

July 9th, 2013

Re: New York Public Service Commission Case 13-C-0197 – Verizon New York’s filing seeking approval to substitute the “Voice Link” wireless service for landline service, ending copper wiring-based traditional telephone service at Verizon New York’s discretion

Introduction

The 134 undersigned County Executives, Legislators, Mayors, Supervisors, Councilors, et al. who represent residents and businesses in 68 municipalities in New York State (“Municipalities”) submit these comments in response to the Notice issued on May 21, 2013, by the New York Public Service Commission (“PSC” or “Commission”),¹ seeking comment on the tariff submitted on May 3, 2013, by Verizon New York Inc. (“Verizon”), in which Verizon seeks to offer its new wireless Voice Link service in lieu of its traditional landline service not only on Fire Island, but also more broadly throughout the State, where, in Verizon’s view, conditions so warrant. The outcome of the Commission’s investigation of Voice Link directly and significantly affects municipalities throughout the urban, suburban, and rural areas of New York State. As these comments demonstrate, it is premature to embrace Voice Link as an adequate substitute for Verizon’s wireline service. If the Commission were to grant Verizon the excessive discretion that the company seeks, that broad latitude would hamper municipalities’ ability to fulfill their public safety and economic development responsibilities. Instead, Voice Link should be considered an experimental offering to be tested thoroughly in isolated and unique situations, on a temporary basis. For the reasons discussed in these comments, Municipalities urge the Commission to reject Verizon’s proposed Voice Link tariff.

Background

On May 16, 2013, the Commission issued an order in this proceeding allowing Verizon to use Voice Link service, which is a wireless service, as an alternative to basic landline service, to provide service to customers in western Fire Island.² In approving this limited use of Voice Link service, the Commission stated: “because it is critical that service be available to Fire Island immediately, we will allow Verizon’s tariff amendment to use Voice Link in the western part of

¹ Case 13-C-0197 – Tariff filing by Verizon New York Inc. to introduce language under which Verizon could discontinue its current wireline service offerings in a specified area and instead offer a wireless service as its sole service offering in the area, Notice Inviting Comments, issued May 21, 2013 (“Notice”), at 1.

²New York Public Service Commission Case 13-C-0197, Tariff filing by Verizon New York Inc. to introduce use of wireless technology as an alternative to repairing damaged facilities, Order Conditionally Approving Tariff Amendments in Part, Revising in Part, and Directing Further Comments, issued and effective May 16, 2013 (“Order”). The Commission indicated that “[o]n May 3, 2013, Verizon submitted certification and documentation that its western Fire Island facilities are destroyed, rendered unusable, and beyond reasonable repair,” and that the “Commission’s review of Verizon’s submission is in progress.” Notice, at 3.

Fire Island to go into effect subject to further review, monitoring and public comment.”³ In light of the fact that Hurricane Sandy occurred many months ago (in October 2012), Municipalities would have preferred that Verizon had sought regulatory approval well in advance of its May 3rd filing date with the Commission, in order to provide a less expedited review of Verizon’s Voice Link tariff. Nonetheless, Municipalities concur with the Commission’s temporary approval so that Verizon can offer telephone service to the seasonal residents and visitors who are now returning to Fire Island.⁴ The Commission granted this authority provided that Verizon certified and demonstrated that “its wireline facilities are destroyed or beyond reasonable repair.”⁵ The Commission limited its approval of Voice Link as a temporary solution for Fire Island to the summer of 2013. In its Notice, the Commission stated, among other things:

This notice invites comments from any interested party or person on these matters by June 18, 2013. Specifically, the issues presented include: use of Voice Link in western Fire Island, its use in other geographic areas with destroyed wireline facilities, and its use in areas based upon geographic location, availability of alternative telecommunications providers, or other Commission designated criteria.⁶

Summary of Major Concerns

Based on Municipalities’ analysis of Verizon’s proposed tariff, we have several concerns with Verizon’s filing with the Commission, and, as a result, we urge the Commission to investigate the tariff fully through a comprehensively litigated regulatory proceeding. Furthermore, the Commission should issue an unambiguous directive to Verizon to cease and desist offering Voice Link except on a temporary basis on Fire Island.

The Commission’s investigation is essential for many reasons, among which are the following:

- Voice Link creates numerous new threats to public safety, which, in turn, would hamper municipalities’ ability to protect their communities.
- Voice Link creates an incentive for Verizon to allow its copper network to deteriorate and for it to abandon its copper outside plant prematurely. When outside plant is inadequately maintained, consumers’ safety is jeopardized because their dial tones may not function when they need to reach emergency services.

³ Order, at 1-2, cite omitted.

⁴ Id.

⁵ Notice, at 1.

⁶ Id., at 1-2.

- Voice Link does not support broadband access to the Internet, and, therefore, Verizon’s new service undermines municipalities’ efforts to spur economic development.
- Voice Link does not support point-of-sale transactions, and, therefore, would harm small businesses and municipalities’ economy.
- Voice Link does not support LifeAlert or other monitoring services, potentially endangering members of the public who rely on these services.
- Voice Link is not available to Lifeline telephone service customers. Affordable traditional telephone service would become unavailable in any area served only by Voice Link.
- Voice Link service is not as reliable as telephone service delivered over a properly-maintained copper or fiber-optic network, since wireless signal is often weak, spotty, or overburdened by other network traffic.

Public safety is of paramount importance to municipalities.

A long-standing and critically important role of municipalities is to protect the public safety of their residents and businesses. Threats to public safety take many forms including such incidents as life-threatening medical conditions, domestic abuse, fires, chemical spills, terrorist threats, and extreme weather conditions. Furthermore, more than one event may occur simultaneously, creating a particularly critical need for people to be able to reach emergency services reliably and without delay, such as an elderly person having a stroke during a blizzard that has caused a power failure. Voice Link raises numerous threats to public safety and to municipalities’ ability to fulfill their public safety obligations.⁷

Voice Link is less reliable during power outages than copper-based wireline service. Voice Link is not as reliable as is Verizon’s conventional copper-based telephone service. Except in rare instances, Verizon’s copper-based service continues to operate during power outages.⁸ Consumers’ ability to reach public safety is always essential and, during black-outs and other extreme weather conditions, arguably even more so. The Commission states that the Voice Link “device is equipped with a battery back-up, in case of commercial power loss,” and that “[a]ccording to Verizon, available devices are equipped with rechargeable battery packs,

⁷ Regarding its plans for Fire Island, “Verizon indicates that it will deploy and repair copper facilities to provide landline service to firehouses, police stations, and other municipal buildings.” Order, at 3, footnote 2. Municipalities certainly appreciate Verizon’s plans to deploy landline service to municipal buildings, but nonetheless are concerned that consumers’ ability to reach municipal agencies and emergency services continue to be placed in jeopardy by consumers’ reliance on the wireless Voice Link service.

⁸ If Verizon fails to maintain its outside plant properly, defective cables may not be able to withstand flooding. However, assuming Verizon proactively maintains its network, its voice service continues to operate during power outages.

while newer units are expected to operate on standard AA batteries.”⁹ Of course the fact that the battery packs are rechargeable is irrelevant during power outages. Finally expectations about Voice Link’s *future* ability to operate with standard AA batteries should be afforded minimal weight *today* as the Commission assesses the public safety implications of Verizon’s proposed Voice Link tariff.

Voice Link is incompatible with consumers’ medical and security systems. Voice Link does not support medical alert and home security monitoring systems.¹⁰ This poses serious concerns for public safety. Even if the customer has the opportunity to purchase a separate service from another provider to replace the data transmission capabilities that Voice Link lacks, the inconvenience and additional cost will pose a formidable economic barrier.

Information about a customer’s location is not updated when a customer moves and brings the Voice Link equipment along. Although the Commission describes Voice Link as remaining “stationary at one location in the customer’s premises,”¹¹ it is Municipalities’ understanding that there is no obstacle to consumers taking their Voice Link equipment to new residences if they choose to do so. A consumer who relocates and who brings the Voice Link equipment will be “bringing” the geographic location of the original Voice Link location erroneously to the new location. If the customer then calls E-9-1-1 from her new home, the 9-1-1 agency will see the prior customer’s location. Further exacerbating this threat to public safety is the fact that many consumers receive paperless billing, meaning that Verizon may not be aware that its consumer has re-located.

In sharp contrast with the limited capabilities of Voice Link, with wireline service, a customer’s 9-1-1 location is permanently and inalterably linked to the location to which the service is provided. Furthermore, with “conventional” mobile wireless service, a consumer’s wireless phone is programmed to transmit the user’s location of the nearest cell tower. With the more limited wireless capability of Voice Link, such information will not be communicated.

Voice Link also does not support any other data communications capabilities, including fax machines and point-of-sale devices. Voice Link also does not support fax transmissions,¹² which residents and businesses routinely depend on for fast delivery of documents. As discussed in more detail below, Voice Link does not support point-of-sale devices – a cornerstone of daily commercial transactions in retail businesses of all sizes.

⁹ Notice, at 2. See also Order, at 4, which states: “In case of commercial power failures, the units are equipped with a rechargeable backup battery that provides up to two hours of talk time and 36 hours of standby time.”

¹⁰ Notice, at 2.

¹¹ Notice, at 2.

¹² Order, at 6.

Voice Link creates an additional economic incentive for Verizon to allow its outside plant to deteriorate, and during that period of infrastructure neglect, public safety is placed in jeopardy. If approved, Verizon’s proposed tariff would provide the company with seemingly unfettered latitude to decide to deploy Voice Link rather than to maintain and repair its copper plant. Municipalities are concerned that the proposed tariff would lead to the following scenario occurring throughout the state: Verizon allows outside plant in a particular neighborhood to deteriorate to such an extent that Verizon would then “determine” that it is more cost-effective to deploy Voice Link. Public safety then would be placed in jeopardy twice: first, during the time of neglect when dial tone reliability could be jeopardized¹³ and then second, when Voice Link service is deployed. During these years of technological transition, the Commission should monitor carefully Verizon’s investment in maintaining its copper outside plant so that Verizon, through neglect of its existing infrastructure, does not implicitly force consumers to “choose” Voice Link. Municipalities do not oppose migrations to new technological platforms, but the transition should be managed in such a way as to prevent unnecessary threats to public safety, raise prices for broadband services, and cut off various services such as LifeAlert and credit-card processing. Our telecommunications infrastructure should not diminish municipalities’ ability to protect their citizens.

Unlike Verizon’s wireline voice services, Voice Link does not support broadband access to the Internet, and therefore its deployment undermines communities’ economic development goals.

Municipalities oppose the widespread use of Voice Link, because it would diminish businesses’ options for obtaining broadband access to the Internet. Voice Link is not compatible with digital subscriber line (“DSL”) service.¹⁴ Yet businesses’ and residents’ ability to connect with broadband services to the Internet is essential for economic development in today’s information age.¹⁵

The Commission observes that: “In lieu of making repairs to wired facilities, Verizon is enhancing the wireless capability on Fire Island, from which residents and visitors to Fire Island

¹³ In the neighboring state of Massachusetts, responding to municipal officials’ and consumers’ concerns regarding Verizon’s quality of service in Western Massachusetts, the Massachusetts Department of Telecommunications and Cable conducted a comprehensive investigation, and pursuant to the regulatory approval of a settlement, Verizon Massachusetts has surveyed and repaired outside plant in rural communities in Western Massachusetts. See, Massachusetts D.T.C. 09-1, Investigation by the Department of Telecommunications and Cable on its own motion, pursuant to General Law Chapter 159, Section 16, of the telephone service quality of Verizon New England Inc., d/b/a Verizon Massachusetts, in Berkshire, Hampden, Hampshire, and Franklin Counties, Order on Joint Motion for Approval of Settlement, February 10, 2011. See also, Settlement Agreement by and among the Office of the Attorney General of Massachusetts, Verizon New England Inc., d/b/a Verizon Massachusetts, Local 2324, International Brotherhood of Electrical Workers, AFL-CIO and the Towns of Hancock, Egremont and Leverett, November 30, 2010.

¹⁴ Notice, at 2.

¹⁵ See, e.g., FCC’s “Connecting America: the National Broadband Plan” (2010), at xi, 193-194, and 265-276.

will no doubt benefit, including use of wireless broadband in place of DSL.”¹⁶ Municipalities welcome Verizon’s efforts to enhance its wireless capabilities on Fire Island and throughout New York but do have several concerns with Verizon’s seeming attempt to force consumers to migrate to wireless broadband offerings. First, the Commission does not oversee the rates for wireless Internet access services, yet the industry is highly concentrated, meaning that municipalities cannot rely on market forces to yield affordable rates.¹⁷ Wireless alternatives are more expensive than wireline services, and there is negligible competitive pressure to cause Verizon Wireless to offer reasonable rates for wireless service. Second, unlike DSL, FiOS, and cable-based broadband alternatives, the usage for wireless broadband service is metered, and when consumers exceed a usage cap, they must pay high rates for the above-cap usage (and this is in addition to monthly rates that are already high).¹⁸ Where Verizon exits the wireline broadband market, those municipalities will have at best one wireline broadband option – the cable company’s offering. Our residents and businesses should not be subjected to monopoly pricing and service quality for wireline broadband service. Some of us represent areas where there is no cable company – and DSL is the only reliable broadband service. Our residents and businesses are especially dependent on the traditional telephone network.

Businesses rely on point-of-sale transactions and yet Voice Link does not support credit card transactions.

¹⁶ Order, at 7.

¹⁷ The major nationwide wireless carriers serving consumers in New York include AT&T Wireless, Sprint, T-Mobile and Verizon. The FCC estimates that these four nationwide carriers served over 90 percent of the subscribers in the United States (with AT&T Wireless and Verizon Wireless serving 64 percent of subscribers). *In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, WT Docket No. 11-186 (Terminated), *Sixteenth Report*, rel. March 21, 2013, at para. 8. (On November 16, 2012, SoftBank Corp. (“SoftBank”), its indirect United States subsidiary Starburst II, Inc. (“Starburst II”), and Sprint Nextel Corporation (“Sprint”) submitted their applications to the FCC pursuant to sections 214 and 310(d) of the Communications Act of 1934, as amended and sections 34-49 of the Submarine Cable Landing Act, seeking the Commission’s approval of the transfer of control of various licenses, leases, and authority now held by Sprint and its subsidiaries and by Clearwire Corporation (“Clearwire”) to SoftBank and Starburst II. The proposed transaction is under review. Public Notice DA 12-1924, SoftBank and Sprint Seek FCC Consent to the Transfer of Control of Various Licenses, Leases, and Authorizations from Sprint to SoftBank, and to the Grant of a Declaratory Ruling Under Section 310(B)(4) of the Communications Act, IB Docket No. 12-343, November 30, 2012.)

¹⁸ In Pennsylvania, in response to consumers’ request for broadband service, Verizon offered 4G LTE rather than the DSL that consumers had anticipated receiving. In contrast with DSL service, 4G LTE has data caps and therefore is a more expensive way to obtain broadband access to the Internet. *Petition of David K. Ebersole, Jr. and the Office of Consumer Advocate for a Declaratory Order*, Pennsylvania PUC P-2012-2323362, *Final Order*, February 28, 2013; *Petition of David K. Ebersole, Jr. and the Office of Consumer Advocate for a Declaratory Order*, Pennsylvania PUC P-2012-2323362, *Dissenting Statement of Commissioner James H. Cawley*, February 28, 2013.

Voice Link deployment will also harm economic development in municipalities because many businesses rely on point-of-sale transactions, which Voice Link does not support.¹⁹

The Commission states the following in its Order:

The company submits (although not reflected in the tariff amendment) that Voice Link will be available to business customers as well as residential customers. Multi-line service will also be available for businesses, and Verizon Wireless will make available wireless data services and devices to support point-of-sale credit card processing and similar data functionalities required by small businesses.²⁰

Municipalities are unaware of any tests of these alternative devices nor are we aware of the rates that Verizon would charge for such devices. Until complete information is available about the key attributes of these alternative devices, including but not limited to their reliability, ease of use, security, and prices, Municipalities are concerned about the impact of Voice Link on small businesses' ability to operate effectively. On Fire Island, according to media reports, businesses that need credit card processing to survive still do not have these capabilities available to them.

Wireless service quality is insufficient and the State has no service quality standards in place

New York State deregulated wireless service in 1997 and the Commission does not exert any regulatory authority over wireless service. Traditional telephone service, in contrast, is regulated. Verizon must meet requirements including making timely repairs on out-of-service lines, static and signal quality, and call center holding times. Wireless service, in contrast, is often unreliable. Dropped calls, static and other problems are common. As wireless technology develops, service quality may improve. At this time, wireless service quality is inferior to properly maintained landline telephone service.²¹

Telephone service is a basic utility service that should be available and affordable, yet Voice Link will not be offered to Lifeline customers

Hundreds of thousands of indigent New Yorkers depend on Lifeline telephone service. Verizon will not offer Lifeline service over Voice Link. Municipalities are concerned that our residents who cannot afford full price will lose job opportunities and access to civic services. Telephone service – and increasingly internet service – is a utility service that should be affordable. Instead, Voice Link will lead to much higher prices for customers who rely on

¹⁹ Notice, at 2.

²⁰ Order, at 5.

²¹ We note Verizon has repeatedly violated its service quality requirements, leading to Commission fines even after the Commission relaxed service quality requirements. The Commission should enforce service quality requirements. Nonetheless, landline service quality is typically much higher than wireless service quality; dropped calls, static and other problems on the telephone network are still comparatively rare.

Lifeline telephone service. As explained above, broadband service will also become more expensive.

Conclusion

The Commission stated that “[it] has been the Commission’s policy that utilities determine how to provision service via any combination of facilities - wires, fiber optics, electronics - so long as the tariffed service meets the Commission’s prescribed rules and customer expectations.”²² Voice Link, as currently offered, does not meet Municipalities’ expectations. Instead, Voice Link would jeopardize municipalities’ ability to fulfill their responsibility to protect the safety of the citizens who reside and work in their communities. Voice Link would raise the cost of businesses seeking to complete point-of-sale transactions. The broad and significant implications of Verizon’s proposed tariff warrant a full investigation. New technology should be deployed *after* solutions are found, not before. Municipalities urge the Commission to develop a full factual record and to offer interested stakeholders the opportunity to participate fully in this important proceeding. Municipalities rely on the Commission to guide the evolution of the state’s telecommunications infrastructure in a manner that protects citizens’ safety and promotes economic development.

Signed,

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Don Moore - Common Council President, Hudson, NY
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Paul Feiner – Supervisor, Town of Greenburgh
Ken Jenkins - Chairman, Westchester County Board of Legislators
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Jo-Ann Dyckman - Town Clerk, Town of Cortlandt

²² Order, at 6, cite omitted.

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