Attachment 1.

CWA Ex Parte Meeting on *Wireline Transitions*
June 22, 2015

1. The Commission should move forward expeditiously to establish rules on back-up power, copper retirement, and service discontinuance.

2. These policies will facilitate transition to high-speed networks, consistent with FCC policy to protect consumers, public safety, universal service, and competition.

3. CWA proposals
   
   a. Back-up Power. Minimum 8 hours, moving to 24 hours
   
   b. Network Change Notification/Copper Retirement. Differentiate between an upgrade (to fiber) and a downgrade (to wireless or fixed wireless). Require adequate notice and comment period for retail and wholesale customers.
   
   c. Section 214 Service discontinuance. Criteria:
      i. Reliable and accurate access to E911
      ii. Constant availability
      iii. Adequate call quality
      iv. Compatibility with health and safety devices that use the network
      v. Adequate data transmission capability
      vi. Affordable to consumers
   
   d. See also criteria in *Voice Link* (2013) and *Southwestern Bell Dark Fiber* (1993)
      i. Voice Link: reasonable substitute available; need for the service and facilities; existence, availability, and adequacy of alternatives; increased charges for alternatives; public interest
      ii. Southwestern Bell: financial impact on carrier; need for the service and facilities; existence, availability and adequate of alternatives; increased charges for alternative services

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4. CWA, Public Interest Commentators, AARP, and state Commissions in NY and PA have provided powerful evidence of “de facto” service discontinuance in violation of FCC’s rules.\(^2\) Consumers need rules to file complaints against these practices. CWA evidence in the record includes

a. Verizon inadequate investment in maintenance and repair of copper facilities
b. Verizon long delays in service restoration and repair
c. Verizon inadequate staffing to maintain and repair copper facilities
d. State deregulation policies do not adequately protect copper customers

5. Additional evidence

a. NY City Audit: Verizon failure to meet its obligation to deploy FiOS throughout New York City by end of 2014 (Attachment)

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