

**Testimony of Catherine Avgiris  
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**BEFORE THE  
UNITED STATES HOUSE OF REPRESENTATIVES  
COMMITTEE ON ENERGY AND COMMERCE  
SUBCOMMITTEE ON TELECOMMUNICATIONS AND THE INTERNET**

*Issues in Emergency Communications:  
A Legislative Hearing on H.R. 3403,  
the 911 Modernization and Public Safety Act of 2007*

**September 19, 2007**

Good morning Mr. Chairman and Members of the Committee. Thank you for the opportunity to testify today on H.R. 3403, the *911 Modernization and Public Safety Act of 2007*.

**I. Introduction**

My name is Catherine Avgiris and I am the Senior Vice President and General Manager of Voice Services for Comcast Corporation. I am currently responsible for overseeing all aspects of Comcast's voice business, including the roll-out of our IP-based voice service known as Comcast Digital Voice.<sup>®</sup>

Today, our voice service is available in more than 70 markets reaching more than 37 million homes nationwide. Already more than three million customers are enjoying the savings from our competitive offering and, as a result of this phenomenal consumer demand, we are now the largest facilities-based competitive provider of residential voice service in the United States. We also serve more than 24 million cable customers and more than 12 million high-speed Internet customers.

Comcast Digital Voice is a key driver behind the success of our "Triple Play" bundle, which offers consumers the advantage of receiving digital voice, cable, and high-speed Internet services from one company, for one low price, with innovative features. Also, in addition to enhancing voice competition and delivering significant savings for consumers, Comcast Digital Voice has helped spur adoption of broadband services throughout the nation.

In making the decision to offer competitive voice services, we were determined to give our customers the quality, safety, and reliability that are essential to meeting their needs, and essential to Comcast's ability to give consumers a true choice of providers. For that

reason, we designed Comcast Digital Voice to include the same 911 and E911 functionalities that customers expect from traditional telephone providers. Yet, unlike some other IP-based voice services, Comcast Digital Voice calls originate and travel over our privately managed network and not the public Internet – and we’ve spent more than \$45 billion to make that network robust and reliable.

## **II. The Vital Role of 911/E911 and the *911 Modernization and Public Safety Act of 2007* (H.R. 3403)**

Regarding H.R. 3403, we are very pleased that the Committee called this hearing today and we urge Congress to enact the legislation. As Congress and this Committee have long recognized, the ability to access emergency services by dialing 911, anytime, from anywhere, is vital to the nation’s public safety and emergency preparedness.

Our nation’s 911 system must keep pace with advances in technology and competition. As new technologies and services, including IP-enabled voice services, are used to transmit voice communications via wireless, cable, and traditional wireline infrastructure, it is critical to update 911 regulations. H.R. 3403 will advance public safety and spur additional competition by addressing three anomalies with the current law and regulations.

First, the legislation requires that every interstate provider of IP-enabled voice service offer 911 and E911 services. All Americans expect that when they pick up their home phones, they will be able to call for help in an emergency. They don’t care which technology is being used to transport those calls, they just want the calls to go through. Comcast Digital Voice service was built with 911 and E911 as central features, and we think it is reasonable for Congress to require every IP-enabled voice provider to provide 911 and E911, just as you expect wireless and traditional telephone companies to provide 911 and E911.

Second, the legislation directs the FCC to issue regulations that grant IP-enabled voice providers access to the critical network components necessary to provide 911 and E911 services and ensures that they are available on the same rates, terms and conditions that wireless carriers enjoy. Most of these network components are owned or effectively controlled by the incumbent telephone companies. This bill eliminates any question about our ability to gain access to these essential facilities.

Not only do we need access to the critical network components, but we need access at rates identical to what other voice providers pay. Our entry into the market should not become an opportunity for the incumbent telephone companies to charge monopoly rates for facilities that cannot be duplicated. We are finally realizing one of the key goals of the Telecommunications Act of 1996, that is, promoting facilities-based competition in the voice market. Incumbent telephone companies should not be permitted to use 911 regulations as a means to preserve their overwhelming share of the residential voice

market. This bill ensures that competitive issues do not get in the way of the paramount goal, which is the promotion of public safety.

Third, H.R. 3403 extends to IP-enabled voice providers the same liability protections already in place for wireless and traditional telephone companies, and extends to public safety answering points and users the same protections for IP-enabled voice calls that are already in place for wireless and traditional wireline calls. The current law is unfair to providers and users of IP-enabled voice services, and thus the bill correctly updates the law to recognize this new technology.

### **III. Conclusion**

In conclusion, Comcast supports H.R. 3403. We believe the legislation will advance public safety, promote the availability of 911 and E911 services, and remove unjustified hurdles to the provision of 911 and E911 services by IP-enabled voice providers. We also believe that it will stimulate more competition and consumer choice in the voice market.

We would like to thank Representative Gordon for his leadership on this issue and we look forward to working with the Committee on any technical issues that may arise as the bill moves through the legislative process.

Thank you, and I'd be happy to answer any questions.