

**STATEMENT OF  
COMMISSIONER JONATHAN S. ADELSTEIN**

RE: Sunset of the Cellular Radiotelephone Service Analog Service Requirement and Related Matters,  
RM No. 11355

Our analog service requirement has played a critical role in the development and deployment of cellular service in this country. Today, as is often the case in the telecommunications world, technology has moved on. While analog service was the backbone of cellular service for so many years, it has been replaced for some time now by second- and even third- generation digital wireless technologies.

With digital technology, we see more efficient networks and a dramatic increase in capacity. American consumers now have many benefits of more advanced services that come with digital networks, including the critical personal safety benefit of access to E911 location-capable digital handsets. Carriers, equipment manufacturers, and representatives of the deaf and hard of hearing communities have worked hard, and continue to work collaboratively, on developing a robust selection of digital handsets that are hearing aid compatible. So, after a transition period of over five years, it is right to affirm the sunset of the analog service requirement.

The work required by our transition from analog is not done yet, however. There are remaining analog customers who, if not transitioned, will lose service as service providers shut down analog networks. It is critical that carriers redouble their efforts to ensure that all affected customers have multiple opportunities to retain their service during the final transition to digital service. I am particularly pleased that our item puts in place a number of safeguards to ensure continuity of wireless service, including a strong incentive for carriers to ensure that the discontinuance of analog service will not result in any loss of wireless coverage on a geographic basis.

Finally, I strongly urge the alarm industry and analog carriers to work together to ensure that the analog sunset does not result in an unnecessary disruption to consumers with analog alarm radios. Cooperation and dedication is essential on both sides. The alarm industry, in particular, needs to devote its full resources to transition these customers to digital radios as soon as possible, especially those customers who have analog radios as their primary line of communications. I realize that this is a challenging task. The affected customers, many of whom acquired their analog alarm radios well after the Commission adopted its analog sunset item in 2002, deserve the best treatment possible, and should not have their personal security compromised.