

**State of Connecticut
Office Of Consumer Counsel**

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OCC Testimony

RB 6401 "AAC Video And Cable Providers"

Connecticut General Assembly

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The Office of Consumer Counsel (OCC) believes that RB 6401 "AAC Video And Cable Providers" is an attempt to tie the hands of PURA at a time when there are many concerns about service quality in light of the recent storms and restoration efforts, as well as federal actions that may dramatically revise the transition of today's wireline telephone services into VoIP services.

Thus, this bill is premature in light of AT&T's Petition filed with the FCC just last November, outlining their plans to "clear away the regulatory

underbrush" governing the company's older landline and DSL networks.¹ AT&T asked the FCC to oversee tests of how traditional landline infrastructure can be replaced with newer technologies, such as Internet-based landline service and high-speed wireless networks, letting customers leave for other providers such as cable companies, so that the incumbents can focus their resources on wireless and broadband services. The FCC has accepted AT&T's idea for testing a transition process and that docket is proceeding apace in Washington, D.C.

The state's General Assembly would best serve the state's consumers by allowing that FCC proceeding to thoroughly examine the issues presented by this bill, authored by the state's two telephone companies, and implement procedures to deliberately transition the nation's telephone system from its legacy systems to one Internet-protocol based, as requested by AT&T. Clearly, a national solution, requested by the proponent of this proposed state legislation, will be preferable to 50 states each enacting their own piecemeal versions of a transition plan.

As noted above, the cable companies' VoIP telephone services are a clear beneficiary of the AT&T Petition to the FCC since many existing landline customers will not jump to wireless services or a high speed Internet connection for their basic telephone needs. While the cable operators generally require the purchase of bundles with their entertainment packages, they may be recognize a marketing opportunity when the telephone companies abandon landline basic telephone and provide alternatives, at least for a number of years.

Strong service quality standards are essential to assure residents and businesses, and communities, that the telephone companies are keeping their equipment up to the highest marks at all times. There is no reason for the General Assembly to eliminate existing service quality standards for this service, nor for it to create a wall around PURA preventing it from reevaluating VoIP service quality as conditions in the Connecticut market evolve due to inevitable regulatory and technology changes.

¹ AT&T *Petition to Launch a Proceeding Concerning the TDM-to-IP Transition* (filed Nov. 7, 2012) (AT&T Petition)
http://www.att.com/Common/about_us/files/pdf/fcc_filing.pdf