



INTERGOVERNMENTAL ADVISORY COMMITTEE

to the

FEDERAL COMMUNICATIONS COMMISSION

RECOMMENDATION 2015-8:

SUPPLEMENT TO ADVISORY RECOMMENDATION No: 2015-5

In the Matter of Technology Transitions; GN Docket No. 13-5, Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; Special Access for Price Cap Local Exchange Carriers; WC Docket No. 05-25, AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services; RM- 10593

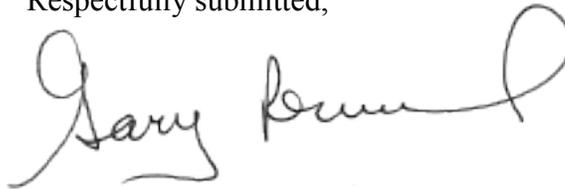
The Intergovernmental Advisory Committee ("IAC") to the Federal Communications Commission ("Commission") submits this clarification regarding previously submitted comments in the above referenced NPRM addressing the IP transition.

The IAC, pursuant to paragraph 79 in the NPRM, recommends state, local and tribal governments receive written notice of technology transitions directly from carriers well in advance of any technology transition. With this information, local governments can be prepared for calls and emails regarding the transitions and can assist in education efforts, as required. Governments may need to prepare staff for such events or at the very least prepare briefing information for those fielding calls and emails from the public. This is, in some cases, a public safety matter for citizens that rely on certain forms of infrastructure for security and healthcare systems. Direct information about transitions

from carriers will assist state, local and tribal governments with holistic infrastructure planning for our communities. For example, it is critical that adequate power sources be available for fiber networks. If local governments don't know where the planned changes will occur, or where they already are occurring, we cannot assist in planning for a robust, resilient system. Finally, the notice to state, local and tribal governments should be direct. It is unreasonable for communities to be expected to monitor the Daily Digest or carrier websites for information about transitions. Dedicating valuable staffing resources to patrol websites in the hopes of gleaning more information about planned changes is outside the reach of local governments on limited budgets.

Thank you for this opportunity to provide this clarification.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary Resnick". The signature is fluid and cursive, with a large loop at the end.

Mayor Gary Resnick, Chair of the IAC

June 25, 2015