

July 25, 2016

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission of the District of Columbia
1325 G Street, NW, Suite 800
Washington, DC 20005

**RE: RM27-2016-01 In the Matter of the Commission's Investigation into the Rules
Governing Local Exchange Carrier Quality of Service Standards for the District**

Dear Ms. Westbrook-Sedgwick:

The Communications Workers of America ("CWA") respectfully submits these comments in response to the Public Service Commission of the District of Columbia's ("DC PSC" or "Commission") standby back-up battery Notice of Proposed Rulemaking ("NPRM").¹ CWA represents more than 500 employees in the District of Columbia who have a deep interest in this proceeding as workers and consumers.

Unlike line-powered legacy circuit-switched telephone service, IP-enabled and wireless voice services do not work when commercial power fails. While new communications technologies provide many benefits, the lack of line-power poses a threat to public safety at times of commercial power failure. In this proceeding, the DC PSC recognizes the danger of losing voice telephony service when commercial power fails. CWA strongly supports the Commission's proposal to protect public safety by requiring all telecommunications service providers that offer regulated local exchange service on facilities that are not line-powered to supply customers with a back-up power unit capable of delivering at least 25 hours of back-up power. CWA also supports the Commission's proposal that the back-up power unit, batteries, and replacement batteries must be provided free of charge. This will ensure that cost is not a barrier to ensuring that everyone has access to voice telephone service during a commercial power outage.

The DC PSC's proposed disclosure and notification requirements closely track those recently adopted by the Federal Communications Commission.² The DC PSC's proposal requires notification at the point of sale and thereafter annually with information regarding the standby back-up power unit offered, service limitations, replacement and cost, expected backup power duration, proper usage and storage, self-testing and monitoring, and warranty details. It is the experience of CWA-represented technicians that customers are most focused on the back-up battery issue at the time the new equipment is installed. Therefore, CWA urges the DC PSC to build upon the proposed disclosure and notification requirements by also requiring disclosure and notification at the time of installation of the new technology. The Commission should also require that the disclosure and notification information be

¹ See Public Service Commission of the District of Columbia, *Notice of Proposed Rulemaking*, In the Matter of the Commission's Investigation into the Rules Governing Local Exchange Carrier Quality of Service Standards for the District, RM 27-2016-01 (Rel. Apr. 15, 2016).

² Federal Communications Commission, *Report and Order*, Ensuring Continuity of 911 Communications, PS Docket No. 14-174 (Rel. Aug. 7, 2015).

provided on all marketing and other materials to ensure that consumers are fully informed and aware of the changes in power capability associated with the new technology.

CWA commends the Commission for its leadership in proposing strong back-up power protections, so that those who live and work in the District will not be left without vital voice telephony service the next time a major storm downs power lines in our region. CWA urges the Commission to move forward expeditiously to adopt its proposed rule, with the minor change we suggest.

Respectfully Submitted,

Vincent Trivelli

On Behalf of Communications Workers of America, AFL-CIO