

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
Policies and Rules Governing)	RM-11358
Retirement Of Copper Loops by)	
Incumbent Local Exchange Carriers)	
)	
Special Access for Price Cap Local)	WC Docket No. 05-25
Exchange Carriers)	
)	
AT&T Corporation Petition for)	RM-10593
Rulemaking to Reform Regulation of)	
Incumbent Local Exchange Carrier)	
Rates for Interstate Special Access)	
Services)	

REPLY COMMENTS OF THE JOINT STATES

The Joint States comprised of the Idaho Public Utilities Commission, the Michigan Public Service Commission, the Minnesota Department of Commerce, the Minnesota Public Utilities Commission, the Nebraska Public Service Commission, the Pennsylvania Public Utility Commission and the Washington Utilities and Transportation Commission (Joint States) respectfully submit these reply comments in response to the Federal Communications Commission’s (FCC or Commission) Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking (FNPRM) in the above-captioned proceedings released on August 7, 2015. Reply comments to the FNPRM are due November 24, 2015.

The FNPRM seeks comment on “specific criteria for the Commission to use in evaluating applications to discontinue retail services pursuant to section 214 of the

Act.”¹ The Joint States believe that while establishing clear standards is important, it is essential that the criteria preserve fundamental features of the legacy service such as connection quality and persistence, 9-1-1 access service, and services for persons with disabilities. The transition should maintain consumers’ access to reliable and affordable communications services and support those competitive services that rely on the underlying facilities. The Joint States offer the following reply comments regarding the specific questions discussed in the FNPRM.

Establishing Clear Standards to Streamline Transition to an All-IP Environment

The FCC has proposed speeding up the discontinuance application process by offering carriers that meet certain criteria the opportunity for an automatic grant pursuant to section 63.71(d) of the Commission’s rules. The FCC proposes eight criteria: (1) network capacity and reliability; (2) service quality; (3) device and service interoperability, including interoperability with vital third-party services (through existing or new devices); (4) service for individuals with disabilities, including compatibility with assistive technologies; (5) public safety answering point (PSAP) and 9-1-1 service; (6) cybersecurity; (7) service functionality; and (8) coverage.² The Joint States support establishing clear criteria for determining an

¹ FNPRM pg. 7, par 7:
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

² FNPRM pg. 109, par 208:
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

adequate substitute service and believe that limiting uncertainty will encourage innovation and advance the public interest.

The Joint States support allowing third party services to be considered when evaluating the adequacy of replacement services for carriers seeking section 214 discontinuance authority. However, necessary precautions must be taken to ensure future reliability, functionality, affordability and long-term viability of such third-party service that will replace the currently available integrated “affordable, reliable, ubiquitous legacy service.”³ The Joint States agree with the Michigan Public Service Commission (MPSC) that applications that use more than one alternative service to fulfill the criteria have the potential to cause public safety and consumer protection concerns.⁴ These applications demand a more critical review and may need to be removed from the automatic grant process. Additionally, as supported by the MPSC, it may be helpful to have a transition plan in place “to facilitate the customer’s move to the new carrier and ensure that there is not a disruption in service”.⁵

The Joint States while supporting the idea of general criteria, believe that local considerations such as demographics and geography may necessitate referral to the states. For example, the comments of the California Public Utilities Commis-

³ NASUCA’s Technology Transition comments pg. 12,
<http://apps.fcc.gov/ecfs/document/view?id=60001331092>

⁴ MPSC’s Technology Transition comments pg. 3,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

⁵ MPSC’s Technology Transition comments pg. 3,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

sion (CPUC) underline the significance of state-specific carrier of last resort obligations (COLR) for the evaluation of such technology transitions.⁶ Local testing, proposed by the MPSC, would serve to ensure the viability of the replacement service.⁷ Additionally, the Joint States agree with the Pennsylvania Public Utility Commission (Pa. PUC) that “any criteria the Commission establishes... should not violate or obfuscate independent state law”.⁸

Network Capacity and Reliability

The Joint States believe that an evaluation of network capacity and reliability should be part of any adequate substitute test. The Joint States agree with the Pa. PUC that any evaluation should include the following measures: 1) communications are routed to the correct location; 2) connections are completed; 3) connection quality and reliability do not deteriorate under stress; and 4) connection setup does not exhibit noticeable latency.⁹ As pointed out by the National Association of State Utility Consumer Advocates (NASUCA), “reliable service should also involve network design that allows for continued completion of calls over diverse routes when facilities are damaged, and during storms and emergencies”.¹⁰

⁶ CPUC’s, Technology Transition comments pg. 6. The CPUC also points out the need for verifying the actual existence of comparable services (not via web-site advertising) and their availability at specific geographic locations as the discontinued service. *Id.* pg. 8.

⁷ *Id.* pg. 4

⁸ Pa. PUC’s Technology Transition comments pg. 4, <http://apps.fcc.gov/ecfs/document/view?id=60001330986>

⁹ Pa. PUC’s Technology Transition comments pg. 8, <http://apps.fcc.gov/ecfs/document/view?id=60001330986>

¹⁰ NASUCA’s Technology Transition comments pg. 6,

Service Quality

The Joint States take the position that it is important to, at a minimum, maintain current service quality standards as carriers' transition to a substitute or alternative service and support its inclusion in the criteria. As recognized in the FNPRM, there are states where the state utilities commission either has not established service quality standards or lacks authority to do so.¹¹ The Joint States take the position that minimum standards and reporting requirements should be established as a result and support the MPSC's proposed requirements.¹² Furthermore, the Joint States agree with the Pa. PUC position "that the Commission must recognize independent state law and should allow the state commissions to evaluate an ILEC's technological transition to ensure it complies with any applicable state requirements."¹³

<http://apps.fcc.gov/ecfs/document/view?id=60001331092>

¹¹ FNPRM pg. 113, par. 218,

http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

¹² MPSC's Technology Transition Comments Pgs. 4-5, "Standards and reporting requirements must be established to address premium thresholds for call quality, responding to and resolving complaints, protection from false and misleading advertisements and offerings, ensuring that 911 services work properly and that callers' locations are identifiable, as well as requiring that service standards are established and enforced for installation, repairs and requests for disconnections."

<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

¹³Pa. PUC's Technology Transitions comments, pg. 9. *See also* National Association of Regulatory Utility Commissioners (NARUC) Technology Transition comments, pg. 5.

Any service quality standards also need to take into account not only the needs of residential customers, but all customers in the geographic area affected by the transition to a new technology. This includes business and enterprise customers as well as critical facilities such as hospital, governmental institutions and public utility systems, including those involved in commercial electric power generation, transmission, and distribution.

As the Edison Electric Institute notes “Utilities migrating to shared IP infrastructure have at times experienced quality of service issues, as uplink and downlink capacity at individual cell towers can vary significantly, causing a loss or delay of signal. Capacity and latency of shared IP infrastructure can also vary to great degrees based on time of day, or events that might occur. Replacement services employed by carriers should have high quality of service levels, to ensure that utilities’ critical communications are not interrupted.”¹⁴

The Edison Electric Institute particularly focuses on the requirements of low latency that can be “no more than 10 milliseconds” so that relevant teleprotection systems can timely and properly isolate and manage faults in integrated and interlinked electric power generation, transmission, and distribution systems. Similarly, according to the Edison Electric Institute, jitter (variance in latency) “also needs to be very low (approximately 1-4 milliseconds) in order to tightly

¹⁴ Edison Electric Institute comments, pg. 7
<http://apps.fcc.gov/ecfs/comment/view?id=60001305290>

synchronize the comparison measurements taken at opposite ends of” transmission lines.¹⁵

State utility commissions have a fundamental regulatory oversight role over the safe and reliable provision of commercial power by public energy utilities in their respective jurisdictions. The safe and reliable provision of commercial electric power is also part and parcel of fundamental public health and safety safeguards and relevant responsibilities of the states. In the new era of technology transition, telecommunications networks are dependent on the availability of reliable commercial electric power. This interdependence between telecommunications networks and services and commercial electric power supplies mandates that the Commission will need to be careful on how certain technology transition quality of service standards (e.g., latency and jitter) can affect the operations of critical infrastructure industries such as those of integrated and interlinked commercial electric power grids.

Device and Service Interoperability

The Joint States support adopting a criterion requiring carriers to demonstrate that the replacement service provides at least as much interoperability as the service being retired.¹⁶ The telephone network supports numerous devices and services. As stated in the FNPRM, “the record is already replete with

¹⁵ Edison Electric Institute comments, pg. 5. *See also* National Rural Electric Cooperative Association comments, pg. 3-4.

¹⁶ FNPRM pg. 114, par. 219,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

examples...”¹⁷ The Joint States take the position that it would be unduly burdensome and potentially detrimental if consumers were prevented from using their devices and/or utilizing services due to a lack of interoperability. The Joint States agree with the MPSC and the CTC report cited in the FNPRM that carriers should be required to conform to standard modem technology and the International Telecommunications Union (ITU) T.38 standard as well as lab testing as a means of verifying that the new technology conforms to the appropriate criteria.¹⁸

Service for Individuals with Disabilities

The Joint States agree with the Commission that “the importance of ensuring that consumers with disabilities can utilize assistive technologies over communications networks is indisputable,”¹⁹ and should therefore be included in the criteria. The Joint States also agree with the Commission’s tentative conclusion that a carrier seeking a section 214 discontinuance should be required to demonstrate that “its replacement service or the alternative services available from other providers allow at least the same accessibility, usability, and compatibility with assistive technologies as the service being discontinued.”²⁰

¹⁷ Id. pg. 114, par. 220

¹⁸ MPSC’s Technology Transition comments pg. 5,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

¹⁹ FNPRM pg. 115, par. 222,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

²⁰ FNPRM pg. 116, par. 222,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

As noted by the Disability Coalition for Technology Transition (Disability Coalition), affordability should also be considered as part of this criterion.²¹ The examples provided by the MPSC and the Disability Coalition highlight some of the concerns regarding affordability that should be taken into consideration.²² For example, the CPUC suggests that the transitioning provider should offer certain alternatives to disabled subscribers including “financial assistance and information on a source from which the subscriber can purchase such new” and compatible equipment.²³ Additionally, as mentioned by the MPSC, there may be compatibility issues between TTY devices and the IP network that may need to be addressed by the FCC.²⁴ These concerns are also echoed by the CPUC, and the CPUC suggests that the Commission should not “set an end date *now* for terminating TTY text service.”²⁵

²¹ Disability Coalition for Technology Transition’s comments pg. 6,

<http://apps.fcc.gov/ecfs/document/view?id=60001331014>

²² MPSC’s Technology Transition comments pg. 6, “Additionally, if the customer must purchase new equipment (a smart phone, etc.) to accommodate the new service, the issue of who will be responsible for the cost needs to be addressed.”

<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

Disability Coalition for Technology Transition’s comments pg. 6, “As an example, if the consumer was using a standard analog line to access the telephone network with their TTY or Captioned Telephone, the consumer should not be required to have to pay for both a “phone line and Internet service” to access the solution if their solution now only requires the cost of one service – the phone line.”

“Additionally, a consumer transitioning from a TTY to VRS should not be prevented from doing so due to the unaffordability of Internet service in comparison to a phone line.” <http://apps.fcc.gov/ecfs/document/view?id=60001331014>

²³ CPUC’s Technology Transition comments, pg. 11.

²⁴ MPSC’s Technology Transition comments pg. 6,

<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

²⁵ CPUC’s Technology Transition comments, pg. 13 (emphasis in the original). The CPUC points out that its “telecommunications equipment distribution program does not currently distribute IP-compatible TTY equipment.” *Id.*

The Joint States agree with the MPSC that “as part of the transition to substitute or alternative services it would be beneficial to include a requirement for real time text (RTT) services.”²⁶ The Joint States take the position that in addition to carriers providing a plan to ensure customers have the necessary equipment and knowledge to transition to RTT, it is important that carriers demonstrate that RTT is interoperable with other services. As discussed by the Disability Coalition, RTT needs to be fully compatible with the PSAPs, 911/E911/NG911 access, and TTY users still need to be able to communicate with those PSAPs.²⁷ The Joint States echo the concerns raised by the Disability Coalition regarding the need for RTT to remain reliable during commercial power outages.²⁸ Also, as pointed out by the MPSC, the effect of RTT on the Federal Telecommunications Relay Service Fund (TRS), and state TTY laws, device distribution programs to eligible persons with disabilities, and TRS funds will also need to be determined prior to the transition.²⁹

The Joint States take the position that high definition (HD) voice offers numerous advantages to hard of hearing customers and should be considered as part of the transition to IP services. The Joint States agree with the Pa. PUC that a

²⁶ Id.

²⁷ Disability Coalition for Technology Transition’s comments pg. 9, <http://apps.fcc.gov/ecfs/document/view?id=60001331014>

²⁸ Disability Coalition for Technology Transition’s comments pg. 11, <http://apps.fcc.gov/ecfs/document/view?id=60001331014>

²⁹ MPSC’s Technology Transition comments pg. 7, <http://apps.fcc.gov/ecfs/document/view?id=60001330920>

trial period may be necessary to ensure the service is functioning reliably and as expected prior to any all-out migration.³⁰

PSAP and 9-1-1 Services

The Joint States agree with the Commission's tentative conclusion that one of the criteria should be to require the carrier to demonstrate that the substitute or alternative service complies with applicable state, Tribal, and federal regulations regarding the availability, reliability, and required functionality of 9-1-1 service.³¹ The Joint States take the position that the substitute or alternative service should provide as good or better service as compared to the existing service it is replacing, including "a dispatchable address for automatic location identification (ALI)" and relevant automatic number identification (ANI) data base information.³² As discussed by the Pa. PUC and the MPSC, carriers also need to ensure at least a set minimum amount of backup power during commercial power outages so that customers will be able to make essential calls, including 911/E911 emergency calls, and appropriately educate their end-user consumers.³³

³⁰ Pa. PUC's Technology Transition comments pg. 12,
<http://apps.fcc.gov/ecfs/document/view?id=60001330986>

³¹ FNPRM pg. 117, par. 225,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

³² CPUC's Technology Transition comments, pg. 15.

³³ MPSC's Technology Transition comments pg. 8,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>
Pa. PUC's Technology Transition comments pg. 13,
<http://apps.fcc.gov/ecfs/document/view?id=60001330986>

The Joint States also agree with the CPUC positions to the effect that Section 214 discontinuances and technology transitions should be properly coordinated with affected PSAPs since “[p]rovisioning and migrating communications connectivity to PSAPs requires extensive coordination among many agencies and providers to ensure that multiple types of communications are not interrupted.”³⁴ Furthermore, the CPUC offers the sound advice that “[t]esting of new solutions or connectivity is important because even apparently small changes could have a significant impact” for PSAP operations.³⁵

Communications Security

The Joint States agree with the Commission’s tentative conclusion that a carrier should demonstrate, as part of any adequate substitute test, that the substitute or alternative service offers comparably effective protection from network security risks, and therefore possesses comparable communications security, integrity, and reliability.³⁶ The Joint States agree with Public Knowledge that carriers should utilize industry best practices to combat network vulnerabilities and those mitigation efforts should be presented as part of any section 214 applications.³⁷ As communications security is an ongoing concern with ever-

³⁴ CPUC’s Technology Transition comments, pg. 15.

³⁵ CPUC’s Technology Transition comments, pg. 15-16.

³⁶ FNPRM pg. 118, par. 227

http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

³⁷ FNPRM pg. 118, footnote 700,

http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

changing risks, the Joint States agree with the Pa. PUC that an annual certification process, including a written physical security and cyber security plan, may need to be considered.³⁸

Service Functionality

The Joint States agree with the Commission's tentative conclusion that one of the criteria should require carriers to demonstrate, as part of its 214 application, that any replacement service allows for service functionalities similar to those of the service for which the carrier seeks discontinuance authority.³⁹ The Joint States agree with the MPSC that service functionality should include all services offered, whether or not those services are utilized.⁴⁰ Furthermore, the Joint States agree with the Pa. PUC position that there should be consideration whether the functionalities of the discontinued retail or wholesale services are "the same or substantially similar" with those of the replacement services.⁴¹

Coverage

The Joint States agree with the Commission's tentative conclusion that one criterion of any adequate substitute test should require carriers to demonstrate that the substitute or alternative service will remain available to those customers to

³⁸ Pa. PUC's Technology Transition comments pg. 15,
<http://apps.fcc.gov/ecfs/document/view?id=60001330986>

³⁹ FNPRM pgs. 119-220, par 229,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

⁴⁰ MPSC's Technology Transition comments pg. 10,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

⁴¹ Pa. PUC's Technology Transition comments, pg. 16.

whom the legacy service had been available.⁴² The Joint States do not believe that it is appropriate to adopt a *de minimis* threshold based on percentage of the prior population or geographic area reached, or any other measure for which loss of coverage is tolerable, as this approach would contradict the principles of universal service and may be contrary to COLR obligations that are imposed under independent state law.⁴³ The Joint States agree with the MPSC that customers should be able to fully access the service within the home or business: coverage should be on par with the legacy wireline service.⁴⁴

Customer Education

The Joint States agree with the Commission's proposal to require carriers to provide a customer education and outreach plan as part of their section 214 application.⁴⁵ Additionally, the Joint States agree with the Pa. PUC's proposal that consumer education and outreach plans be submitted to state commissions for review prior to transitioning to the substitute or alternative service to ensure that state commissions are prepared to assist consumers with concerns or issues.⁴⁶ The CPUC also urges a collaborative approach between the Commission, the states, and

⁴² FNPRM pg. 120, par. 231,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

⁴³ NASUCA's Technology Transition comments, pg. 10.

⁴⁴ MPSC's Technology Transition comments pg. 10,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

⁴⁵ FNPRM pg. 121, par 233,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

⁴⁶ Pa PUC's Technology Transition comments pg. 19,
<http://apps.fcc.gov/ecfs/document/view?id=60001330986>

other interested stakeholders for the development of necessary “materials and disclosure rules to ensure that providers adequately notify consumers in addition to taking steps to achieve outreach and consumer education.”⁴⁷

Other Criteria

The Joint States strongly agree with the positions of the Nebraska Public Service Commission (NPSC), the MPSC, and NASUCA that affordability should be considered as a criterion in any adequate substitute test. Affordability is a factor affecting not only residential customers but also business and enterprise customers as well as governmental institutions that rely on various functionalities of the existing and evolving networks. The Commission tentatively concluded not to include affordability in its criteria in the section 214 process because “the evaluation process in this context should focus on the nature of the service and because cost is not part of the equation in determining whether an available alternative service constitutes an adequate substitute for the service sought to be discontinued.”⁴⁸ The Joint States agree with the MPSC that lack of affordability and comparable pricing of a particular substitute or alternative service could lead to *de-facto* discontinuance of that service by customers.⁴⁹

⁴⁷ CPUC’s Technology Transition comments, pg. 17.

⁴⁸ FNPRM pg. 12, par. 234,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

⁴⁹ MPSC’s Technology Transition comments pg. 12,
<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

Section 214(a) Discontinuance Process

The Joint States support advanced notification provided to customers to ensure they have adequate time to plan for the transition to substitute or alternative services. Requirements should be calculated to ensure end-users have sufficient time to determine the impact of the transition (effect on devices and services, need for backup power, etc.), research other options, and provide any comments to the Commission.

The Joint States do not oppose allowing email notification as part of the discontinuance process. However, the Joint States agree with AARP, that email notification would only be appropriate for consumers that had previously consented to and are currently receiving notifications via email.⁵⁰

Section 214(a) Discontinuance Notice to Tribal Governments

The Joint States support the Commission's tentative conclusion to extend notice to Tribal governments regarding a section 214 discontinuance, reduction or impairment of a service and support revising rule 63.71(a) to include such notice.⁵¹

Copper Retirement Process - Good Faith Communication Requirement

The Joint States take the position that the Commission should provide specific objective criteria with which to evaluate the requirement that incumbent

⁵⁰ AARP's Technology Transition comments pg. 27,
<http://apps.fcc.gov/ecfs/document/view?id=60001330871>

⁵¹ FNPRM pg. 124, par. 240,
http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

local exchange carriers (ILECs) work in good faith with interconnecting entities.⁵² The Joint States support objective criteria as this will hasten and improve the transition process by ensuring the parties are aware of their respective rights and obligations in the context of wholesale interconnection arrangements under applicable federal and state law. In addition, the Joint States agree with the Commission's proposal that the date of the copper retirement be extended 90 days for failing to meet the good faith communication requirement.

Termination of Interim Reasonably Comparable Wholesale Access Condition

The Joint States take the position that commercial wholesale platform services should be preserved and continued after the transition to substitute or alternative services. As described by the MPSC and NPSC, these services are utilized by numerous customers.⁵³ The Joint States agree with the MPSC that “the FCC should require that wholesale access continue at least until a Commission proceeding can assess the impact to end users and competition due to the transition of services.”⁵⁴

⁵² FNPRM pg. 124, par 241, http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0925/FCC-15-97A1.pdf

⁵³ MPSC's Technology Transition comments pg. 14 “According to the most recent report issued by the MPSC on “The Status of Telecommunications Competition in Michigan” 8.8%, or over 80,000 of the CLEC lines reported to the MPSC as of 12/31/2013 are served using commercial wholesale platform services.

<http://apps.fcc.gov/ecfs/document/view?id=60001330920>

NPSC's Technology Transition comments pg. 3, “Of the 699,118 lines reported, there were only 63,276 lines in service, or 9.1 percent of Nebraska access lines without competitive alternatives.” <http://apps.fcc.gov/ecfs/document/view?id=60001331008>

⁵⁴ MPSC's Technology Transition comments pg. 14,

Conclusion

The Joint States appreciate the opportunity to provide comments on the FNPRM and look forward to working with the Commission and providers to make the transition to new technology positive and beneficial to customers.

Respectfully submitted,



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