Background

• The FCC is monitoring the technological transition of America’s phone system from the traditional (TDM) system to an IP-based network. Public Knowledge believes this transition must be handled responsibly and should be guided by five fundamental principles: (1) Service to all Americans, (2) interconnection and competition, (3) consumer protection, (4) network reliability, and (5) public safety. These fundamentals are pillars of America’s social contract with the telephone network over the last century and it is essential that they continue to guide the next generation technology of our nation’s phone system.

• In October 2012, Hurricane Sandy destroyed huge portions of Verizon’s landline network in certain locations. Verizon has since made it clear it does not want or intend to rebuild its traditional copper network. Additionally, in several communities (like Fire Island, NY), Verizon has decided not to install fiber and instead plans to deploy a cheaper, more limited wireless alternative called Voice Link.

Why Not Copper, and Why Voice Link?

• Verizon looks to reap large savings by eliminating its copper-to-the-home service. That’s understandable. However, FiOS, Verizon’s fiber service is also expensive to deploy, which is why Verizon stopped deploying it. Verizon’s solution is to deploy a new fixed wireless product called Voice Link.

What is Voice Link?

• Voice Link is a wireless service but is different from the technology in a Verizon Wireless cell phone. There is no mobile service and no Internet access with it.

• Voice Link is a product untested in the real world
  o Businesses that previously relied on Verizon’s copper network cannot use Voice Link to process credit card payments, receive faxes, or handle other e-transactions that relied on the old copper network.
  o Verizon disclaims liability if its wireless network gets congested and emergency 911 calls do not go through.
  o Voice Link is not powered through the line like copper-based phone service. In the event of a power outage its rechargeable battery only has 36 hours of standby time or 2.5 hours of talk time.
  o Voice Link does not allow customers to use calling cards or receive collect calls.
  o Without an Internet connection, services for customers with hearing disabilities like Video Relay Service (VRS) will not be able to function.

Why is This So Important?

• Disaster victims shouldn’t be guinea pigs for new technologies
  o While FiOS is an established technology, Voice Link is untested – unsure of what problems might arise or how to solve them if they do arise.
  o Unanswered questions for subscribers with hearing disabilities, customers with loved ones abroad or incarcerated, and small businesses. Will they have access to traditional services or will they have to buy new equipment? Will Verizon cover the cost of the new equipment?

• People should not be worse off after rebuilding a phone system
  o For the first time in 100 years, copper lines have come down and are not replaced with an equal or better system
  o We should not throw people under the bus or send them searching for expensive alternatives

• The FCC must issue a rule or policy statement defining the process for what happens going forward after a natural disaster.