

THE SENATE
STATE OF NEW YORK



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August 19, 2013

Jeffrey Cohen
Acting Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Matter No. 13-C-0197 (Proposed Amendments to Verizon, New York, Inc. Tariff PSC No.1)

Dear Acting Secretary Cohen:

A reliable and properly functioning telecommunications system device can mean the difference between life and death. It can also serve as the difference between business success and failure. In this proceeding Verizon is seeking the Commission's permission to end its proven and dependable wire line service and instead only offer a wireless service in a designated area. I have serious concerns about the impacts of such a proposal. Verizon's request raises issues relating to public safety and consumer choice. In addition, this change could also impact businesses and increase the cost to do business in New York State.

I am concerned that embracing Voice Link as an adequate substitute for Verizon's wireline service is premature. As expressed in consumers' complaints, Voice Link service is not currently as reliable as telephone service delivered over a properly maintained copper or fiber-optic network, since wireless signal is often weak, spotty, or overburdened by other network traffic. This could be a significant problem at the time of an emergency.

Switching to Voice Link from copper wires also raises serious public safety issues that must be addressed. Voice Link is less reliable during power outages than copper-based wireline service and this increases customers' vulnerability to power outages. Despite the battery backup feature of Voice Link, if utility electric power is interrupted, customers would be limited to two hours of talking time. This would be inadequate during prolonged outages. In just the last two years, in the aftermath of Hurricane Irene and Superstorm Sandy, New Yorkers experienced how their lives can be disrupted and their ability to cope in emergencies made more difficult without working telecommunications.

Another public safety concern is that because of the nature of the product as a box that can be moved from location to location, is that 911 calls may result in inaccurate information for emergency service providers. As a result, a relocated box may transmit an incorrect address

when the consumer is making 911 calls causing first responders to be sent to the wrong location when responding to an emergency call.


In addition to the public safety concerns, New York residents and businesses who are forced to accept VoiceLink service will lose choices that are available to those who have copper line service. This proposal could cause a major increase in the cost of services to people and in effect create a monopoly for television services for some companies.

It is my understanding that customers are unable to obtain fax and DSL via VoiceLink. This is unacceptable. Verizon must be able to provide a replacement for these services before any discussion of forcing the change to wireless is considered.

The proposal is also harmful to businesses. Businesses – and particularly the small-to-medium sized business that are the engines of the economy in many parts of the state – will lose critical capabilities. In addition to the loss of fax and DSL capability, Voice Link does not support point-of sale credit card devices that work over ordinary wired dial-up access lines. Additionally, the above-mentioned reliability issues can lead to lost opportunities for businesses and significantly hamper their competitiveness. In today's business world you are expected to respond quickly and efficiently, unreliable phone service makes this impossible.

I urge you to withhold abandoning copper line networks. These decisions have broad public impact for all of New York State telecommunications, and the proposal raises serious concerns relating to public safety and services to consumers and businesses. As such, I respectfully ask that you reject Verizon's petition.

Sincerely,



Senator Terry Gipson
New York State Senator, 41st District