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VIA ELECTRONIC FILING

Ms. Jocelyn Boyd, Chief Clerk/Administrator
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**Re: Competitive Carriers of the South, Inc. – *Ex Parte* Briefing
October 22, 2015 Regarding Telecommunications Transition
ND-2015-27-C**

Dear Jocelyn:

On behalf of the Competitive Carriers of the South, Inc. (“CompSouth”) please find the enclosed list of IP Transition – Technical and Operational Questions requested by Commissioner Hamilton during the CompSouth *ex parte* briefing held October 22, 2015. Should you have any questions, please contact me.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

Bonnie D. Shealy

/bds
Enclosure

cc/enc: Ms. Carolyn Ridley (via email)
Jeffrey M. Nelson, Chief Counsel and Director of Legal Services (via email)

IP Transition – Technical and Operational Questions

- In order to complete the IP Transition, will the circuit switches have to be replaced with IP switches? If so, when will the circuit switches be decommissioned in South Carolina (ATT has approximately 127 circuit switches in SC alone)? What is the process for the decommissioning of a switch? What is the impact on end users? What is the impact on other carriers?
- ATT filed an ex parte with the FCC on 10/30/2015 regarding its plans to grandfather certain services as part of its Technology Trials in FL and AL. What are the price differentials between the grandfathered services and the IP replacement services? Does ATT have any additional information regarding the status of the IP Trials? What learnings have come out of the trials to date? When does ATT expect those trials to conclude?
- What is ATT's position regarding its UNE obligations in the IP world given that the UNE obligations are technology agnostic?
- Has ATT filed all of its IP voice Interconnection agreements with other carriers or with its subsidiaries for approval by the SC PSC?
- How will public safety concerns be addressed in the transition? Specifically, how will Disaster Recovery Plans be handled? Will Telephone Restoration Priority still be honored for critical services for agencies and public safety purposes? What is the Commission role after the transition in addressing post-disaster service recovery? What will be reported to the PSC and carrier customers? What will be the PSC role after the transition with respect to Public Safety Groups, 911, and other emergency/security agencies?
- What impact will the transition have on consumers and businesses using third party devices/services (such as fax machines, credit card readers, medical alert systems, monitoring/alarm systems, etc.)? What impact will the transition have on local, state and federal agencies and their systems, such as the FAA traffic control?
- How will carrier relationships be managed in the transition of services to new technology and how will that impact the carriers' end use customers? For the carrier-customers, will intervals, ordering, maintenance, etc. be the same as before or different? If different, how different? What is the PSC's role in addressing the competitive impacts of the change? Will performance be quantified and reported? If so, how?
- How specifically will the transition impact the small and rural carriers and their ability to interconnect with larger ILECs? Will those small and rural carriers see an increase or decrease in their cost for interconnection? If so, what will be the magnitude? Will traffic exchanged with small and rural carriers be treated differently than it is today? If so, how?
- When systems and processes are being developed to ensure customers can obtain reasonably comparable services on the new technology platform, how will existing processes and systems be coordinated? As new systems and processes are being developed, will AT&T use the Accessible Letter and Change Control Forums to ensure customers know how to use these new systems and processes?
- There are several technologies and industries that rely on copper (e.g., security alarm, Machine to Machine). How will the transition impact this industry and need for copper? What affirmative steps is AT&T taking to minimize impact on industries or services that rely on copper as a key component of their services? Will AT&T have products in the IP network that have copper components?