











July 8, 2015

Chairman Tom Wheeler Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Notice of Ex Parte Submission, GN Docket No. 13-5, Technology Transitions;

GN Docket No. 12-353, AT&T Petition to Launch a Proceeding Concerning

the TDM-to-IP Transition.

Dear Chairman Wheeler:

The undersigned associations urge you to move forward expeditiously with adopting an Order in the Technology Transitions proceeding that will protect and promote competition, universal service, and public safety, ensuring that all consumers whether they are residential or business will continue to obtain the services they need as the nation's telecommunications networks move to all IP.

As you are well aware, the transition to IP is just one of the most recent evolutions in a long history of changes to the nation's telecommunications networks. Prior transitions, such as analog to digital, yielded substantial benefits for residential and business users alike – from a technical standpoint the IP transition should likewise yield substantial benefits. But the Commission must take action to ensure that network users are better off as a result of technological advances. All users should have more meaningful choices among communications service providers, and more reliable, affordable, and innovative offerings available to them. This is important for the whole ecosystem of broadband content, services, and apps that are made available over the networks. The more communications service provider competitors there are in the marketplace, the more opportunities end users will have to reach the content, services and apps they need at home and to operate and grow their businesses.

We commend the FCC's efforts to promote more competitive choices for residential and business broadband service. As technology transitions and more services move to IP based solutions, we encourage you to protect the wholesale access market so that competitive telecommunications companies can continue to maintain access to reach their end users.

By keeping the marketplace open for more competition, the FCC will help ensure that competition will flourish, promoting the availability of competitive choice so that our members will have multiple paths to conduct their businesses and serve their customers.

Sincerely,

/s/ Aryeh Fishman Associate General Counsel, Regulatory Legal Affairs Edison Electric Institute /s/ Lyle Beckwith SVP, Government Relations National Association of Convenience Stores

/s/ R. Timothy Columbus Counsel SIGMA /s/ Louis T. Fiore Chairman Alarm Industry Communications Committee

/s/ Evan Engstrom Policy Director Engine /s/ Lauren Culbertson Executive Director Internet Freedom Business Alliance

/s/ Karen Reidy VP, Regulatory Affairs COMPTEL

cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Jonathan Sallet
Matthew DelNero
Howard Symons