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Contact:

Regina Costa, TURN, (Chair, NASUCA Telecommunications Committee), 415-786-8831

### **Consumer Advocates Seek Stronger Protections, ask FCC to Reconsider Tech Transitions Order**

Washington, D.C. -- The National Association of State Utility Consumer Advocates (“NASUCA”) today filed a Petition for Reconsideration asking the Federal Communications Commission (FCC) to reconsider certain guidance contained in the recent Tech Transitions Voice Replacement Service Order (“FCC Order”).

While Petitioners agree the FCC’s Order adopts good rules describing the criteria a replacement for legacy voice telephone service must meet to achieve the Commission’s objective of consumers receiving service with comparable service quality and performance to that provided over the Public Switched Telephone Network (“PSTN”), the *technical guidance* in the Order’s Technical Appendix B undermines the Commission’s objective.

“The FCC adopted important rules to ensure that consumers continue to receive high quality, reliable service,” said Regina Costa of TURN, The Utility Reform Network. “The goal of our petition is to ensure that those rules actually work.” NASUCA President Bob Nelson added “We are urging the FCC to take further action to ensure that the tech transitions process will achieve the FCC’s stated objective; that consumers continue to receive high quality, reliable telephone service.”

Technical Appendix B to the FCC Order presumes that “over-the-top” VoIP services can serve as adequate replacements to traditional telephone service. Petitioners disagree. The Petition for Reconsideration demonstrates that services meeting the technical guidance in the FCC’s Order would be of inferior quality to traditional phone service, that the guidelines for testing alternatives are insufficient and that important complications involved when calls travel across different networks are not fully addressed.

NASUCA is the leading voice for consumer across the United States, including 44 consumer advocates offices in 40 states and the District of Columbia. NASUCA’s members represent the interests of utility consumers before state and federal regulators and in the courts. The full petition is attached.