



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA

MARYBEL BATJER
PRESIDENT

TEL: (916) 823-4840
WWW.CPUC.CA.GOV

September 23, 2020

Via Email

Good afternoon Fassil,

Thank you for the notice and update on your actions to transition your DSL customers to fiber and wireless services. It should come as no surprise that this transition comes at a very concerning time, given the state of the numerous, active record-breaking wildfires and the COVID-19 pandemic that the State of California is experiencing.

This letter is short on details, making this course of action of grave concern. Legacy DSL service may be more than 20 years old and may account for less than 5% of AT&T's internet base nationally. However, given the size of AT&T, and depending on how "internet base" is defined, this is a *substantial* – if not massive – number of American households. Further, you are well aware that in far too many communities this *obsolete and antiquated* service is still the best service available.

I appreciate that current DSL customers will be able to continue with their existing service and that those with the good fortune of having AT&T Fiber available to them will be provided superior service. This being said, barring those without any other options from subscribing to your DSL service because they have not been "grandfathered in" creates untenable inequities within the communities that have no other options. Additionally, replacing a wireline broadband connection – as you propose – with a wireless broadband connection is often much more expensive, slower, and has very limiting data caps.

Please provide responses to the following:

1. **ATM-based DSL Service:** You indicate that "ATM-based DSL service customers are a very small percentage of AT&T's fixed broadband customers in California."
 - a) What is the specific number of customers in California?

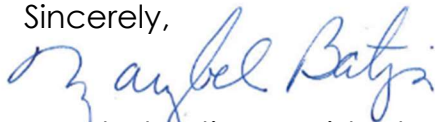
- b) What census blocks do these customers reside in?
2. **Other Services:** You differentiate between different types of customers (ATM-based DSL, IPDSL, wholesale customers, etc.), which further makes the impact of this announcement unclear. Please provide a complete breakdown of the following:
 - a) A list of the services that you offer: (POTS, VoIP, DSL, cable, fiber, fixed wireless, wireless customers, etc.)
 - b) A list of the census blocks in which these services are offered. Please distinguish between the census blocks that are entirely served, from those that are only partially served.
 - c) The number of subscribers to each of these services broken down by census block.
 3. **Competitive Services:** You indicate that the “vast majority of existing DSL customers in California live in areas where another broadband option is available at higher speeds and at a comparable price, either from AT&T or from competitors or both.” Please provide a complete breakdown of the following:
 - a) How many DSL customers:
 1. How many customers do not have another broadband option available at a higher speed, price, and data cap?
 2. How many customers do have another broadband option available at a higher speed, price, and data cap from AT&T?
 3. How many customers have another broadband option available at a higher speed, price, and data cap from one of your competitors?
 - b) What does AT&T propose to do in communities like Comptche where there are no alternative providers?
 4. **Decommissioning Schedule:** Please provide a copy of your schedule for decommissioning DSL services.
 - a) Please identify the services and the census blocks where you have already decommissioned service.
 5. **Emergency Services:** Please provide details if there is any impact on 911 and 211 or any other emergency services during the migration of traffic.
 6. **VOIP:** You indicate that “customers who use AT&T’s VOIP service provisioned over their AT&T Internet service but does not apply to a customer’s traditional wireline voice (POTS) service.”
 - a) How many customers subscribe to this service? In which census blocks do they reside?
 - b) You make distinctions between different types of voice services based on the type of infrastructure the voice service is provided over. Please provide a list and description of each of these services.
 - c) If you are retiring your copper-based DSL network, how will you provide traditional wireline voice (POTS) service?

- d) How does disconnecting your customers' voice service comport with your carrier of last resort obligation – which is a technology-neutral obligation?
7. **Wireless Coverage:** You indicate that in “cases where no fixed broadband alternative is available from AT&T, and where AT&T has 3G or 4G wireless coverage, a mobile wireless home internet solution (AT&T Wireless Internet) will also be offered to anyone who requests DSL service within our traditional DSL footprint.”
- a) Please provide a list of the census blocks in which AT&T Wireless Internet is being offered. Please distinguish between the census blocks that are entirely served, from those that are only partially served.
 - a. How is mobile coverage determined? Signal strength models have been found to be unreliable. Residents that have unreliable, limited, or no mobile coverage may not benefit from this alternative service.
 - b. How do the terms, upload speed, download speed, data caps, and cost compare for your AT&T Wireless Internet, your DSL service, and your Fiber service?

Since you have already begun notifying your customers of this in August, and that you may begin to retire these services as soon as October 1, 2020, we request a complete and thorough response as soon as possible, or by October 5, 2020.

Please contact Communications Division Director Robert Osborn and my advisor Michael Mullaney if you have any questions.

Sincerely,



Marybel Batjer, President
California Public Utilities Commission

Cc: Mark Ghilarducci, Director of the Office of Emergency Services
Commissioner Liane M. Randolph
Commissioner Martha Guzman Aceves
Commissioner Clifford Rechtschaffen
Commissioner Genevieve Shiroma
Acting Executive Director Rachel Peterson
Communications Division Director Robert Osborn
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September 4, 2020

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Via Email

Dear President Batjer and Commissioners,

AT&T would like to provide you with an update of our actions related to AT&T Legacy ATM-based DSL service and AT&T ADSL-based services.

At AT&T we are continuing to improve and enhance our network, increase speeds, and invest in product offerings our consumers want. To that end we are investing heavily in technologies like fiber and wireless, and we are beginning the process of retiring low-demand, low-speed legacy services such as ATM-based digital subscriber line (DSL) service as of October 1, 2020. As part of this transition, all current AT&T DSL customers will be able to continue with their existing service or in some cases upgrade their service. This letter describes how we are managing this transition for our customers in a way that helps connect them to better and faster alternatives at comparable prices and makes them aware of their options and choices for service.

Legacy ATM-based DSL Service

The technology that drives Legacy DSL service is more than 20 years old, accounts for less than 5% of our internet base nationally, and we're experiencing a 22.3 percent year-over-year decline of the service. Due to Legacy ATM-based DSL service's extremely low customer demand, the current lack of manufacturing of replacement equipment for this service and overall maintenance challenges, after October 1, 2020 AT&T will no longer accept new orders for Legacy ATM-based DSL service.

To be clear, current DSL customers will be able to continue with their existing service or in some cases upgrade their service. The vast majority of existing DSL customers in California live in areas where another broadband option is available at higher speeds and at a comparable price, either from AT&T or from competitors or both.

AT&T

Customers living in areas where AT&T offers fiber-based internet will receive offers to upgrade to this newer internet service, which is discussed below.

In cases where no fixed broadband alternative is available from AT&T, and where AT&T has 3G or 4G wireless coverage, a mobile wireless home internet solution (AT&T Wireless Internet) will also be offered to anyone who requests DSL service within our traditional DSL footprint

ATM-based DSL service customers are a very small percentage of AT&T's fixed broadband customers in California. These customers will be receiving a bill page message customer notice in the August and September timeframe alerting them of the status of AT&T's Legacy ATM-based DSL service. Customers who live in areas that AT&T serves with fiber-based internet will also be receiving offers to upgrade their service, as discussed below.

Wholesale customers of AT&T ATM-based DSL service have received notice pursuant to contractual terms that no new orders or changes to existing service will be accepted.

DSL-Based Services in AT&T's Fiber Footprint

Some AT&T DSL customers (IPDSL and ATM-based DSL) live in areas where AT&T fiber-based internet service is also available. Because fiber-based service is far superior to their DSL-based service and because we can provide fiber at a comparable price, AT&T DSL customers who are within AT&T's fiber footprint will be given an offer to switch to fiber-based broadband services with no cost for installation, and at a comparable price to what they are paying for DSL. Fiber allows us to provide customers with more services, faster Internet speeds, and greater reliability.

We are starting the notification process to affected customers beginning in September and encouraging them to schedule a no-cost upgrade appointment as soon as possible. With the range of speeds available on AT&T's fiber-based service, customers may also choose to purchase even higher internet speeds.

Customers located within our fiber footprint that do not schedule an upgrade appointment by the notification deadline are ultimately subject to having their internet service disconnected once we begin to decommission the outdated equipment. This also applies to customers who use AT&T's VOIP service provisioned over their AT&T Internet service but does not apply to a customer's traditional wireline voice (POTS) service. Customers who are disconnected may call AT&T to get their internet service reconnected on our fiber-based services or choose another provider for their internet service. It is our goal to keep our customers connected, and that is why we are notifying our customers multiple times to

recommend switching to the far superior fiber-based services, and to make them aware that they must act or risk service disconnection. We will make every effort to contact customers to prevent a disconnection.

Again, to make this as easy as possible for our customers, we are offering to upgrade these customers at no additional cost.

We are committed to providing our customers with the best service possible. We continuously look for new ways to deliver higher speeds to more people where broadband is already available and for ways to deliver broadband service to those that don't have access to broadband.

Please contact me if you have any questions or comments.

Yours truly,

AT&T California

A handwritten signature in black ink that reads "Kessil Fenwick". The signature is written in a cursive, flowing style.

AVP - AT&T Regulatory

CC: Commissioner Liane M. Randolph
Commissioner Martha Guzman Aceves
Commissioner Clifford Rechtschaffen
Commissioner Genevieve Shiroma
Acting Executive Director Michelle Cooks
Director Robert Osborn
Rhonda Johnson, President AT&T CA
Jeff Luong, Vice President, AT&T Access and Construction Engineering