

hybrid TDM-IP soft switches; in others, they are wholly IP soft switches that integrate TDM peripherals. In all cases, these “hybrid” or integrated network platforms appear to constitute an efficient, effective and economical way for RLECs to transition from TDM to IP with minimal disruption of the services and service options of their rural customers.

WTA members with integrated IP/TDM networks are not aware of significant problems with the completion of VoIP calls originating in their service areas. However, with respect to VoIP calls to their rural customers, WTA members are not certain whether what appear to be significant numbers of uncompleted or dropped calls are the result of the unlawful rural call non-completion practices under investigation in WC Docket No. 13-39, or are the result of technical issues involving certain VoIP service providers and facilities.

WTA notes that there is substantial confusion and ambiguity in the definition of “VoIP interconnection” at this time. This appears due, among other things, to: (a) failure to distinguish clearly between managed VoIP services and best efforts VoIP services; (b) frequent conversions of calls to and from TDM and IP technologies as they traverse networks, such that a substantial portion of voice calls appear to be TDM calls along some portions of their route and IP calls along others; and (c) confusion as to the use and capabilities of SS7 and SIP for call set-up.

Likewise, cost issues are not clear cut. Whereas soft switches appear less expensive than circuit switches, certain types of VoIP and other IP services require additional equipment such as Session Border Controllers, significant upgrades to existing network facilities and customer premises equipment, and substantial increases in middle mile costs and capacities. In some instances, these additional costs may make the RLEC expense of providing VoIP services comparable to, or even greater than, the expense of providing traditional circuit switched TDM voice services.

WTA will periodically bring to the attention of the Task Force relevant experiences and findings of its members, particularly those using integrated IP/TDM network platforms. It will do this on a voluntary basis, and fully agrees with the Commission that participation in technical trials should be wholly voluntary for providers. Particularly during this time of increasing broadband investment needs, limited high-cost support, decreasing intercarrier compensation and increasing regulatory reporting requirements, many RLECs cannot justify or afford the additional expense of participating in formal technical trials.

Finally, WTA reiterates that the major issues regarding VoIP interconnection are going to be regulatory issues that must be considered, negotiated and resolved on an industry-wide basis and that cannot be effectively and equitably addressed via technical or other trials. As a prime example, the application of Sections 251 and 252 of the Act to VoIP and other IP interconnection procedures, points, arrangements and compensation must be considered on an industry-wide basis. Likewise, discussions of investment incentives and universal service support issues need to encompass the network upgrades and additional costs (such as middle mile costs) that will be relevant to the IP world. Put simply, an important key to the success of the future IP world will be the continued ability of all Americans, including rural residents, to have reasonably comparable and affordable access to the public network.

Public Safety – NG911 Trials

Whereas WTA agrees that public safety is a paramount value that must be protected as technologies transition, it is concerned with the impacts of Commission trials and interventions in local public safety networks and arrangements that have long been the purview of state and local governments.

WTA members and other RLECs have long worked with state and local government agencies to plan, implement and operate 911, E911 and NG911 systems. Essentially, these efforts take place as follows: the state and local agencies plan, locate, construct, equip, implement, operate and fund Public Safety Access Points (“PSAPs”) and other elements of their public safety networks, while the RLECs place, operate and maintain the lines and services ordered by the public safety agencies. While RLECs advise and coordinate with local officials on technical matters (in fact, in many rural areas, RLEC employees wear multiple hats as local officials and/or public safety volunteers), the critical facts are that state and local officials design local public safety systems and facilities to meet the localized needs and resources of their areas and that RLECs and other telecommunications carriers are primarily the suppliers of the communications links ordered by local officials.

The Commission can fulfill an important role as an information resource, providing state and local officials with useful data regarding emerging technologies and equipment, helping them avoid NG911 implementation problems and wasteful investments, and serving as a clearinghouse for best practices and other useful information. However, if the Commission gets involved in conducting NG911 trials, it is going to be likely to place RLECs in the middle of conflicts between federal and state-local efforts, or at best to duplicate planning and testing activities already being conducted in local communities by state and local officials.

WTA recommends that the Commission hold off on NG911 trials at this time, or in the alternative, that it conduct only a limited number of NG911 trials in areas where state and local public safety officials are fully in agreement with all aspects of the trial.

Conclusion

WTA believes that the TDM-to-IP transition is a critically important era in the history of the telecommunications industry. It appreciates the opportunity to participate in this proceeding, and will continue its efforts to bring the relevant experiences of its RLEC members to the Task Force's attention. Whereas it is not clear what specific types of VoIP interconnection technical trials may be useful at this point, the experiences of WTA members with their integrated IP/TDM network platforms should provide useful information as the TDM-to-IP transition proceeds.

Respectfully submitted
WESTERN TELECOMMUNICATIONS ALLIANCE

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