

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of

International Comparison and Survey Requirements in the Broadband Data Improvement Act)	GN Docket No. 09-47
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Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act)	GN Docket No. 09-137
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A National Broadband Plan for Our Future)	GN Docket No. 09-51

COMMENTS – NBP PUBLIC NOTICE #25

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s (Commission) *National Broadband Plan Public Notice #25* released December 1, 2009. In the *Public Notice*, the Commission seeks to gather information to help determine whether a detailed *Notice of Inquiry (NOI)* should be issued relating to a policy framework to facilitate and respond to a transition from the country’s circuit-switched Public Switched Telephone Network (PSTN) to an all internet protocol (IP)-based network. ATIS agrees with the Commission’s observation that an IP network transition “has significant impact on the circuit switched PSTN, a system that has provided, and continues to provide, essential services to the country.” ATIS appreciates the opportunity to provide input from its perspective as the leading developer of

technical, operational and strategic standards relating to the operability and interoperability of the current circuit switched networks and emerging next generation networks.

I. Background

ATIS is a global standards development and technical planning organization committed to providing leadership for, and the rapid development and promotion of worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. ATIS' membership is diverse, including all stakeholders from the ICT industry – wireline and wireless service providers, equipment manufacturers, competitive local exchange carriers, data local exchange carriers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics companies, digital rights management companies, and internet service providers.

Nearly 600 industry subject matter experts from more than 250 ICT companies work collaboratively in ATIS' 18 open industry committees, which focus on a broad range of priorities for the ICT industry, including network architectures and platforms, the ordering and billing of services, E9-1-1, cyber security, the reliability and interoperability of current and next generation technologies, the seamless delivery of converged wireline and wireless services such as IPTV over multimedia platforms, and the networks of the future.

II. Considerations for Further Inquiry Regarding the Circuit Switched to All IP Network Transition

As an initial matter, ATIS strongly supports the Commission's view that the continued deployment of broadband services and technologies will provide consumers with access to and support for a multitude of new services and applications, including integrated voice, data, and video applications. ATIS also recognizes that the provision of these integrated services will require changes to the current circuit switched networks, including greater and greater deployment of IP-based services. Given the significance of such an undertaking and the relationship between standards and regulatory work, ATIS supports the Commission's first step in this *Public Notice* to gather information to help it determine whether to issue a detailed *NOI*. ATIS believes that this step is necessary to ensure that any future steps taken do not jeopardize either the current circuit switched networks or its continued evolution.

In the *Public Notice*, the Commission seeks comment on the relevant policy questions related to how best to monitor and plan for the transition, including how to efficiently migrate to an all IP world and how best to prepare for such a transition. ATIS supports the *Public Notice's* examination and would support the issuance of a more detailed *NOI* related to an all IP network transition. However, because the development of a policy framework should not and cannot be created in a vacuum, ATIS recommends that due consideration be given to the significant, complex and intertwined policy and technical challenges that an IP network transition would present.

As the Commission explores whether to issue an *NOI* regarding a policy framework related to the transition from circuit-switched network to an all IP Network, ATIS recommends that the Commission consider how the transition would affect the following

policy areas: the development and implementation of new services; wireless integration; bundling rules; emergency services, availability/reliability of services; performance; security/privacy; operator services; terminal services; and carrier interconnection.

Additionally, ATIS encourages the Commission to consider the impact of maintaining both, the legacy circuit switched network and the new IP network, for a period of time to ensure continuity of service and interconnection.

Many of ATIS' committees and forums address several of the areas of consideration enumerated above. Work within these committees focuses on the existing, circuit-switched network and the next generation, IP network, as well as the transition between the two. ATIS urges the Commission to promote the adoption of voluntary, consensus-based technical, operational and strategic standards pertaining to the current circuit-switched networks and the next generation networks through standard development organizations such as ATIS. While extensive work is being done in many of ATIS' committees, outlined below is a sampling of some of the key work underway in ATIS that is directly related to the transition to IP networks.

For instance, ATIS TOPS Council's Facilities Consolidation Task Force (FC-TF) was established to assist service providers who are involved in or considering consolidation of facilities within their networks and businesses for cost savings, efficiency and environmental sustainability purposes. The FC-TF is engaged in preparing an assessment that identifies the technologies and implementations that will enable efficient facilities consolidation as well as the requirements which may cause impediments including regulatory and business constraints that must be considered by service providers. ATIS notes that these regulatory and business constraints considerations may be helpful to address the *Public Notice's* inquiry regarding

which “policies and regulatory structures may facilitate, and which may hinder, the efficient migration in an all IP world.” The FC-TF plans to conclude its assessment with recommendations to the ATIS TOPS Council and ATIS Board of Directors on the need for and feasibility of further action to develop coordinated industry best practices, identify regulatory concerns, or other direction towards a common solution. The FC-TF anticipates completing its report and recommendations by spring 2010.

ATIS’ Next Generation Interconnection Interoperability Forum (NGIIF) works on issues that also may be of interest to the Commission in its consideration of the transition to next generation, IP-based networks. The NGIIF was created to address the interconnection between evolving and next generation networks and provides an open forum to discuss and resolve industry-wide issues associated with network interconnection and interoperability that involve network architecture, management, testing, operations, and facilitates the exchange of information concerning these topics.

Another ATIS Forum that works on significant issue related to the development and deployment of IP networks and services is the Packet Technologies and Systems Committee (PTSC). The PTSC develops standards, technical specifications and technical reports for evolving packet architectures and applications. PTSC’s work allows systems to interoperate and services to be provided over packet-switched networks. The PTSC has established a Next Generation Carrier Interconnect (NG-CI) Task Force to develop an IP network to network interconnection guideline based on ATIS standards that will provide physical configuration, protocol suite profile, operational information to be exchanged between carriers, and test suites in order to support conformance and interoperability testing.

III. Conclusion

Given the increasingly significant role of broadband to our nation's technological and economic advancement and the continued evolution of the country's communications network to meet consumer demands, ATIS supports the approach taken by the Commission in releasing a *Public Notice* to solicit feedback on the complex policy issues related to a transition from current circuit-switched network to an all IP Network and appreciates the opportunity to provide its input regarding this matter. Additionally, ATIS would support the Commission's issuance of a detailed *NOI* that takes into account the interconnection of the policy and technical challenges involved in transitioning to an all IP network.

Respectfully submitted,

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