



INTERGOVERNMENTAL ADVISORY COMMITTEE
TO THE
FEDERAL COMMUNICATIONS COMMISSION
ADVISORY RECOMMENDATION NUMBER 2013 – 7

Regarding Application of Verizon New Jersey Inc. and Verizon New York Inc. To Discontinue
Domestic Telecommunications Services
WC Docket No. 13-150
Comp. Pol. File No. 1115

The Intergovernmental Advisory Committee (IAC) considers the proposed changes to the Verizon landline service on Fire Island as a precursor to Verizon and other traditional telecommunications providers transitioning from copper wire legacy systems to next generation communications technologies. *See*

http://transition.fcc.gov/Daily_Releases/Daily_Business/2013/db0628/DA-13-1475A1.pdf

Accordingly, we believe that the Commission should consider larger issues prior to its decision whether or not to grant permanent approval for Verizon's requested transition because it may set the precedent for similar transition-related applications that may be filed.

First, we believe the Commission should specify what constitutes basic telecommunications/information service to consumers. This new definition of basic service should align with the minimum telecommunication services consumers must or should have. Such specifications should address the myriad capabilities currently available through the legacy system (e.g., voice, data, fax, medical alert, E-911 and next generation E-911, security alarm, and other services).

Second, under current authorizations, wireless and broadband services are not generally subject to state regulatory oversight, but are solely under the purview of the Commission. As the transition from legacy to next generation communications systems accelerates, the Commission will be inundated with customer filings regarding real or imagined grievances. Based on the number of complaints currently filed at the state and FCC levels, removing all state jurisdiction

will likely result in Commission staff and Commissioners being sorely pressed to address the volume of complaints filed.

A system, implemented now by the Commission in connection with the Verizon Fire Island docket, that authorizes state regulatory agencies to continue addressing some customer complaints will result in a more expeditious resolution of the complaints, recognizes that consumers of communications services naturally turn to state and local officials for assistance, and will prevent a potentially unmanageable work load on Commission staff and Commissioners.

Among the subject areas that might be remanded to state officials are those related to quality of service, availability of appropriate alternative providers and technologies, and issues related to auxiliary telecommunications services (e.g., medical alerts). State officials could be authorized to address those subjects specifically cited by the Commissioners (in the same manner they do today for “traditional” telecommunications service providers/customers) with the FCC addressing those subjects for which it retains jurisdiction.

The objective is to maintain consumer protections at both the Federal and State levels in a manner that does not create an undue burden on consumers, state and FCC regulators and staff, as well as expedites communications companies addressing identified problems.

Third, as suggested above, the IAC encourages the Commission to consider this filing by Verizon as an example of the initial transition from the legacy telecommunications system to a next generation IP-based network system. We therefore encourage the Commission to use its review of Verizon’s petition as an opportunity to address the broader technology transition issues by establishing the consumer protection rules and procedures defining relations between customers, communications providers, state/local/tribal governments, and the Commission in the technology transition ahead. *See also* IAC Recommendation 2013-3, “Technological Transition from Legacy Copper Wire Infrastructure to Newer Technologies,” adopted January 8, 2013, [Recommendations](#), and IAC Recommendation 2013-5, “Response to Technology Transitions Task Force Request for Comments on Potential Trials of Transitions to Internet Protocol(IP)-Based Networks,” adopted July 8, 2013, [Recommendations](#).

Agreed on this 29th day of July, 2013.

INTERGOVERNMENTAL ADVISORY COMMITTEE

Joyce Dickerson, Chair