



**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL**

THE ENERGY & TECHNOLOGY COMMITTEE

Senate Bill 179: AAC REQUIRING CONTINUAL 9-1-1 SERVICE

February 23, 2010

TESTIMONY OF COMMISSIONER ANTHONY PALERMINO

The Department of Public Utility Control (Department) does not support Senate Bill No. 179. Senate Bill No. 179 would require that any telephone company or certified local exchange company (CLEC) terminating telecommunications service for nonpayment shall continue to provide access to emergency services.

The Department does not support this proposed bill for the reasons outlined below. The practical affect of this proposal targets only those companies offering local service over a circuit switched-based platform and would exclude those providers offering service over a Voice over the Internet Protocol- (VoIP) based platform. Since Title 16 does not provide the Department with jurisdiction over VoIP service providers, CLECs employing a VoIP platform such as Comcast, Cablevision and Charter would be exempt from this statute. This could also be problematic and confusing to subscribers since AT&T Connecticut and Verizon also offer VoIP-based local service (through their U-Verse and FiOS products respectively). In particular, AT&T and Verizon would be exempt from providing 9-1-1 access to U-Verse and FiOS local service customers, while being required to provide 9-1-1 access to their traditionally-based local service customers.

Also, once a customer's line is terminated, the provisioning of 9-1-1 services would require the local service providers to maintain the access line and incur administrative and technical costs to provide for 9-1-1 service only for that customer. These costs could then be the responsibility of the companies' shareholders or passed on to the companies other customers.

In addition, since there is no ending date by which access to emergency services must be provided, such a requirement would result in an efficient use of telephone numbering resources that may require the premature introduction of new area codes in Connecticut. Lastly, this protection is unwarranted in today's world where so many households also have cell phones which can dial 9-1-1 during an emergency situation.

Therefore, the Department cannot support the proposed bill for its discriminatory impact and the additional costs to Connecticut residential and business telecommunications service customers that would result if this bill were to become law.

The Department thanks the Committee for the opportunity to testify on this bill.

Ten Franklin Square • New Britain, Connecticut 06051 • Phone: 860-827-1553 • Fax:
860-827-2613

Email: dpucexecutivesecretary@po.state.ct.us • Internet: www.state.ct.us/dpuc

Affirmative Action/Equal Opportunity Employer