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COMPTEL Introduces Competitive Amendment to ILECs’ ABC Plan on Intercarrier Compensation Reform

COMPTEL Urges FCC to Promote Deployment of Next-Gen IP Networks

WASHINGTON, D.C. – COMPTEL, the leading trade association for the competitive communications industry, today in comments to the Federal Communications Commission on universal service and intercarrier compensation (ICC) reform introduced a Competitive Amendment to the ILECs’ ABC Plan released in July. COMPTEL’s Competitive Amendment provides a framework to reform ICC in a manner that supports the FCC’s articulated objectives of promoting deployment of broadband and IP technology while meeting requirements of the Communications Act of 1934.

“The ILECs’ proposal [also known as the ABC Plan] does nothing to promote deployment of next-generation IP networks because it further entrenches the greatest obstacle to such deployment: The refusal by most ILECs to negotiate interconnection agreements that comply with the critical competitive protections of Section 251 and 252 of the Act,” COMPTEL’s comments noted. “The ABC plan is designed to perpetuate and protect ILEC revenues, while dramatically reducing competitors’ revenues and denying competitors access to cost-based transport as required by law. In contrast, the Competitive Amendment provides a framework that addresses the needs of the industry as a whole.”

COMPTEL’s Competitive Amendment specifically seeks, among other changes, to:

- **Remove Uncertainty Regarding IP-to-IP Interconnection** – Since the circuit-switched architecture of today’s PSTN will ultimately be replaced with an IP architecture, it is vital that nondiscriminatory, cost-based IP interconnection agreements must replace the circuit-switched interconnection agreements that underlie today’s PSTN so that the transition to an IP-based PSTN will be seamless. Modifications to the intercarrier compensation regime to facilitate an IP environment should also make clear that the basic legal framework for seamless interconnection – i.e., the competitive protections of Sections 251/252 – applies in a technology neutral manner. Addressing compensation without enforcing the appropriate legal framework will do nothing to promote a ubiquitous competitive broadband environment.

- **Ensure Cost-Based Rates for All Transport as well as Termination** – The COMPTEL Competitive Amendment would ensure reforms comply with the statutory mandate that all
transport and termination rates for traffic under section 251(b)(5) be cost-based. Irrespective of their previous labels as interstate access, intrastate access, local, VoIP or any other categorization, all calls should be considered under the provisions of Section 255(b)(5) and the associated pricing regulations under 252(d)(2) should be applied with equal force to all transport and termination.

For COMPTEL’s comments to the FCC on universal service and intercarrier compensation reform, click here.

To view the COMPTEL Competitive Amendment, click here.

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About COMPTEL
Based in Washington, D.C., COMPTEL is the leading industry association representing competitive communications service providers and their supplier partners. COMPTEL members are entrepreneurial companies driving technological innovation and creating economic growth through competitive voice, video, and data offerings and the development and deployment of next-generation, IP-based networks and services. COMPTEL advances its members’ interests through trade shows, networking, education, and policy advocacy before Congress, the Federal Communications Commission and the courts. COMPTEL works to ensure that competitive communications providers can continue to offer lower prices, better service, and greater innovation to consumers. For more information, visit www.comptel.org.