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**COMPTEL and Service Providers Urge FCC
Not to Approve AT&T's Technology Transitions Experiments
Without Significant Modifications**

***Proposed Wire Centers Will Not Provide Sufficient Data on Impact of
IP Transition on Residential, Business and Wholesale Consumers***

WASHINGTON, DC – COMPTEL, the leading trade association for the competitive communications industry, today joined with service providers Cbeyond Communications, LLC, Integra Telecom, Inc., Level 3 Communications, LLC, and tw telecom inc. to urge the Federal Communications Commission not to approve AT&T's proposed technology transitions experiments in Carbon Hill, Ala., and Kings Point, Palm Beach County, Fla. without significant modifications. In a letter filed at the Commission, they noted AT&T's proposal lacks critical information needed to conduct a meaningful review and, because of the specific wire centers targeted, the experiments will not generate the type of data necessary to fully understand the impact of the TDM-to-IP transition on residential, business and wholesale customers.

"In its own comments about service-based experiments proposed by other parties, AT&T noted that the FCC shouldn't move forward unless the applicant can provide sufficient information to determine whether the experiment 'ensures universal connectivity, consumer protection, public safety, reliability and competition' and 'will indeed provide the Commission with useful information concerning the IP transition,'" said Angie Kronenberg, chief advocate and general counsel at COMPTEL. "We agree, and, in this case, believe that AT&T has not provided the evidence necessary to show that its trials will provide the needed insight into how the natural evolution to IP technology will address the needs of wholesale customers, as well as retail consumer and business users."

Of concern to COMPTEL and the service providers is the lack of detail about the replacement services AT&T will be make available to wholesale customers during the experiment and the timeline for enhancements to the replacement voice services that will be made available to residential and business customers. Additionally, they noted that the proposal does not provide any information about the rates, terms and conditions on which replacement services will be offered to wholesale customers during the experiment as required by the Commission's January Order.

Without these important details, the commenters noted that AT&T's proposal "precludes wholesale customers from conducting the business planning necessary to serve their retail

customers, including small and medium-sized businesses. It also fails to ensure that, consistent with the *Experiments Order*, packet-based replacement inputs will be offered at rates, terms, and conditions equivalent to those currently offered for TDM-based unbundled network elements and special access services.”

The comments provided by COMPTEL and the service providers include a declaration by Joseph Lenski of Edison Media Research Inc., who evaluated AT&T’s proposal based on the basic tenets of experimental design and offered recommendations on how the experiments should be altered to ensure that reliable and statistically significant information is attained.

Lenski explained that AT&T’s proposed experiment is unlikely to generate accurate and meaningful data because it does not include wire centers that encompass sufficiently diverse geographic areas, customer types, population densities and demographics, and climates; nor do they provide sufficient information on the types of data to be collected, the metrics to be used, or the control groups to be selected.

To ensure that significant information results from the experiments, Lenski recommended that AT&T refine its proposal to ensure it is using appropriate procedures to select test wire centers that are statistically representative and define a control group via random selection. He also stated that AT&T must identify the types of data to be collected – including data on wholesale service quality, such as ordering, provisioning, maintenance, and repair intervals – and obtain independent third-party verification of the data collected.

The full [letter](#) filed by COMPTEL, Cbeyond, Integra Telecom, Level 3 and tw telecom can be found on the [COMPTEL website](#).

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.