

### Plain Old Telephone Service (POTS) Shutdown Strategy

#### January 2021

Replacement Strategies for Copper Telephone Service (POTS Sunset). In 2017, the FCC gave the go-ahead to telecom providers to sunset their Plain Old Telephone Service (POTS) lines. In many states, the change has already begun. In others, the retirement of copper lines is just around the corner at Apr 20, 2022

Telecom carriers are accelerating the transition from PSTN (Public Switched Telephone Network) to all-IP communications. Traditional voice services usually routed through the fixed-line analog network are then routed through a voice over IP digital network. Rather than using PSTN, calls are transferred over high-bandwidth internet links reaching home.

The main reason for this change is that most carriers do not want to manage a twofold infrastructure with analog and digital equipment when a full digital architecture can offer at least the same level of service for end-users. Consequently, telecom equipment manufacturers are focusing on digital technology and are phasing out analog equipment making it more and more difficult for any carrier to maintain its analog infrastructure. Since digital technology can bring more services, telecom operators also prefer to invest in technology that may increase their average revenue per user (ARPU). As technology advances into the next generation, some key historical events took place that paved the way for the improvement to Life Safety equipment connectivity. This document serves as a reference and timeline that made it all possible. Please use this as a reference only.

Federal Communications Commission (FCC)
November 29, 2017, the FCC released a Report and
Order (R&O), Declaratory Ruling, and Further
Notice of Proposed Rulemaking (Further Notice)
addressing (1) retirement of landline copper lines and
(2) replacement of legacy services (i.e., traditional
Plain Old Telephone Service, also known as "POTS")
with next-generation service.

The Federal Communications Commission took a first but critical step toward retiring both the analog network and the obsolete rules for overseeing it. At

the request of some of the remaining wireline companies, the FCC has invited carriers to submit proposals for technical and service experiments that will test how the retirement of the analog network can be completed as quickly as possible, without imposing undue cost on those who still rely on it. Reference:

https://www.fcc.gov/fcc-adopts-new-technology-transitions-rules-and-invites-comment-proposed-elimination-outreach

CA Assembly Bill (AB) 2395

An act to add Section 711 to the Public Utilities Code, relating to telecommunications.

February 18, 2016, the bill would require a telephone corporation that is transitioning to IP enabled services and networks to complete a customer education and outreach program before seeking to withdraw traditional circuit-switched and other legacy telephone services. The education and outreach program would be required to explain the transition from legacy public switched telephone network services regulated by the commission to IP enabled services, the benefits and advantages of IP enabled services, a description of the advanced services available to consumers, and information regarding the projected timeframes for the transition, including that withdrawal of any voice grade single-line telephone service will not take place prior to January 1, 2020

Reference:

http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M 161/K671/161671348.PDF

National Fire Protection Association (NFPA) section 72 2019 version of the Signaling Code.

NFPA 72 - Commentary The purpose of 26.6.4.1.4 is to provide the DACT with two reasonably reliable means of connecting to the DACR. Note that the Code has no jurisdiction over utility-provided services such as telephone services. Thus, the Code must rely on the traditionally accepted inherent reliability of all such utility provided services. See also the commentary and the Closer Look feature following A.26.6.4.1.1.



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Due to the decreased reliability of both traditional and MFVN (Managed Facilities-Based Voice Network) -based PSTNs (Public Switching Telephone Networks), this requirement was revised for the 2013 edition of the Code to no longer permit the use of a second telephone line (number) as the second transmission means for a DACT. Several of the other choices available in previous editions of the Code for the second transmission means were also removed, either because they are no longer available or were never actually used, such as derived local channel, integrated services digital network (ISDN), and private microwave radio. The traditional cellular telephone service that had to dial a number is also no longer permitted. However, digital cellular radio utilizing ubiquitous VoLTE wireless networks can meet the performance-based requirements.

# 26.6.3.<u>https://docs.fcc.gov/public/attachments/DOC-347790A1.docx</u>

On November 29, 2017, the FCC released a Report and Order (R&O), Declaratory Ruling, and Further Notice of Proposed Rulemaking (Further Notice) addressing (1) retirement of landline copper lines and (2) replacement of legacy services (i.e., traditional Plain Old Telephone Service, also known as "POTS") with next-generation service, such as Voice over Long Term Evolution (VoLTE).

FCC Forbearance Order 19-72A1 Regarding Analog POTS Lines The Sunset of Copper POTS ("Plain Old Telephone Service") Lines FCC order 19-72A1 (issued August 2, 2019) has officially granted telecommunications carriers permission to abandon outdated, degrading copper POTs lines. Per the order, carriers are not only released from maintaining this critical part of the communications infrastructure they also are no longer required to make this important element of telecommunications service available to consumers. Impact of the Order The change has already begun. As a result of the Order, carriers are increasing pricing for existing POTS lines by 75% - 250% in a concerted effort to force customer migration off of the outdated, and literally, crumbling, POTS line infrastructure. Some customers are receiving communication from their carriers informing them that their current POTS line services

will no longer be available after "X" date. In any case, the FCC Order mandates that customers and resellers of POTS line services must transition to an alternative service on or before August 2, 2022.

Figure 1.1.1 - MAP of Telecommunications Companies complying with the FCC Shutdown Schedule for August, 10, 20222.



Figure 1.1.2 - MAP of Telecommunications Companies (MPOE, CLEC, LEC) HQ locations with plans to discontinue Frame Relay and Centrex Lines of Telephone Service by the end of 2021.



Purple = AT&T Landline Services
Blue = Verizon Landline Service
Green = BellSouth Landline Service
Pink = Ameritech Landline Service
Red = Bell Atlantic Landline Service

Looking up to see what phone companies have filed to turn off Analog Telephone Services: <a href="https://www.fcc.gov/general/domestic-section-214-discontinuance-service">https://www.fcc.gov/general/domestic-section-214-discontinuance-service</a>

For information on the products and services offered by Manley Solution to solve the transition of POTS to VoLTE can be found by <u>clicking here</u>