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October 30, 2015

#### REDACTED FOR PUBLIC INSPECTION

Via Electronic Submission

Ex parte

### REDACTED

HECENTED TISC

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Portals II, Room TW-A325 Washington, DC 20554

> **Re:** Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353

Dear Ms. Dortch:

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On October 28, 2015, Frank Simone, Christopher Heimann, Terri Hoskins, Melissa Waksman and the undersigned of AT&T met with Dan Kahn, Jay Schwarz, Michele Berlove, Heather Hendrickson, Madeleine Findley, Rodney McDonald, and Randy Clarke of the Wireline Competition Bureau concerning the above-captioned matters. The purpose of the meeting was to update the Commission on AT&T's plan to grandfather certain services in the AT&T Technology Transition Trials in West Delray Beach, FL and Carbon Hill, AL<sup>1</sup>.

The attached presentation describes the business services AT&T seeks to grandfather, the proposed timeline for doing so, the number of customers that subscribe to these services, and the IP replacement services that are available to customers. The services being grandfathered are a mix of jurisdictionally intrastate and interstate services and are a mix of voice and data services. AT&T expects to file section 214 applications to grandfather the interstate services on November 4, 2015. The proposed grandfather effective date is February 16, 2016.

The attachment contains highly confidential information entitled to protection pursuant to the terms of the Protective Order and Second Protective Order in these dockets. *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition,* GN Docket Nos. 13-5, 12-353, Protective Order, DA 14-272 (rel. Feb. 27, 2014); *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition,* GN Docket Nos. 13-5, 12-353, Second Protective Order, DA 14-273 (rel. Feb. 27, 2014). All highly confidential information in the attached document has been clearly marked as such.

<sup>&</sup>lt;sup>1</sup> "Grandfather" is the discontinuance of service to new customers. Existing customers have the option to continue their legacy service and, for these section 214 applications, may move or change their service at their existing location.

Please do not hesitate to contact me with any questions regarding this matter.

Sincerely, /s/ David L. Talbott

### ATTACHMENT

cc: R. Clarke D. Kahn J. Schwarz M. Berlove H. Hendrickson M. Findley R. McDonald

# **AT&T Wire Center Trials** First Tranche of Services to be Grandfathered

October 28, 2015

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# **Grandfather Plan**

### AT&T is planning to grandfather eight services in the two trial wire centers

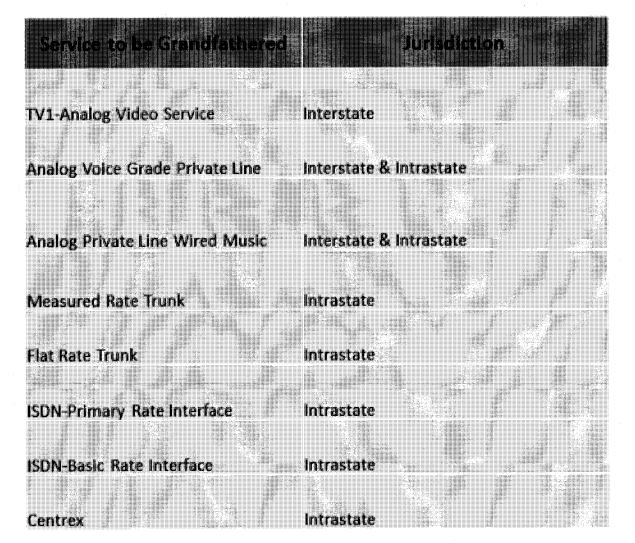
- These are all business services
- There is a mix of voice and data services
- There are a total of business customers purchasing these services
- There is a mix of intrastate and interstate jurisdictions
- One service is solely jurisdictionally interstate and two are offered under both jurisdictions
- AT&T will file § 214 applications with the FCC to grandfather the three interstate services
- AT&T will follow the applicable state rules for the grandfathering of intrastate services
- AT&T is also meeting this week with the AL and FL Public Utility Commissions

# Timeline

DATE	EVENT
11/3/2015	Customer notice letters are mailed
11/4/2015	214 applications filed with FCC
11/18/2015	Expect FCC to release Public Notice
12/18/2015	AL tariff change filed
12/31/2015	Notice sent to wholesale customers
2/15/2016	FL & AL guidebook changes filed
2/16/2016	Proposed grandfather effective date

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### Services to be Grandfathered



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#### Product Profile: TV1 – Analog Video Service Retail Wholesale Transports one channel of video and up to four audio Section 7.2.5 - Tariff F.C.C. No. 1 FL: cable and other competitors cover Interstate only http://cpr.att.com/pdf/fcc/1007.pdf (pg 7approximately 97% of all business channels at 30Hz to 6.6MHz; Available on either a transmit 41) or receive basis (one-way service). Offered as point to point, locations. Section 23.5.2.5.1 - Tariff F.C.C. No. 1 AL: cable and other competitors cover point to hub basis. Transported over fiber. http://cpr.att.com/pdf/fcc/1023.pdf (pg approximately 56% of business 23-165) locations.

IP Replacement	Description See Appendix for Full Description and Benefits	Eunction & Factures	<b>Coverige</b>
Serial Component Video Service (SCVS)	Serial Component Video – Serial Component Video Service (SCVS) provides one-way transport of high quality digital video signals and audio signals in an uncompressed format with no loss of video quality.	SCVS is a standards based 270 Mbps digital video. Voice required on another circuit however video transport is superior	Comparable to legacy service
High Definition Video Transport (HDVT)	HDVT is a one-way transmission of a digital video signal between customers designated premises or between customer designated premises and an AT&T Central Office, where available. Transmits raw uncompressed HD-SDI 1.485Gbps. Point to point one-way video service over fiber available on either a transmit or receive basis.	The following standard formats are supported: SMPTE 292M, SMPTE 310M, SMPTE 259M, SMPTE 305M, DVB-ASI. Supports the day-to-day demand of broadcasters, e.g. video contribution and distribution via multiple media.	Comparable to legacy service



	Wholesale		
Description	Teriff / Guidebook		Competitive Alternatives
Analog Private Line (APL) services provide point to point and point to multipoint communications between different end user locations at speeds generally below 64Kpbs. The Analog Private Line services have been around for decades. New and current customers are working to replace Analog Private Line services with alternative transport technologies.	B3 http://cpr.att.com/pdf/al/h003.pdf http://cpr.att.com/pdf/il/h003.pdf E7.2.3 - Intrastate Access (E tariff AL) http://cpr.web att.com/pdf/al/e007.pdf (pg 9.1) E7.2.3 - Intrastate Access (E tariff FL) http://cpr.web att.com/pdf/il/e007.pdf (pg 10) Section 7.2.3 - Tariff F.C.C. No. 1 http://cpr.web.att.com/pdf/fcc/1007.pdf (pg 7- 25) Section 23.5.2.3 - Tariff F.C.C. No. 1 http://cpr.stt.com/pdf/fcc/1023.pdf (pg 23-151)	Interstate and intrastate (existing customers are purchasing only intrastate service)	FL - 1 out of 2 customers do not have a cable or other competitor. The other has 2 competitors. The customers are also included in the 97% of all business locations which have at least one cable or other competitor . AL -100% of customers have one cable or other competitor. These customers are also included in the 56% of business locations which have at least one cable or other

Retail

competitor.

### Product Profile: Analog Voice Grade Private Line

IP Replacement	Description See Appendix for Full Description and Benefits	Function & Features	Coverage
AT&T Switched Ethernet (ASE)	ASE offers Ethernet connectivity for customers with one or more locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change.	ASE provides options for synchronous or asynchronous and symmetrical or nonsymmetrical data transmission. ASE and Business DSL services do not	May vary by location; expected to cover approximately 88% of business locations by EoY 2017
Business DSL Internet – Broadband service option (IPDSL/vDSL)	AT&T Business DSL Internet Service is a high speed Internet service for enterprise customers.	provide power to the customer's equipment. Both services can transmit data much faster than Analog Private Line services.	AL: Approximately 50% of Business locations FL: Approximately 39% of Business locations
U-verse High Speed Internet Business Edition	U-verse allows simultaneous voice and data on the same line	With the addition of U-verse voice, capabilities are comparable.	Approximately 49% of the Business locations in AL and 39% in FL



	Wholesale		ale 💼 💼
Description	Tariff/Guidenok		Competitive Alternatives
Wired Music Service provides transmission of music audio signals at 50-15,000 Hz, 200-3,500 Hz, 100-5,000 Hz or 50- 8,000 Hz. The main application is music transmitted over	Section 7.4.2 – Tariff F.C.C. No. 1 http://cpr.att.com/pdf/fcc/1007.pdf (pg 7-38)	Interstate and intrastate	Program distribution can be done via satellite and internet
telephone lines or radio station relaysto high elevations for transmission.	E7.2.4 - Intrastate Guidebook (E tariff AL) http://cpr.att.com/pdf/al/e007.pdf (pg 35)		

Retail

### **Replacement IP Products – Comparison Overviews**

Product Profile: Analog Private Line Wired Music

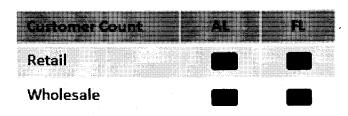
IP Replacement Description See Appendix for Full Description and B	encilis	Function & Features	Coverage
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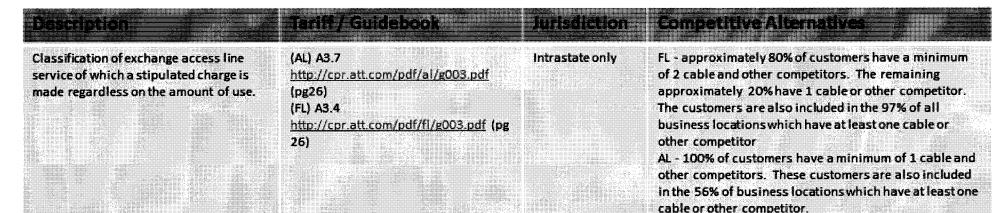
#### Product Profile: Measured Rate Trunk Retail Wholesale Classification of exchange service which is charged on the (AL) A3.20.7 Intrastate only AL - 56% of business locations have at basis of local usage and determined by the number of calls, http://cpr.web.att.com/pdf/al/g003.pdf least one cable or other competitor. (pg 4) distance of calls and time of day. FL: not applicable (FL) not applicable

IP Replecemen	t Description See Appendix for Full Description and Benefits	Function & Features	<b></b>
IP Flexible Reach	AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers' phone sets.	Comparable to
VDNA-E	AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution.	Local Toll and LD usage are not included with legacy service; IP services include an all-	legacy service
Office@Hand	A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free	distance voice plan; usage caps are tailored to customer need	



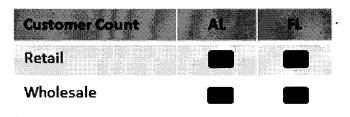
# Product Profile: Flat Rate Trunk





Pheparement.	Description See Appendix for full Description and Benefits	Function & Centures	Coverage
IP Flexible Reach	AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers' phone sets.	Comparable
VDNA-E	AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution.	Local Toll and LD usage are not included with legacy service; IP	to legacy service
Office@Hand	A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free	services include an all-distance voice plan; usage caps are tailored to customer need	

## Product Profile: Primary Rate ISDN (PRI)



**Competitive** Alternative

### Tariff / Guidebook

Integrated Services Digital Network Primary Rate Interface (ISDN PRI) is a voice and data service that provides highvolume access to the public switched telephone network (PSTN). This service lets customers transmit data at high speeds to accommodate voice, data, image, and video over the same digital facilities. ISDN PRI provides 23 digital channels over one transport line (a 24th channel carries signaling information). This service offers customers one T1 circuit with 23 separate voice lines or a combination of services

escription

A42.3 http://cpr.att.com/pdf/al/g042.pdf (pg 24) http://cpr.att.com/pdf/fi/g042.pdf (pg 40) Intrastate only FL: cable and other competitors cover approximately 97% of all business locations. AL: cable and other competitors cover approximately 56% of business locations.

Jurisdiction

IP Replacement	Description See Appendic for Full Description and Benefits	Function & Features	Coverage
IP Flexible Reach	AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by	Comparable to legacy service
	inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	customers phone sets.	

# Product Profile: Basic Rate ISDN (BRI)

scription

 Customer Count
 AL
 FL

 Retail
 Image: Count of the second of

Competitive

Alternatives

business locations.

**Jurisdiction** 

	Guidebool
ISDN - Business Service (IBS) supports simultaneous transmission of voice, data, and packet services on the same exchange access line. Calling/Called Number Delivery, Calling Name Delivery, and Call Hold are included with this service. IBS provides a method of access to the telephone network called Basic Rate Access. Basic Rate Access consists of the ability to access up to two 64 Kbps (B) channels and one 16 Kbps (D) channel at the service delivery point. IBS is provided through Basic Rate Access. Features are available to increase the capability of the Bearer Alternative Service and may be subscribed to on an as-needed basis B channel circuit switched services offer up to 64 Kbps intra-office transmission of voice or data. This option permits the customer to utilize either circuit voice or data transmission paths on a per call selection basis. Transmission on the B channel will be circuit switched at 64 Kbps within the switch and/or equipped facilities between ISDN compatible central offices.	A42.1 http://cpr.att.c pdf/al/g042.pd (pg 1) http://cpr.att.c pdf/fl/g042.pd 1)

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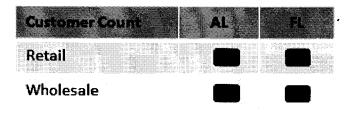
Tariff/

FL - 100% of customers have a minimum of 2 cable and other competitors. The customers are also included in the 97% of all business living units which have at least one cable or other competitor AL: cable and other competitors cover approximately 56% of

IP Replacement	Description See Appendix for Full Description and Benefits	Function & Features	Coverage
Business DSL Internet – Broadband service option (IPDSL/vDSL)	AT&T Business DSL Internet Service is a high speed Internet service for enterprise customers.	Business DSL can provide data access for multiple devices (equivalent of 2 data ISDN lines).	Approximately 49% of the Business locations in AL and 39% in FL
U-verse High Speed Internet Business Edition	U-verse allows simultaneous voice and data on the same line	With the addition of U-verse voice, capabilities are comparable to ISDN.	Approximately 49% of the Business locations in AL and 39% in FL



### Product Profile: Centrex



urisdiction

Intrastate only

### Tariff / Guidebook

A Central Office hosted phone service with user interface, built in redundancy, and 24 hour monitoring and maintenance.

ription

(AL) A12.25 http://cpr.att.com/pdf/al/g012.pdf (pg45)

(FL) A12.25 http://cpr.web.att.com/pdf/fi/g012.pdf(pg 12) FL - approximately 21% of customers do not have a cable or other competitor. The remaining 79% have 2 or more competitors. The customers are also included in the 97% of all business locations which have at least one cable or other competitor.

**Competitive Alternative** 

IP Replacement	Description See Appendix for Full Description and Benefits	Function & Features	Coverage
IP Flexible Reach	AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers' phone sets.	Comparable to legacy service
VDNA-E	AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)- based communications solution.		
Office@Hand	A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free		

### Your submission has been accepted

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