as they wish. The CES’ recommendations on education also does not limit the education the PUCO may provide. Additionally, the CES developed a list of frequently asked questions and answers (FAQ) taken from inquiries received by the PUCO’s call center. The FAQ was added to the Collaborative web page and may be updated from time to time.

The CES identified three triggers that could necessitate further action with regard to consumer outreach and education from the Collaborative and/or the CES. These triggers include FCC action, new PUCO rules, and ILEC approval from the FCC to withdraw the interstate access component and subsequent notice to the Commission. The occurrence of any of these triggers may necessitate that the Collaborative reconvene or take other action.

III. Conclusion

The six meetings of the Collaborative provided an opportunity for substantive input from the many stakeholders. Based on the input and dialogue in the Collaborative, the PUCO Staff would share the following three conclusions. The first conclusion is that the network transition is a positive transition for consumers. The IP transition will happen—and is, in fact happening now—and will bring with it many benefits for consumers. As with many changes, however, a certain amount of uncertainty accompanies the IP transition. While it is important to address this uncertainty, it is equally important to make sure that all Ohioans are in a position to enjoy the benefits from this transition.

Second, ensuring that all Ohioans have access to affordable voice service is key to successfully transitioning from the traditional telephone network to advanced communications networks. This has been a recurring concern articulated by some Collaborative participants and as well as by customers who have provided input to the Collaborative, and has primarily been expressed with regard to service in eastern and southeastern Ohio. Based upon the presentations to the Collaborative by consumer interests, these regions of the state include pockets where wireless service is unreliable and broadband service is not yet available. When considering the issue of availability,
reliability of service must also be taken into account. Consequently, to further the long-established goal of universally available telephone service first set forth in the Communications Act of 1934, it is essential to promote and carry out the state policy of ensuring the availability of adequate BLES or voice service to citizens throughout the state as set forth in ORC 4927.02(A)(1).

Third, but of great importance, is ensuring the continuity of 9-1-1 service to all Ohioans throughout the transition process and after. Access to 9-1-1 service is not a luxury, but rather a necessity that we all depend upon in times of emergency. Accordingly, post-transition, it is imperative that universal access to 9-1-1 remain available. Carriers making the transition to IP networks must work with local 9-1-1 coordinators to ensure that customer equipment, i.e., PSAP equipment, is compatible with and connects to the new IP network. This collaboration with local emergency responders cannot be solely limited to ensuring compatibility with existing 9-1-1 equipment but must also take into account NG 9-1-1 technologies as they are deployed across the state.

Through its first six meetings, the Collaborative addressed the eight topics set forth in the Telephone Network Transition Law and has now provided its summary of and conclusions on these topics in this report. Thus far, the focus of the Collaborative has been fact gathering and self-education. Going forward, the Collaborative must commence upon the tasks set forth for it in uncodified section 749.10(B) of HB 64. Specifically, these include conducting a review of the number and characteristics of BLES customers in Ohio; evaluating what alternatives are available to BLES customers, including both wireline and wireless alternatives; and, determining the prospect for the availability of alternatives where none currently exist. Additionally, the Collaborative must embark upon an educational campaign plan to ensure that the public is thoroughly educated about the telephone network transition.

To accomplish these tasks, the Collaborative will have to begin gathering data concerning BLES customers from Ohio’s ILECs. This data will have to be collected at a very granular level to allow the Collaborative to identify, quantify and locate BLES customers throughout the state. Of course, the Collaborative must take all necessary precautions to protect the confidentiality of company proprietary information, even among Collaborative members. Further, once the Collaborative has determined the
number and locations of BLES customers, it must undertake an evaluation of the available alternatives, including both wireline and wireless alternatives, as well as the prospect of future available alternatives... This too will require considerable input from the industry, both regulated and non-regulated entities, with regard to present and planned service offerings. Again, the Collaborative must ensure that confidentiality is protected.

The PUCO staff provides the following observations regarding the important work remaining for the PUCO and the Collaborative process, pursuant to the Telephone Network Transition Law. At the outset of the Collaborative process in late 2015, the industry indicated that it was two to three years from first seeking COLR relief and withdrawing BLES. At that time, the Collaborative collectively agreed that it was premature to begin collecting data. More than a year has passed since then, however, and during that time several ILECs that had not previously done so, have accepted CAF support. With this support comes commitments to deploy broadband in unserved or underserved areas. As a result of these commitments, the network transition may be accelerated in some parts of the state. Therefore, it may be necessary for the Collaborative begin its data collection process soon.

Acknowledgements

Public Utilities Commission of Ohio (PUCO) would like to thank the participants of the Telephone Network Transition Collaborative (Collaborative), comprised of representatives from the telephone, cable and wireless industry; consumer advocates representing residential consumers, senior citizens and Ohio Appalachian counties; competitive telecommunication providers; and interested consumers. This report is the summary of several months of presentations and discussions.
Disclaimer

This report does not represent the views of the Commission or an endorsed policy. Any policy recommendations or goals outlined in this report do not commit the participating stakeholders to implementing or adopting such policies. The report is intended to serve as a summary document for the Commission to consider when addressing telephone network transition policy issues.
Appendix A

Telephone Network Transition website:
http://www.puco.ohio.gov/be-informed/consumer-topics/telephone-network-transition

Collaborative Meetings:
Dec. 3, 2015 agenda
Dec. 3, 2015 meeting minutes
Jan. 19, 2016 agenda
  • Consumer Protection Issues - OCC presentation
    ▪ Consumer Protection Issues - OCC presentation text
  • Technology Transitions Update: Emerging Wireline Networks and Services - FCC presentation

Jan. 19, 2016 meeting minutes
Feb. 23, 2016 agenda
  • The IP Transition to 21st Century Services - AT&T Ohio presentation
  • Ohio 9-1-1 - 9-1-1 Ohio Program Office presentation
  • Telecom Competition in Ohio - Ohio Telecom Association presentation
  • Affordability and Competition for Protection of Ohio Consumers - OCC presentation
    ▪ Affordability and Competition for Protection of Ohio Consumers - OCC presentation text
  • Preserving the Network Compact - Level 3 Communications presentation

Feb. 23, 2016 meeting minutes
April 7, 2016 agenda
  • Fioptics - Cincinnati Bell presentation
  • High Speed Connectivity - Frontier presentation
  • The Continuing Role for State Commissions in an IP World - Ohio Cable Telecom Association presentation
  • Impact of Telecom Transition on ERS - VRI presentation
April 7, 2016 meeting minutes with VRI questions addendum

May 19, 2016 agenda
- Reliability and Consumer Protection - OCC presentation
- Telecom Collaborative Consumer Education Subgroup presentation
- Telephone network transition in Ohio - Fact sheet

May 19, 2016 meeting minutes
- Telephone network transition frequently asked questions

Oct. 4, 2016 agenda
Oct. 4, 2016 meeting minutes
- FCC discussion points