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October 30, 2015

REDACTED FOR PUBLIC INSPECTION

Via Electronic Submission

Ex parte

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COMMISSION
CLERK

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353

Dear Ms. Dortch:

On October 28, 2015, Frank Simone, Christopher Heimann, Terri Hoskins, Melissa Waksman and the undersigned of AT&T met with Dan Kahn, Jay Schwarz, Michele Berlove, Heather Hendrickson, Madeleine Findley, Rodney McDonald, and Randy Clarke of the Wireline Competition Bureau concerning the above-captioned matters. The purpose of the meeting was to update the Commission on AT&T's plan to grandfather certain services in the AT&T Technology Transition Trials in West Delray Beach, FL and Carbon Hill, AL¹.

The attached presentation describes the business services AT&T seeks to grandfather, the proposed timeline for doing so, the number of customers that subscribe to these services, and the IP replacement services that are available to customers. The services being grandfathered are a mix of jurisdictionally intrastate and interstate services and are a mix of voice and data services. AT&T expects to file section 214 applications to grandfather the interstate services on November 4, 2015. The proposed grandfather effective date is February 16, 2016.

The attachment contains highly confidential information entitled to protection pursuant to the terms of the Protective Order and Second Protective Order in these dockets. *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket Nos. 13-5, 12-353, Protective Order, DA 14-272 (rel. Feb. 27, 2014); Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket Nos. 13-5, 12-353, Second Protective Order, DA 14-273 (rel. Feb. 27, 2014).* All highly confidential information in the attached document has been clearly marked as such.

¹ "Grandfather" is the discontinuance of service to new customers. Existing customers have the option to continue their legacy service and, for these section 214 applications, may move or change their service at their existing location.

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL Redacted
- CLK _____

Please do not hesitate to contact me with any questions regarding this matter.

Sincerely,
/s/ David L. Talbott

ATTACHMENT

cc: R. Clarke
D. Kahn
J. Schwarz
M. Berlove
H. Hendrickson
M. Findley
R. McDonald

AT&T Wire Center Trials

First Tranche of Services to be Grandfathered

October 28, 2015

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Grandfather Plan

AT&T is planning to grandfather eight services in the two trial wire centers

- These are all business services
- There is a mix of voice and data services
- There are a total of ■ business customers purchasing these services
- There is a mix of intrastate and interstate jurisdictions
- One service is solely jurisdictionally interstate and two are offered under both jurisdictions
- AT&T will file § 214 applications with the FCC to grandfather the three interstate services
- AT&T will follow the applicable state rules for the grandfathering of intrastate services
- AT&T is also meeting this week with the AL and FL Public Utility Commissions



Timeline

DATE	EVENT
11/3/2015	Customer notice letters are mailed
11/4/2015	214 applications filed with FCC
11/18/2015	Expect FCC to release Public Notice
12/18/2015	AL tariff change filed
12/31/2015	Notice sent to wholesale customers
2/15/2016	FL & AL guidebook changes filed
2/16/2016	Proposed grandfather effective date



Services to be Grandfathered

Service to be Grandfathered	Jurisdiction
TV1-Analog Video Service	Interstate
Analog Voice Grade Private Line	Interstate & Intrastate
Analog Private Line Wired Music	Interstate & Intrastate
Measured Rate Trunk	Intrastate
Flat Rate Trunk	Intrastate
ISDN-Primary Rate Interface	Intrastate
ISDN-Basic Rate Interface	Intrastate
Centrex	Intrastate



Product Profile: TV1 – Analog Video Service

Customer Count	AL	FL
Retail	■	■
Wholesale	■	■

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
Transports one channel of video and up to four audio channels at 30Hz to 6.6MHz; Available on either a transmit or receive basis (one-way service). Offered as point to point, point to hub basis. Transported over fiber.	Section 7.2.5 – Tariff F.C.C. No. 1 http://cpr.att.com/pdf/fcc/1007.pdf (pg 7-41) Section 23.5.2.5.1 – Tariff F.C.C. No. 1 http://cpr.att.com/pdf/fcc/1023.pdf (pg 23-165)	Interstate only	FL: cable and other competitors cover approximately 97% of all business locations. AL: cable and other competitors cover approximately 56% of business locations.

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
Serial Component Video Service (SCVS)	See Appendix for Full Description and Benefits Serial Component Video – Serial Component Video Service (SCVS) provides one-way transport of high quality digital video signals and audio signals in an uncompressed format with no loss of video quality.	SCVS is a standards based 270 Mbps digital video. Voice required on another circuit however video transport is superior	Comparable to legacy service
High Definition Video Transport (HDVT)	HDVT is a one-way transmission of a digital video signal between customers designated premises or between customer designated premises and an AT&T Central Office, where available. Transmits raw uncompressed HD-SDI 1.485Gbps. Point to point one-way video service over fiber available on either a transmit or receive basis.	The following standard formats are supported: SMPTE 292M, SMPTE 310M, SMPTE 259M, SMPTE 305M, DVB-ASI. Supports the day-to-day demand of broadcasters, e.g. video contribution and distribution via multiple media.	Comparable to legacy service



Product Profile: Analog Voice Grade Private Line

Customer Count	AL	FL
Retail	■	■
Wholesale	■	■

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
<p>Analog Private Line (APL) services provide point to point and point to multipoint communications between different end user locations at speeds generally below 64Kpbs. The Analog Private Line services have been around for decades. New and current customers are working to replace Analog Private Line services with alternative transport technologies.</p>	<p>B3 http://cpr.att.com/pdf/al/h003.pdf http://cpr.att.com/pdf/fl/h003.pdf</p> <p>E7 2.3 - Intrastate Access (E tariff AL) http://cpr.web.att.com/pdf/al/e007.pdf (pg 9.1) E7 2.3 - Intrastate Access (E tariff FL) http://cpr.web.att.com/pdf/fl/e007.pdf (pg 10) Section 7.2.3 - Tariff F.C.C. No. 1 http://cpr.web.att.com/pdf/fcc/1007.pdf (pg 7-25) Section 23.5.2.3 - Tariff F.C.C. No. 1 http://cpr.att.com/pdf/fcc/1023.pdf (pg 23-151)</p>	<p>Interstate and intrastate</p> <p>(existing customers are purchasing only intrastate service)</p>	<p>FL - 1 out of 2 customers do not have a cable or other competitor. The other has 2 competitors. The customers are also included in the 97% of all business locations which have at least one cable or other competitor .</p> <p>AL -100% of customers have one cable or other competitor. These customers are also included in the 56% of business locations which have at least one cable or other competitor.</p>

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
AT&T Switched Ethernet (ASE)	See Appendix for Full Description and Benefits		
AT&T Switched Ethernet (ASE)	ASE offers Ethernet connectivity for customers with one or more locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change.	ASE provides options for synchronous or asynchronous and symmetrical or nonsymmetrical data transmission. ASE and Business DSL services do not provide power to the customer's equipment. Both services can transmit data much faster than Analog Private Line services.	May vary by location; expected to cover approximately 88% of business locations by EoY 2017
Business DSL Internet – Broadband service option (IPDSL/vDSL)	AT&T Business DSL Internet Service is a high speed Internet service for enterprise customers.		AL: Approximately 50% of Business locations FL: Approximately 39% of Business locations
U-verse High Speed Internet Business Edition	U-verse allows simultaneous voice and data on the same line	With the addition of U-verse voice, capabilities are comparable.	Approximately 49% of the Business locations in AL and 39% in FL



Product Profile: Analog Private Line Wired Music

Customer Count	AL	FL
Retail	<input type="checkbox"/>	<input type="checkbox"/>
Wholesale	<input type="checkbox"/>	<input type="checkbox"/>

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
Wired Music Service provides transmission of music audio signals at 50-15,000 Hz, 200-3,500 Hz, 100-5,000 Hz or 50-8,000 Hz. The main application is music transmitted over telephone lines or radio station relays to high elevations for transmission.	<p>Section 7.4.2 – Tariff F.C.C. No. 1 http://cpr.att.com/pdf/fcc/1007.pdf (pg 7-38)</p> <p>E7.2.4 - Intrastate Guidebook (E tariff AL) http://cpr.att.com/pdf/al/e007.pdf (pg 35)</p>	Interstate and intrastate	Program distribution can be done via satellite and internet

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
	See Appendix for Full Description and Benefits		



Product Profile: Measured Rate Trunk

Customer Count	AL	FL
Retail	<input type="checkbox"/>	<input type="checkbox"/>
Wholesale	<input type="checkbox"/>	<input type="checkbox"/>

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
Classification of exchange service which is charged on the basis of local usage and determined by the number of calls, distance of calls and time of day.	(AL) A3.20.7 http://cpr.web.att.com/pdf/al/g003.pdf (pg 4) (FL) not applicable	Intrastate only	AL - 56% of business locations have at least one cable or other competitor. FL: not applicable

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
IP Flexible Reach	AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers' phone sets.	Comparable to legacy service
VDNA-E	AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution.	Local Toll and LD usage are not included with legacy service; IP services include an all-distance voice plan; usage caps are tailored to customer need	
Office@Hand	A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free		



Product Profile: Flat Rate Trunk

Customer Count	AL	FL
Retail	■	■
Wholesale	■	■

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
Classification of exchange access line service of which a stipulated charge is made regardless on the amount of use.	(AL) A3.7 http://cpr.att.com/pdf/al/g003.pdf (pg26) (FL) A3.4 http://cpr.att.com/pdf/fl/g003.pdf (pg 26)	Intrastate only	FL - approximately 80% of customers have a minimum of 2 cable and other competitors. The remaining approximately 20% have 1 cable or other competitor. The customers are also included in the 97% of all business locations which have at least one cable or other competitor AL - 100% of customers have a minimum of 1 cable and other competitors. These customers are also included in the 56% of business locations which have at least one cable or other competitor.

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
IP Flexible Reach	See Appendix for Full Description and Benefits AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers' phone sets.	Comparable to legacy service
VDNA-E	AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution.	Local Toll and LD usage are not included with legacy service; IP services include an all-distance voice plan; usage caps are tailored to customer need	
Office@Hand	A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free		



Product Profile: Primary Rate ISDN (PRI)

Customer Count	AL	FL
Retail	■	■
Wholesale	■	■

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
<p>Integrated Services Digital Network Primary Rate Interface (ISDN PRI) is a voice and data service that provides high-volume access to the public switched telephone network (PSTN). This service lets customers transmit data at high speeds to accommodate voice, data, image, and video over the same digital facilities. ISDN PRI provides 23 digital channels over one transport line (a 24th channel carries signaling information). This service offers customers one T1 circuit with 23 separate voice lines or a combination of services</p>	<p>A42.3 http://cpr.att.com/pdf/al/g042.pdf (pg 24) http://cpr.att.com/pdf/fl/g042.pdf (pg 40)</p>	Intrastate only	<p>FL: cable and other competitors cover approximately 97% of all business locations. AL: cable and other competitors cover approximately 56% of business locations.</p>

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
IP Flexible Reach	<p>See Appendix for Full Description and Benefits</p> <p>AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.</p>	<p>IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers phone sets.</p>	<p>Comparable to legacy service</p>



Product Profile: Basic Rate ISDN (BRI)

Customer Count	AL	FL
Retail	■	■
Wholesale	■	■

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
<p>ISDN - Business Service (IBS) supports simultaneous transmission of voice, data, and packet services on the same exchange access line. Calling/Called Number Delivery, Calling Name Delivery, and Call Hold are included with this service. IBS provides a method of access to the telephone network called Basic Rate Access. Basic Rate Access consists of the ability to access up to two 64 Kbps (B) channels and one 16 Kbps (D) channel at the service delivery point. IBS is provided through Basic Rate Access. Features are available to increase the capability of the Bearer Alternative Service and may be subscribed to on an as-needed basis B channel circuit switched services offer up to 64 Kbps intra-office transmission of voice or data. This option permits the customer to utilize either circuit voice or data transmission paths on a per call selection basis. Transmission on the B channel will be circuit switched at 64 Kbps within the switch and/or equipped facilities between ISDN compatible central offices.</p>	<p>A42.1 http://cpr.att.com/pdf/al/g042.pdf (pg 1) http://cpr.att.com/pdf/fl/g042.pdf (pg 1)</p>	Intrastate only	<p>FL - 100% of customers have a minimum of 2 cable and other competitors. The customers are also included in the 97% of all business living units which have at least one cable or other competitor AL: cable and other competitors cover approximately 56% of business locations.</p>

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
Business DSL Internet – Broadband service option (IPDSL/vDSL)	See Appendix for Full Description and Benefits AT&T Business DSL Internet Service is a high speed Internet service for enterprise customers.	Business DSL can provide data access for multiple devices (equivalent of 2 data ISDN lines).	Approximately 49% of the Business locations in AL and 39% in FL
U-verse High Speed Internet Business Edition	U-verse allows simultaneous voice and data on the same line	With the addition of U-verse voice, capabilities are comparable to ISDN.	Approximately 49% of the Business locations in AL and 39% in FL



Product Profile: Centrex

Customer Count	AL	FL
Retail	<input type="checkbox"/>	<input type="checkbox"/>
Wholesale	<input type="checkbox"/>	<input type="checkbox"/>

Description	Tariff / Guidebook	Jurisdiction	Competitive Alternatives
A Central Office hosted phone service with user interface, built in redundancy, and 24 hour monitoring and maintenance.	(AL) A12.25 http://cpr.att.com/pdf/al/g012.pdf (pg45) (FL) A12.25 http://cpr.web.att.com/pdf/fl/g012.pdf (pg 12)	Intrastate only	FL - approximately 21% of customers do not have a cable or other competitor. The remaining 79% have 2 or more competitors. The customers are also included in the 97% of all business locations which have at least one cable or other competitor.

Replacement IP Products – Comparison Overviews

IP Replacement	Description	Function & Features	Coverage
IP Flexible Reach	See Appendix for Full Description and Benefits AT&T IP Flexible Reach is a SIP-enabled trunking service that delivers an integrated access solution, combining Voice & Data across a common transport solution. It supports inbound and outbound calling across the AT&T IP network, providing local, U.S. long distance and international long distance reach for U.S. sites.	IP service includes new IP enabled features and many TDM features. CLASS calling features (e.g., *69) are supported by customers' phone sets.	Comparable to legacy service
VDNA-E	AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution.		
Office@Hand	A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free		



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