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April 1, 2014

<u>**Via Email**</u>
Nomi Bergman
Chair, Supporting the Transition to IP Working Group
Bright House Networks

  Re: *ATIS PSTN Transition Focus Group Assessment and
     Recommendations* (ATIS-I-0000034)

Dear Ms. Bergman:

In light of the work that has been recently initiated within the Federal
Communications Commission's (FCC) Technical Advisory Committee (TAC)
regarding the transition to IP, the Alliance for Telecommunications Industry
Solutions (ATIS) has been asked to share its *PSTN Transition Focus Group
Assessment and Recommendations* (*PSTN Transition Report*) that was published
in early 2013.

As you know, ATIS is a global standards development and technical planning
organization that leads, develops and promotes worldwide technical and
operations standards for the ICT industry. Nearly 600 industry subject matter
experts work collaboratively in ATIS' open industry committees. Technical,
operational, and business priorities are also examined by ATIS through its
Technology and Operations (TOPS) Council, a group established by the ATIS
Board of Directors to identify and address the ICT ecosystem's needs through
focused, expedited efforts.

The *PSTN Transition Report* evaluates the impact of the transition to All-IP and
makes recommendations for work to enable the transition. Four areas of network
evolution were assessed: (1) application services; (2) access; (3) transport; and
(4) numbering. The report provides conclusions and recommendations for each
of these areas, along with appendices containing the supporting detailed analysis.

The following sections may be of particular interest to the TAC Transition to IP
Working Group:
- Application Services: This section analyzes each application in multiple
  dimensions and considers both the current and future state of the PSTN and
  of these applications, as well as regulatory, policy, and standards
  implications. Based on the analysis, the current set of PSTN applications
  available today were placed into three categories: (1) sunset services; (2)
  transitional services; or (3) successor network services.

- Access: This section investigates the characteristics and limitations of PSTN access networks to identify the characteristics that might need to be carried forward as the network transitions to All-IP. The key concerns identified by this analysis were: the stranding of customer premises equipment (CPE), implications of loss of central office power, and robustness.

This *PSTN Transition Report* is being made available on a complimentary basis to participants in the TAC Transition to IP Working Group to assist them in the completion of the Working Group's mission. If there are others who would like to receive copies of this document to assist in the TAC's efforts regarding the IP transition, please let me know and we will endeavor to make it available. ATIS would also be pleased to offer a briefing to the Working Group on this *PSTN Transition Report* or on related All-IP transition work underway in ATIS.

If there are questions, please let me know.

Sincerely,

Jim McEachern
ATIS Senior Technology Consultant

cc: John Barnhill, FCC TAC Working Group Member, GENBAND
        Walter Johnston, Chief of the Electromagnetic Compatibility Division
        Julius Knapp, Chief of the Office of Engineering and Technology