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**FOR IMMEDIATE RELEASE**

April 2, 2014

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**COMPTTEL Proposes Managerial Framework to Successfully  
Guide the Technology Transitions**

***Key Steps Address Relevant, Longstanding Legal and Policy Issues that  
Will Promote Robust Competition, Innovation and Investment in  
Business Voice and Broadband Services***

**WASHINGTON, DC** – COMPTTEL, the leading trade association for the competitive communications industry, today submitted to the Federal Communications Commission (FCC) a proposed managerial framework that outlines the steps that must be taken during the next year to guarantee the success of the ongoing technology transitions and ensure that American businesses can continue to receive innovative voice and broadband services from their preferred providers. This framework would be complementary to the various technology transition trials that have been proposed.

The managerial framework draws on key recommendations in the Commission's 2010 National Broadband Plan, which recognized the critical role that last-mile access and interconnection policies play in ensuring retail business competition. The plan specified actions that would ensure widespread availability of wholesale inputs that all carriers could use to deliver broadband to small businesses, mobile providers and enterprise customers; guarantee just and reasonable rates, terms and conditions for TDM- and packet-based special access services; clarify the rights and obligations with regard to IP interconnection; and provide a balance in copper retirement policies.

"The Commission is to be applauded for its focus on ensuring that competition, consumer protection and other key values endure as it addresses the transition from legacy to more innovative technologies. However, in the four years since the National Broadband Plan was introduced, several key issues that are central to the success of the technology transitions still remain unresolved," said Chip Pickering, COMPTTEL's CEO. "COMPTTEL's proposed managerial framework sets a clear timeline for addressing last-mile access and IP interconnection issues that are critical for competition to flourish, and provides the certainty, predictability, timeliness and transparency to the process so that the Commission can achieve the robust competition envisioned by its National Broadband Plan."

COMPTTEL's managerial framework proposes a specific timeline of Commission actions:

**Second Quarter of 2014**

- Initiate Special Access Data Collection – While the FCC has ample evidence on the record to proceed with comprehensive reforms, the Wireline Competition Bureau should begin as soon as possible the process of gathering data it deems necessary as requested in the FCC's special access information collection order, for which approval is currently pending at the Office of Management and Budget.
- Reverse Prior Grants of Forbearance from Dominant Carrier Regulation – The FCC should take actions it deems necessary to begin the process of reconsidering the prior grants of forbearance from the treatment of certain ILECs as dominant carriers in their provision of packet-based special access services.

### **Third Quarter of 2014**

- Address ILECs' Anti-Competitive, Exclusionary Special Access Discount Plans – The FCC should take action to prohibit and, thereby, prevent the harmful effects of the ILECs' exclusionary, lock-up special access discount plans. These plans have hindered competitive carriers' ability to migrate to more innovative services and construct their own last-mile connections to businesses.
- Adopt Rules Addressing Copper Retirement – The Commission should update its copper retirement rules to ensure the public interest is being served prior to the removal or disabling of copper facilities that have been used to provide innovative and affordable broadband services to small and medium size businesses.

### **Fourth Quarter of 2014**

- Clarify Duty of ILECs to Provide IP Interconnection – As soon as possible, but no later than the fourth quarter of 2014, the FCC needs to confirm carriers' rights to IP interconnection for the exchange of facilities-based voice traffic under Section 251 of the Act, so that consumers can finally enjoy the benefits of this innovative service.

### **Second Quarter of 2015**

- Undertake Comprehensive Special Access Reform – Once the FCC has identified, through its analysis of collected data, the relevant product and geographic markets in which the ILECs have market power in the provision of TDM-based and packet-based services, it should move quickly to adopt comprehensive reforms of the rates, terms, and conditions for these services in the markets where ILECs have market power.
- Address Access to Packet-Based Last-Mile Facilities – Throughout this process the Commission should consider additional actions to address competitive carriers inability to obtain access to last-mile facilities, including packet-based facilities, on just and reasonable rates, terms, and conditions, that could be taken without conducting an extensive mandatory information collection.

To view the full [managerial framework proposal](#), 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](http://www.comptel.org).