

Advocacy Submits Comments to FCC regarding Network Technology Transitions

On June 23, 2015 Advocacy filed an *ex parte* letter with the Federal Communications Commission (FCC) regarding several proposals the FCC is considering adopting that would govern incumbent local exchange carriers' (ILEC) obligations with regard to both consumers and competitive carriers when modernizing their networks.

In its notice of proposed rulemaking, the FCC stressed that technology transitions must preserve the principles of the Communications Act that have defined the relationships between those who build and operate networks and those who use them—competition, consumer protection, universal service, public safety and national security. Advocacy offered support to the FCC's goal of preserving competition as network technology evolves, and specifically suggested that the FCC:

- adopt a rebuttable presumption requiring applications for the discontinuance of wholesale service offerings, under the FCC Section 214 copper retirement rules, and
- require incumbent providers to offer equivalent wholesale rates, terms, and services to competitive providers when it grants such applications.

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