**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the Matter of | |
| Restoring Internet Freedom | WC Docket No. 17-108 |
| Bridging the Digital Divide for Low-Income Consumers | WC Docket No. 17-287 |
| Lifeline and Link Up Reform and Modernization | WC Docket No. 11-42 |

**WRITTEN EX PARTE OF PUBLIC KNOWLEDGE, COMMUNICATIONS WORKERS OF AMERICA, NEXT CENTURY CITIES NATIONAL DIGITAL INCLUSION ALLIANCE, COMMON CAUSE, AND THE GREENLINING INSTITUTE**

Date: October 14, 2020

Recently, AT&T announced that it would phase out its DSL broadband offering.[1] AT&T did not, however, commit to replacing DSL with a wireline connection of equal or superior quality outside AT&T's "fiber footprint."[2] While AT&T has not stated so publicly, the attached internal document obtained by Communications Workers of America (CWA) shows that AT&T's

[1] *See Jon Brodkin, AT&T Kills DSL, Leaves Tens of Millions of Homes Without Fiber Internet, arstechnica (Oct. 5, 2020), https://arstechnica.com/tech-policy/2020/10/life-in-atts-slow-lane-millions-left-without-fiber-as-company-kills-dsl/.*

[2] It is important to understand AT&T's terminology here. As explained by AT&T in the documents attached and on its website (cite) AT&T's "fiber footprint" does not mean that all homes have fiber-to-the-home (FTTH), nor does AT&T commit to providing them FTTH in the future. It includes AT&T's fiber-to-the-curb footprint, which supports AT&T's hybrid ADSL product. Accordingly, AT&T's commitment to transferring customers from its existing DSL network to its fiber footprint is not a promise of an upgrade from copper to FTTH.

planned phase out will leave some unknown number of DSL subscribers without an available terrestrial, fixed broadband to the home option.[3]

This directly undercuts the primary rationale of the draft *Order*[4] in the above captioned broadband classification and Lifeline proceedings. In the draft Order, the Commission states multiple times that reclassification of broadband as Title I will facilitate deployment and service to all Americans, particularly rural Americans and poor Americans. But this policy of deregulation leaves the Commission powerless to address the widespread elimination of critical broadband in a time of national pandemic and the worst forest fire season in U.S. history. Additionally, and contrary to the draft *Order*, the FCC's attempts to preempt state regulation of broadband muddy the waters and inhibit the ability of the states to protect subscribers from disconnection. In *Charter Advanced Services v. Lange*, 903 F.3d 715 (8th Cir. 2018), the Commission's General Counsel represented to the 8th Circuit that IP based "voice service" is an interstate information service[5] and therefore exclusively regulated by the FCC. *Id.* at 719 note 4. The 8th Circuit found that Minnesota's efforts to protect subscribers in the manner predicted by the draft *Order* (and as California and other states may seek to do as AT&T and other providers

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[3] As the Commission has consistently held, neither mobile broadband nor satellite offers equivalent service to wireline or fixed wireless broadband service. *2020 Broadband Report* at ¶ 12. https://docs.fcc.gov/public/attachments/FCC-20-50A1.pdf

[4] *See Restoring Internet Freedom*, *Bridging the Digital Divide for Low-Income Consumers*, *Lifeline and Link Up Reform and Modernization*, WC Docket Nos. 17-018, 17-287, 11-42, Order on Remand, FCC-CIRC2010-01 (Oct. 6, 2020) (hereinafter *Draft Order*).

[5] In 2006, the FCC issued an order requiring interstate providers of fixed VOIP service to contribute to the Universal Service Fund. *See* 21 FCC Rcd 7518 at ¶¶ 34-49 (2006). The Commission relied on the permissive authority of 47 U.S.C. § 254(d) (permitting the FCC to include "other providers of interstate telecommunications" not themselves carriers in the contribution base), and its ancillary authority. *Id. Aff'd sub nom MN PUC v. FCC*, 483 F.3d 570 (8th Cir. 2007). As the Commission acknowledges in the draft *Remand Order*, to ***receive*** Lifeline funds, a carrier must meet the requirements of 47 U.S.C. § 214(e), including actually being a common carrier.

phase out their DSL service) are preempted. While Public Interest filers do not believe that the Commission's preemption claims carry weight after *Mozilla v. FCC*, 940 F.3d 1, 75-86 (D.C. Cir. 2019), they do create uncertainty in the states and undermines the efforts on which the draft *Order* relies to protect public safety and Lifeline.

As the Commission itself is forced to acknowledge, public safety depends on maximizing the adoption and use of broadband. The inability of the Commission to address – or even effectively investigate – AT&T's proposed disconnection and leave some unknown customers with no wireline option directly undermines public safety and the draft *Order*'s reasoning. Worse, the number of disconnected DSL subscribers with no fixed terrestrial alternative will likely grow into the millions as AT&T and other DSL carriers phase out DSL. The Chairman should withdraw the draft *Order* from circulation as contrary to plain fact and as directly endangering hundreds of thousands, if not millions, future disconnected DSL subscribers.

**A. The AT&T Documents**

Public Interest Commenters (PIC) submit a memo from AT&T's highest levels of technical management[6] to all technicians who do home installation, network maintenance, central office work, and their managers. (This document is referred to hereafter as "the AT&T Memo"). The AT&T Memo informs all AT&T technicians that over time AT&T will discontinue DSL service to customers. Technicians are advised to remove the attached copper line unless (a) the subscriber has plain old telephone service (POTS), aka Title II TDM legacy service covered by the Commission's Tech Transition rules;[7] and, (b) the customer refuses to give up their POTS

[6] The points of contact on the memo are: Warren Cureton - Senior Technical/Quality management, Robert Jindra - Senior Network Process Quality and Bernie Terrell - Senior Network Process Quality Mgr.

[7] *See* 47 C.F.R. § 63.71.

service. In that case, technicians are instructed to leave the line connected and POTS service intact. The AT&T Memo instructs technicians to offer customers capable of receiving "IPDSL or ADSL"[8] of the opportunity to migrate to these services at the same cost as their current DSL subscription, but the customer must call their AT&T sales office to get details of the offer.

Importantly, the memo informs technicians that some unknown number of customers will have no terrestrial broadband alternative. In that case, they can call the AT&T sales office and request connection to "a wireless internet offer that will be available to them." The AT&T memo provides no details as to the nature of this "wireless internet service," its capabilities, or when it will be available. The memo section on DSL concludes that customers may continue to use their DSL connection in the short term, but cannot make any changes to the existing service other than disconnecting DSL and replacing it with an available alternative.

Additionally, Public Interest Commenters attach a letter from AT&T Assistant Vice President for Regulatory Affairs to the President of the California Public Utilities Commission (CPUC). The letter assures the CPUC that DSL customers outside AT&T's fiber footprint may continue their service uninterrupted (without mention of future plans to discontinue the DSL network entirely). It also states that beginning October 1, 2020 AT&T will offer DSL customers "AT&T Wireless Home Internet (AWI)." Although the letter assures the CPUC that AWI provides "equivalent or better service than ATM-based DSL," AT&T does not submit any technical or test data that would allow the CPUC (or anyone else) to verify this claim.

[8] The AT&T Memo refers to 3 types of DSL: IPDSL, ADSL and DSL. From context, it appears that IPDSL and ADSL are short-hand for any fiber supported DSL product, whereas DSL refers to the service to be discontinued.

**B. Relevance to the RIFO Analysis of Public Safety.**

PIC do not file this *ex parte* to contest AT&T's DSL disconnection policy. Rather, PIC file this *ex parte* to demonstrate the failure of the draft *Remand Order* to address one of several flaws in the Commission's reasoning. In making its finding that reclassification and elimination of the rules will not harm public safety, the Commission focuses strictly on the question of prioritization of service. But the reclassification of broadband as a Title I service (combined with the finding in the RIFO that 47 U.S.C. § 1302 does not provide the Commission with any authority over broadband) deprives the Commission of ***all*** oversight authority over broadband. AT&T is free to remove some unknown number of existing DSL connections and replace them with an unknown wireless connection of unknown quality and capacity.

Contrast this with the treatment by AT&T of a customer with Title II POTS service. Because termination of Title II POTS service requires a filing under Section 214(c), and imposes an obligation on AT&T to demonstrate the presence of a new, reliable replacement product, customers enjoy some limited protection for their POTS service. The Commission must be informed of the intent to terminate the Title II service prior to termination. Subscribers must receive notice and an opportunity to protest to the Commission. 47 C.F.R. § 63.71. In some states, Title II providers must also notify some state authority, and possibly obtain permission from a state public utility commission (PUC).

AT&T in the document instructs managers and technicians to leave the line attached and leave the Title II POTS service untouched when deactivating the Title I DSL. Although the letter does not say so explicitly, this difference in treatment between Title I DSL and Title II POTS appears to be a consequence of the greater regulatory protection given to Title II services. See 47 U.S.C. § 214. Because AT&T will not disconnect POTS lines, they have no obligation to notify

the Commission when they disconnect Title I DSL service. AT&T has no obligation to provide an alternative service, and certainly no obligation to demonstrate that its AWI offering will have the same speed or reliability as its current DSL offering.

It is unclear at this time how many customers will lose their existing DSL connection with no wireline alternative available. According to AT&T, 469,000 homes subscribe to their DSL product.[9] Without further investigation by the Commission, it is impossible to know with certainty how many of these households will have no other fixed, terrestrial broadband connection once AT&T shuts off its DSL network. This problem will continue to grow as other legacy providers shut off their legacy DSL networks.

Based on the Commission's Form 477 data, the households most likely to be impacted are the most rural and poorest, making the loss of reliable broadband particularly painful.[10] The ongoing COVID pandemic further aggravates the potential harm when these homes lose their existing DSL connection. Homes will lose access to telemedicine. Students will no longer be able to engage in distance learning. Adults will lose access to the ability to work remotely, and will lose access to important sources of information on COVID. Customers in rural areas on the West Coast will lose access to public safety communications relating to the ongoing wildfires, while those on the Gulf Coast will lose access to important sources of information related to hurricanes and other weather disasters.

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[9] *See* AT&T Inc., Financial and Operational Trends, Q2 2020, page 8. https://investors.att.com/~/media/Files/A/ATT-IR/financial-reports/quarterly-earnings/2020/q2-2020/2q20-trending-schedule.pdf

[10] *See* https://www.digitalinclusion.org/blog/2020/10/05/just-released-atts-digital-redlining-leaving-communities-behind-for-profit/ (analysis of AT&T footprint finding DSL-only households are disproportionately rural and below median income for their region).

As the Commission acknowledges in the draft *Remand Order*, public access to broadband is a critical element of public safety. Because the Commission has classified broadband as a Title I service, the Commission lacks authority to oversee the DSL disconnection process and ensure that these Americans remain connected. Indeed, under Title I, the Commission lacks clear authority even to properly assess the scope of the problem, let alone oversee the DSL disconnections properly. But the draft *Remand Order* does not even consider the public safety impact of this lack of authority and loss of DSL connections to members of the public without reliable alternatives. The draft *Remand Order* limits itself exclusively to consideration of potential harms from net neutrality violations, which constitute only one element of the impact of Title I classification. As the AT&T DSL disconnect program demonstrates, by ignoring the impacts of reclassification beyond the potential dangers of paid prioritization and blocking, the Commission has "entirely failed to consider an important aspect of the problem," *Mozilla*, 940 F.3 at 59 (citing *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.,* 463 U.S. 29, 43, 103 S. Ct. 2856, 77 L. Ed. 2d 443 (1983)).

Again, it is not only AT&T customers that can expect disconnection. As the Commission is well aware, all legacy carriers intend to phase out their existing legacy networks. This inevitable phase out of DSL is not speculative; to the contrary, the Commission has expressly encouraged this phase out as a matter of national policy.[11] But at a time when remaining connected to broadband is a critical public safety concern, the draft *Remand Order* finds that it serves the public interest to disempower the Commission from overseeing the impact of the phase out of DSL on public safety and the public interest.

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[11] *See Accelerating Broadband Deployment by Removing Barriers to Infrastructure Investment*, 32 FCC Rcd 11128 (2017).

### C. As The AT&T Phase Out of DSL Demonstrates, The Other Possible Remedies in the Draft *Order* Are Inadequate to Protect Public Safety.

In the draft *Remand* Order, the Commission once again identifies the same reasons to dismiss the possible harms cited by commenters. Notably, that the FTC can adequately protect consumers through existing antitrust law and Section 5 of the Federal Trade Commission Act, that the weakened disclosure rule adopted by the RIFO provides adequate protection, that "reputational harm" will discipline providers, and that state enforcement of state laws will adequately protect subscribers and therefore public safety. As the AT&T DSL disconnection plan shows, none of these can prevent the single biggest threat to public safety – the loss by subscribers of their one wireline broadband connection.

First, the Commission has purportedly preempted the states from imposing "common carrier" obligations on broadband. Not only has it done so in the RIFO, but it has represented to the 8th Circuit that the Commission finds that the "federal policy" against regulation of broadband that it found in the RIFO preempts state efforts to regulate broadband as a common carrier.[12] But mandating service to all and prohibiting cut off of service absent an adequate substitute are quintessential common carrier regulations. *See Verizon v. FCC*, 740 F.3d 623 (D.C. Cir. 2014). Although PIC do not believe the Commission's preemption claim survives judicial scrutiny under *Mozilla*, the Commission must either explicitly reverse it here or factor it into its analysis.[13] Accepting the claim as true for purposes of the draft *Remand Order*, the Commission's preemption of state power prevents states from mandating broadband service to

[12] *Charter Advanced Services*, 903 F.3d at 719.
[13] Additionally, the Commission's preemption claims apply in the 8th Circuit for the foreseeable future.

all – or that AT&T and other legacy carriers follow the procedures for termination of service consistent with common carrier service.

Nor can the Commission explain how the FTC, or antitrust law, can possibly impact the retirement of DSL and the loss of broadband to the most vulnerable Americans. Nor can the Commission rely on "reputational harm" to prevent the disconnection. The disconnection is already planned. As the AT&T memo shows, AT&T has a set of talking points designed to defend its actions from reputational damage. The Commission cannot pretend that something will not happen when it is, in fact, happening.

Furthermore, all the remedies discussed by the FCC require the harm to occur prior to any official remedy through antitrust or consumer protection law. The draft *Remand Order* acknowledges that, people may well die as a consequence of these harms – such as having their broadband entirely disconnected. Under the draft *Remand Order's* reasoning, the harm must first occur and people need to die before a remedy could be implemented *post hoc*.

We do not count on *post hoc* actions alone to protect the public when the consequences are potentially life threatening. There is a reason we have rules to protect romaine lettuce from infection with *e. coli*, rather than simply relying on state AGs to sue vendors after people have died. The Commission's public safety obligations include affirmatively preventing failures to prevent death or injury, not merely noting that victims and their families may sue for compensation.

Finally, it is worth noting that not only have the threat of the "remedies" cited in the draft *Remand Order* failed to prevent AT&T from planning an unsupervised shut down of its DSL network, they have not prevented other quality of service issues that impact public safety. For example, the Commission's own staff report on hurricane Michael recommends that existing

rules are inadequate to ensure network resiliency and recommends mandatory action.[14] Carriers such as T-Mobile continue to have inexplicable 911 outages.[15] In both these cases, the Commission at least retains the option to impose new rules to remedy the problems revealed in these circumstances. But under the draft *Remand Order*, nothing could be done about similar system-wide failures of broadband.

### D. The Commission Cannot Simply Determine That the Benefits of RIFO Outweigh the Harms Without Considering All Alternatives.

Even if the Commission relies on the expected benefits of Title I classification to balance out the harms, the Commission will still have failed its responsibility on remand to consider other alternatives that would still preserve the FCC's authority to oversee the phase out of DSL and protect customers from losing their only wireline broadband connection. *See DHS v. Regents of California University* 140 S.Ct. 1891, 1915 (2020) (finding that DHS acted arbitrarily when it failed to consider alternatives that would potentially ameliorate the impact of the Attorney General's determination that DACA was unlawful). For example, the FCC could consider the value of Title II classification with broad forbearance. The FCC could reconsider its determinations in the RIFO with regard to its ancillary authority, or its authority from other statutory sources such as Section 706 (codified at 47 U.S.C. § 1302).

At a minimum, the Commission is required to acknowledge that hundreds of thousands of Americans will now lose their existing broadband connection with no evidence that the proposed wireless replacement service is adequate or reliable – and that the Commission is fine with that.

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[14] *October 2018 Hurricane Michael's Impact on Communications: Preparation, Effect, and Recovery*, Public Safety Docket No. 18-339, Report and Recommendations at 23 (PSHSB 2019).
[15] Clare Duffy, *Widespread T-Mobile Outages Cause Issues for Wireless Customers Across the US*, CNN BUSINESS (June 16, 2020), https://www.cnn.com/2020/06/15/business/tmobile-outages-wireless-carriers/index.html.

The Commission is obligated to explain how this new position that loss of rural broadband connections is acceptable despite the clear requirement of Congress to ensure access to broadband for all Americans. The Commission cannot simply insist that it won't happen, when the evidence here shows clearly that it will happen absent Commission action to prevent it.

### E. The AT&T Documents Show the Flaws in the Commission's Lifeline and Poll Attachment Analysis.

The draft *Order* also contains a resolution of the Lifeline rulemaking. The draft *Order* concedes that only common carriers can receive Lifeline support.[16] It proposes that Title I classification will have no impact on Lifeline because (a) as long as carriers have the capacity to offer "voice service" (by which the Commission clearly includes voice as well as POTS) it has the authority to provide Lifeline support (even if the individual customer does not use Lifeline to purchase "voice"); and, (b) if necessary, states can require carriers to offer "voice" on a common carrier basis.[17]

This reasoning has multiple flaws. But PIC commenters focus here simply on the flaws highlighted by the AT&T documents. As the DSL phase out plan demonstrates, the classification of broadband as Title I does not prevent carriers from eliminating the only Lifeline available option by retiring DSL. Again, PIC note that it is not merely AT&T's DSL at issue here. PIC acknowledge that AT&T has essentially ceased participating in the Lifeline program, so the loss of these DSL connections does not necessarily mean a loss to existing Lifeline subscribers. But, as noted above, AT&T is only the first legacy carrier to schedule widespread deactivation of its DSL network. Other legacy providers will follow. This impacts all the existing legacy subscribers who use Lifeline.

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[16] *Draft Order* at 52-53.
[17] *Id.* at 56-58.

The Commission's failure to consider on remand the impact of its classification order on DSL discontinuance violates its responsibility under the statute to ensure that all Americans have access to affordable broadband.[18] As the D.C. Circuit observed when reversing the FCC's previous Lifeline modification to eliminate MVNOs from eligibility, failure to consider the impact of its decision on the loss of available options is arbitrary and capricious. *See Nat'l Lifeline Association v. FCC*, 921 F.3d 1102, 1112-14 (D.C. Cir. 2019) (failure to consider impact of new lifeline limitation that would exclude resellers). Some unknown number of households will lose access as AT&T and other legacy carriers phase out their DSL networks. The Commission must consider the implications of reclassification and its inability even ***to track*** the decline in DSL and its impact on Lifeline subscribers to fulfill its responsibility on remand.

Additionally, the AT&T documents demonstrate the difference between POTS service and "voice" service that the draft *Order* deliberately obscures. The FCC has never classified VOIP of any kind as a Title II common carrier service. When DSL is phased out entirely by AT&T, there will be no common carrier offering available on AT&T's broadband network. Outside of the legacy copper lines used for DSL, AT&T offers VOIP services. Although VOIP services currently contribute to USF, they do so under a theory of ancillary authority subject to a determination on their status as a Title II service.[19]

Ancillary authority must be ancillary to some Title II, Title III or Title VI service.[20] With Title II POTS completely segregated from AT&T's broadband system, VOIP service (and broadband service) will have no "ancillary" supported service over AT&T's network.

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[18] 47 U.S.C. § 1301.
[19] *Universal Service Contribution Methodology*, WC Docket No. 06-122, Report and Order and Notice of Proposed Rulemaking, 21 FCC Rcd 7518, para. 38 (2006).
[20] Comcast Corp. v. FCC, 600 F.3d 642, 648-49 (D.C. Cir. 2010); Motion Picture Association of America, Inc., et al. v. FCC, 309 F.3d 796, 806 (D.C. Cir. 2002).

Furthermore, the Commission represented to the 8th Circuit that the FCC treats VOIP as a Title I service preempted from state common carrier regulation, and the 8th Circuit agreed. While the Commission had not formally classified VOIP, the 8th Circuit found that the Commission has preempted states from imposing common carrier regulation on VOIP. *Charter Advanced Services*, 903 F.3d at 719.

The AT&T documents demonstrate how the Commission's reasoning in the draft Lifeline *Order* completely falls apart. Following deactivation of the DSL network, POTS will exist on an entirely separate network from AT&T's broadband and VOIP services. POTS will ride over separate legacy copper lines. It will not be offered as a product on the remaining AT&T broadband network. Even if the Commission's analysis that as long as the subscriber is capable of receiving a Title II service that makes the carrier eligible for Lifeline for any Title I service (regardless of whether the subscriber receives any Title II service), AT&T will no longer be able to participate in the Lifeline program anywhere on its wireline broadband network. It will not offer a Title II service on that network to any customer after shutting down its DSL network. States – at least under the FCC's interpretation – cannot classify VOIP as a common carrier service. This process will recur as other legacy carriers phase out their POTS networks and segregate them from their IP networks. Accordingly, VOIP only carriers will join broadband only carriers as not eligible for ETC status, and therefore not able to receive Lifeline.

The Commission is obligated to consider this massive impact on the availability of eligible Lifeline carriers. Although the Commission proposes in the draft *Order* that it considers it worth the sacrifice of Lifeline support for broadband for the purported benefits of Title I classification, *Draft Order* at ¶ 102, the Commission also maintains that its proposed Lifeline rule will avert such a result. The Commission must consider how the complete separation from broadband

networks of any common carrier Title II service increases the risk to Lifeline. The Commission is also obligated to consider whether other changes, such as finally settling the classification of VOIP as a Title II service, would address the harms from the loss of Lifeline support for broadband (and the impact on the USF program as a whole).

A similar error infects the Commission's poll attachment analysis. The Commission confidently observes that the majority of Americans are served by carriers that offer both broadband and either a telecommunications service or a cable service.[21] The Commission ignores both the phase out of telecommunications services over broadband and the impact of cord cutting on cable subscriptions. The AT&T document demonstrates that while broadband providers will continue to offer VOIP, they will no longer offer a "telecommunications service" as required for eligibility pursuant to Section 224. Additionally, AT&T is discontinuing its U-Verse MVPD offer, and will eventually offer only its over-the-top (OTT) streaming service.[22] OTT streaming services do not count as "cable television services" for purposes of Section 224. *See* 47 U.S.C. § 224(a)(4). As a consequence, the entire AT&T network will no longer be eligible for pole attachment rates. Other legacy providers will inevitably follow.

To add a further complication the FCC did not consider in the draft *Remand Order*, it is unclear if AT&T-owned polls will remain subject to the poll attachment rules if AT&T no longer offers any Title II services. The definition of LEC as used in Section 224(a) means a carrier engaged in Local Exchange service. *See* 47 U.S.C. § 153[CITE]. When AT&T has eliminated its Title II service offerings, will it still qualify as a LEC? The Commission must resolve this

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[21] *Draft Order* at 43.

[22] *See* Luke Bouma, *AT&T is Ending Marketing of DIRECTV & U-Verse TV*, CORD CUTTERS NEWS (Mar. 20, 2020), https://www.cordcuttersnews.com/att-is-ending-marketing-of-directv-u-verse-tv/.

question, and the impact of the loss of AT&T-owned polls (and other LEC-owned polls) before reaching the conclusion that it can safely ignore the impact of its reclassification order.

The FCC cannot ignore the evidence now in the record that one of the largest broadband providers in the country will, in the near future, offer only Title I voice and video services. The impact of this transition on both the Lifeline program and the rates for poll attachments if AT&T and other LECs no longer meet the definition of LEC. Failure to do so would be arbitrary.

## CONCLUSION

Even under the generous deference shown by the court in *Mozilla*, the FCC has failed to adequately address the issues on remand. The documents attached to this *ex parte* demonstrate that one of the largest carriers in the United States will act in ways that are directly contrary to the reasoning in the draft *Remand Order*. Accordingly, the Commission should withdraw the draft *Remand Order* from consideration.

Respectfully submitted,

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