

**REDACTED**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Section 63.71 Application of

AT&T Services, Inc., on behalf of its affiliates BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Inc., d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc., d/b/a AT&T Wisconsin.

Authority Pursuant to Section 214 of  
The Communications Act of 1934, As Amended,  
To Grandfather the Provision of Service

File No.

RECEIVED-FPSC  
2023 NOV 27 AM 9:39  
COMMISSION  
CLERK

**SECTION 63.71 APPLICATION OF AT&T**

AT&T<sup>1</sup> applies for authority under Section 214(a) of the Communications Act, as amended, 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission's

---

<sup>1</sup> AT&T Services, Inc. files this application on behalf of its affiliates BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Inc., d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc., d/b/a AT&T Wisconsin.

(“Commission”) rules, 47 C.F.R. § 63.71, to grandfather certain legacy TDM-based voice services in sections of 13 states.

## **INTRODUCTION**

The communications industry has undergone and is continuing to undergo a seismic shift away from antiquated technologies that customers no longer demand toward next-generation, innovative solutions that customers crave. The speed and scale of this transition, along with its importance to the Commission, policymakers, and the general public, is only growing by the day. AT&T is intent on moving this transition forward by delivering new solutions to meet its customers’ rapidly evolving needs, in the face of fierce competition from both legacy providers and a multitude of new entrants unencumbered by anachronistic regulatory constraints.

In furtherance of that goal, AT&T is simultaneously filing several applications to grandfather certain legacy services provided in sections of 13 states where there is virtually no demand for the services. In this application, AT&T seeks to grandfather certain legacy voice services — AT&T Residential Local Service and AT&T Business Local Exchange Access Line Service (the “Affected Services”), often referred to as “POTS” — in 60 wire centers located within those 13 states. Grandfathering these services, which are outdated and prohibitively expensive for AT&T to maintain, will benefit the public and serve as an important step toward meeting both AT&T’s and the Commission’s goals of advancing the IP revolution.

The benefits of facilitating this transition in these specific wire centers are particularly pronounced given the extreme lack of demand for the Affected Services in the area (“Affected Service Area”). Once the services are grandfathered, the small group of current customers that have not already abandoned the Affected Services will be able to keep their current service. Only prospective customers in the Affected Service Area will be unable to purchase the Affected

Services, and there are virtually no such prospective customers. In fact, AT&T has received *no* new orders for AT&T Residential Local Service over the last five months, even though there are over 69,000 Living Units in the Affected Service Area.<sup>2</sup> Over the last year, cancellations of AT&T Residential Local Service in the area have exceeded new orders of the service by 17,167%.

Individuals and businesses in the Affected Service Area have many cost-effective alternative options to choose from as replacements for the Affected Services. These alternative options include AT&T's next generation solutions — AT&T Phone – Advanced and AT&T Phone for Business – Advanced (“AP-A” and “AP-A Business”) — which AT&T specifically designed as reliable and cost-effective alternatives to the legacy TDM-based voice services at issue in this application.<sup>3</sup> In addition, there are many competitive voice offerings offered over cable, fiber, fixed wireless, mobile wireless, and satellite technologies, which most customers have already selected in lieu of the Affected Services.

**A. AT&T Is Committed to Furthering the Commission's Goal of Providing Advanced Communications Solutions to the American Public**

As the Commission has recognized, “[t]echnological innovation and private investment have revolutionized American communications networks,” and “[a]s part of this transformation, consumers are increasingly moving away from traditional telephone services . . . and towards

---

<sup>2</sup> Living Units include both residential households and businesses. They are calculated using AT&T's internal databases.

<sup>3</sup> Today, AT&T does not seek to *discontinue* legacy TDM-based voice services, only to grandfather them. This application satisfies the appropriate test to grandfather these services, because the public convenience and necessity will not be adversely affected by the grandfathering of the Affected Services. *See* Second Report and Order, *Technology Transitions*, 31 FCC Rcd 8283, ¶ 64 (2016) (“*Second Technology Transitions Order*”) (indicating that the requirements for streamlined treatment under the Adequate Replacement Test only apply to applications to “discontinue a legacy TDM-based voice service,” not to grandfather one).

next-generation technologies using a variety of transmission means, including copper, fiber, and wireless spectrum-based services.”<sup>4</sup> The effects of the technological transition are difficult to overstate, not only for the communications industry, but also for the economy and American society as a whole.

The emergence of mass-market broadband has been a catalyst for these systemic changes in how customers receive their communications. Today, companies that provide voice services through legacy facilities — the primary regulated entities under the Telecommunications Act of 1996 — compete with a panoply of cable companies, fixed-wireless providers, mobile-wireless providers, satellite providers, and other operators that have come to *dominate* the market for broadband services. IP technology has underwritten the explosion of the information economy, unleashing dynamic growth and enabling the emergence of entirely new industries. Across the country, retail and enterprise consumers have voted with their feet to abandon legacy technologies and embrace the myriad improvements in efficiency, innovation, and creativity that IP platforms offer. Already, the IP transition has transformed the way we communicate, educate our children, deliver healthcare, consume energy, obtain news and other information, engage in commerce, and interact with the government — and there is much more progress to be made.<sup>5</sup>

---

<sup>4</sup> Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, 32 FCC Rcd 11128, ¶ 1 (2017) (“*Accelerating Wireline Broadband Deployment Order*”).

<sup>5</sup> As the Commission has observed, broadband also “plays an important role in solving the country’s energy and environmental challenges.” FCC, Energy and Environment, <https://www.fcc.gov/general/energy-and-environment>. Further, because fiber networks use unpowered (passive) optical splitters and generate less heat overall (thereby requiring less cooling), replacing copper with fiber improves energy efficiency by more than two thirds. See *ABI Research Identifies 30 Sustainability Action Items for Telco Operators*, ABI Research (Apr. 21, 2022), <https://www.abiresearch.com/press/purchasing-renewable-energy-removes-co2-emissions-equal-to-20-million-barrels-of-oil-a-year-for-leading-telco-operators> (estimating 85% improved efficiency). Modern IP switches are also very efficient and can be housed in much

The manifold impacts of this transition — its potential to improve American lives and benefit consumers, as well as its attendant demand for regulatory adaptation — have been well-recognized by the Commission. Since at least 2014, the Commission has made clear that its “over-arching purpose . . . is to speed technological advances,”<sup>6</sup> and it has taken steps to help “eliminate unnecessary delays” in the discontinuance of legacy services that customers heading toward a “world without copper” have “largely . . . abandoned.”<sup>7</sup> In 2016, for example, the Commission adopted a test for streamlined treatment of applications seeking to discontinue legacy voice services.<sup>8</sup> And in 2018, the Commission adopted multiple “streamlin[ed]” approaches for discontinuance of legacy services, including the elimination of any requirement to file a discontinuance application on “a service for which the requesting carrier has had no customers or reasonable requests for service” for the last 30 days.<sup>9</sup>

As the Commission has explained, allowing carriers to promptly discontinue legacy services that are no longer in demand “enabl[es] carriers to redirect resources . . . to more rapidly bring[] next-generation services and networks to all customers.”<sup>10</sup> With this modernization,

---

smaller facilities, with correspondingly smaller energy needs, than the huge facilities that legacy TDM switches require. *See* Tom Wheeler, Chairman, FCC, Keynote Address at the Brookings Institution: Maximizing the Benefits of Broadband at 6 (June 26, 2015), [https://www.brookings.edu/wp-content/uploads/2015/06/20150626\\_fcc\\_wheeler\\_broadband\\_transcript.pdf](https://www.brookings.edu/wp-content/uploads/2015/06/20150626_fcc_wheeler_broadband_transcript.pdf) (noting that software defined networks “can save up to 60 percent on energy costs”).

<sup>6</sup> Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, *Technology Transitions*, 29 FCC Rcd 1433, ¶ 23 (2014) (“*2014 Technology Transitions Order*”).

<sup>7</sup> *Accelerating Wireline Broadband Deployment Order*, ¶¶ 22, 33, 81.

<sup>8</sup> *See Second Technology Transitions Order* ¶ 65.

<sup>9</sup> Second Report and Order, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, 33 FCC Rcd 5660, ¶ 5, App. A ¶ 2 (2018) (“*Second Accelerating Wireline Broadband Deployment Order*”).

<sup>10</sup> *Id.* ¶ 20.

carriers “can dramatically reduce network costs, allowing providers to serve customers with increased efficiencies that can lead to improved and innovative product offerings and lower prices.”<sup>11</sup> These changes allow for “further investments in innovation that both enhance existing products and unleash new services, applications and devices, thus powering economic growth.”<sup>12</sup>

These transformative changes have occurred at an extraordinary pace. As the Commission has repeatedly explained, “[i]n the voice marketplace, incumbent LECs face competition from facilities-based providers, including cable companies offering VoIP and fixed wireless providers, as well as from mobile wireless providers.”<sup>13</sup> POTS subscriptions provided by incumbent LECs amounted to *less than 5% of all voice subscriptions nationwide* — and POTS subscriptions “declined at a compound annual growth rate of 12.9% per year” over the preceding three-year period.<sup>14</sup> Nationwide, more than 70% of adults and more than 80% of children live in households that have replaced wireline phone service (whether VoIP or POTS services) with wireless service exclusively.<sup>15</sup> As competition has swelled, including from cable providers, incumbent providers serve an ever-shrinking minority of residential and business wireline voice subscriptions.<sup>16</sup> As the Commission summarized in 2020, American consumers

---

<sup>11</sup> *2014 Technology Transitions Order* ¶ 2.

<sup>12</sup> *Id.*

<sup>13</sup> Notice of Proposed Rulemaking, *Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services*, 34 FCC Rcd 11290, ¶ 21 (2019) (“*Modernizing Unbundling and Resale Requirements NPRM*”).

<sup>14</sup> See FCC, *Voice Telephone Services: Status as of June 30, 2022*, at 2-3 (August 2023), <https://docs.fcc.gov/public/attachments/DOC-396138A1.pdf> (“*Voice Telephone Services*”).

<sup>15</sup> See Stephen Blumberg & Julian Luke, Nat’l Ctr. for Health Stats., *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2022* (May 2023), <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202305.pdf>.

<sup>16</sup> See *Voice Telephone Services* Tables 1-2 (showing that incumbent LECs provide approximately 32 million wireline retail voice connections nationwide, out of 462 million overall

have embraced the “transition[] to newer technologies, increasingly moving from fixed legacy voice to fixed or nomadic voice over Internet protocol (VoIP) and mobile voice services, and from DSL to broadband provided over fiber and fixed and mobile wireless” — a transition that “will only accelerate” with the “widespread deployment of 5G wireless networks.”<sup>17</sup> The declines in subscribership that the Commission has recognized show no sign of slowing.<sup>18</sup>

Policymakers have similarly embraced the task of accelerating the IP transition and ensuring that all Americans have access to affordable, reliable, high-speed broadband. In the American Rescue Plan Act, Congress created both the \$10 billion Capital Projects Fund and the \$7.17 billion Emergency Connectivity Fund.<sup>19</sup> As of September 2023, nearly \$8 billion from the capital fund has been disbursed to support broadband and related projects in 47 states and three territories,<sup>20</sup> while nearly \$7 billion from the connectivity fund is committed to support

---

retail voice telephone connections); *see also id.* (showing that incumbent LEC switched access lines only account for 25.8% of residential wireline voice subscriptions and 19.9% of business wireline voice subscriptions, that incumbent LEC VoIP accounts for 14.5% and 8.3% of residential and business wireline voice subscriptions, respectively, and that non-incumbent LEC VoIP accounts for 58% and 62.3% of residential and business wireline voice subscriptions, respectively).

<sup>17</sup> *Modernizing Unbundling and Resale Requirements Order* ¶ 23.

<sup>18</sup> *See, e.g., FCC, 2022 Communications Marketplace Report*, FCC 22-103, at ¶ 170 (rel. Dec. 30, 2022) (noting that “[t]he number of fixed retail switched-access lines declined [nationwide from December 2018 to December 2021] at a compound annual rate of 12.3%,” “while interconnected VoIP services continue[d] to increase”).

<sup>19</sup> *See American Rescue Plan Act of 2021*, Pub. L. No. 117-2, tit. IX, § 9901, 135 Stat. 4, 233 (2021); *see also id.*, tit. VII, § 7402, 135 Stat. at 109.

<sup>20</sup> *See Press Release, U.S. Dep’t of the Treasury, Treasury Department Announces Approval of Federal Funds to Help Close Digital Divide in Puerto Rico as Part of President Biden’s Investing in America Agenda* (Sept. 6, 2023), <https://home.treasury.gov/news/press-releases/jy1713>.

approximately 18 million students, 11,200 schools, and 1,000 libraries nationwide.<sup>21</sup> States are currently in the process of submitting their plans for drawing on the \$42.5 billion Broadband Equity, Access, and Deployment Program to fund the deployment of new networks to bring broadband to unserved and underserved areas of the country.<sup>22</sup>

AT&T is investing significantly to continue to be an industry leader in this IP transition, devoting \$100 billion to spectrum acquisitions and capital infrastructure improvements over a three-year period.<sup>23</sup> Last year marked the company's fifth straight year with 1 million or more net additions for AT&T Fiber.<sup>24</sup> AT&T leads the industry in bringing fiber to new homes; by the end of last year, AT&T had the ability to serve more than 19 million consumer locations and more than 3 million business locations over last-mile fiber facilities.<sup>25</sup> And as the company announced to shareholders in its 2022 Annual Report, AT&T is on track to reach its goal of 30-million-plus total locations for AT&T Fiber by the end of 2025.<sup>26</sup>

On the wireless side, AT&T's investments have been exponential. In 2022, the company successfully deployed enough mid-band 5G spectrum to reach *more than 150 million people*,

---

<sup>21</sup> See Press Release, Federal Communications Commission, *FCC Announces \$7 Million in Emergency Connectivity Funding for Schools and Libraries* (Sept. 6, 2023), <https://docs.fcc.gov/public/attachments/DOC-396704A1.pdf>.

<sup>22</sup> See Broadband USA, *Public Notice Posting of State and Territory BEAD and Digital Equity Plans/Proposals*, <https://broadbandusa.ntia.doc.gov/public-notice-posting-state-and-territory-bead-and-digital-equity-plansproposals>.

<sup>23</sup> John T. Stankey, CEO, AT&T, Remarks at the Goldman Sachs Communacopia + Technology Conference (Sept. 6, 2023), <https://investors.att.com/~media/Files/A/ATT-IR-V2/events-and-presentations/t-usq-transcript-2023-09-06.pdf> ("John T. Stankey Remarks").

<sup>24</sup> AT&T Inc., 2022 Annual Report (Feb. 13, 2023), at 2, <https://investors.att.com/~media/Files/A/ATT-IR-V2/financial-reports/annual-reports/2022/2022-complete-annual-report.pdf>.

<sup>25</sup> See *id.*

<sup>26</sup> See *id.*

more than double the company's original year-end coverage target.<sup>27</sup> By the end of 2023, AT&T will reach *more than 200 million* people with mid-band 5G spectrum.<sup>28</sup> As the Commission knows, that mid-band spectrum provides an ideal combination of capacity and penetration to power the 5G services, including home broadband, that consumers and businesses are demanding.

In tandem, AT&T is investing in new technologies that leverage its wireless network to ensure that landline voice customers have continued access to reliable and affordable voice service. As discussed in more detail in the following sections, AT&T has recently deployed its next-generation AP-A and AP-A Business services, which AT&T specifically designed as cost-effective alternatives to POTS. AP-A and AP-A Business are designed for maximum convenience, enhanced functionality, and better reliability. Customers may use their existing TDM-based telephones, inside wiring, and phone jacks to make and receive voice calls, which are then transmitted using either AT&T's wireless spectrum or an existing wired broadband connection. AP-A and AP-A Business provide reliable service with superior voice quality, security, and lower maintenance costs than legacy copper-based voice service. These offerings are also interoperable with an array of other technologies. These innovative solutions help ensure that customers can make a seamless transition from legacy TDM-based voice services to next-generation technologies.

In areas where AT&T is required to continue to provide legacy services, though, AT&T effectively has to maintain two parallel networks: one cutting-edge and the other dating to the origins of the Bell System. Maintaining the copper network, with its legacy telephone

---

<sup>27</sup> *See id.*

<sup>28</sup> *See* John T. Stankey Remarks.

technology and outdated equipment, drains resources away from AT&T expanding its state-of-the-art broadband network and offerings.

**B. AT&T Is Filing Several Applications to Grandfather Antiquated Services in Certain Areas that Are in Low Demand to Prioritize Investment in Advanced Communications Solutions**

Against this backdrop, AT&T today is filing this application and three others to grandfather certain legacy services in 60 wire centers located in sections of 13 states. This application concerns AT&T Residential Local Service and AT&T Business Local Exchange Access Line Service, which AT&T currently offers in portions of all 60 wire centers. The other three applications concern certain VoIP services provided over copper; DS1 and DS3 services; and Remote Call Forwarding, which AT&T currently offers in a much smaller subset of those 60 wire centers. Grandfathering and then, through a separate, future application pursuant to the applicable Commission rules, discontinuing these services will enable AT&T to retire its copper networks in these 60 wire centers, where the decline in the customer base and cost of maintaining an antiquated legacy network are particularly dramatic.

Pursuant to 47 C.F.R. § 63.71(g), AT&T has already discontinued *all* services provided over legacy facilities in broad identifiable areas within the footprint of many of these wire centers, because no customers were purchasing the services and AT&T had received no reasonable requests for the service for a 30-day period immediately preceding discontinuance.<sup>29</sup> In addition, AT&T has discontinued services addressed in these applications under § 63.71(g) throughout the entirety of a wire center, where there is no demand for those services in the wire

---

<sup>29</sup> As the Commission explained in adopting this “no demand” regulation, “neither current nor future customers will be harmed by forbearing from applying discontinuance obligations for services with no customers.” *Second Accelerating Wireline Broadband Deployment Order* ¶¶ 15, 19.

center. For example, AT&T has discontinued, or will soon discontinue, certain VoIP services provided over copper in 51 out of the 60 wire centers. Thus, AT&T's application relating to those VoIP services — AT&T Phone Service and AT&T Phone for Business Service — only relates to nine wire centers. Similarly, AT&T has discontinued, or will soon discontinue, DS1 and DS3 service in the vast majority of the 60 wire centers, because AT&T has no customers and received no reasonable requests for either service in the preceding 30 days. Thus, the application that AT&T is also filing today relating to DS1 and DS3 services relates only to nine wire centers.

In the small sections of the wire centers at issue where any customers buy these legacy services from AT&T, the overwhelming majority of residents and businesses have abandoned AT&T's legacy products for competitive alternatives. In fact, less than 3.2% of living units in those areas subscribe to any of the AT&T services subject to these four applications, and new demand for the services is virtually nonexistent. For example, in the last year, AT&T has received three new orders for retail AT&T Residential Local Service (AT&T's consumer POTS service at issue in this application), *no* new orders for AT&T Phone for Business (AT&T's business VoIP service) provided over copper, and *no* new orders for DS1 or DS3 services in any of the wire centers subject to the respective applications that AT&T is filing today. AT&T has received *no* new orders for AT&T Residential Local Service or AT&T Business Local Exchange Access Line Service from carrier-customers in the Affected Service Area in the last *three* years.

As discussed in more detail in each respective application, current and prospective customers of all these services have numerous cost-effective alternatives to choose from, including, for voice services, AT&T's newly deployed AP-A and AP-A Business services. In addition to the cost-effective and superior alternatives that AT&T offers, Commission data shows that at least one cable provider or fiber provider provides high-speed broadband to living

units within affected areas in all 60 wire centers, and 48 of the 60 wire centers are served by three or more cable or fiber providers. Fixed Wireless providers, including T-Mobile and Nextlink, provide high-speed broadband across the vast majority of wire centers, and satellite service provided by HughesNet, Viasat, and Starlink is also available in all 60 wire centers. Individuals and businesses in the affected areas can also receive mobile wireless service (voice and broadband) from providers including T-Mobile, Verizon, and/or AT&T.

Because the costs of providing legacy services in these areas is largely fixed, it has become prohibitively costly for AT&T to maintain these services for the very small number of customers continuing to purchase them in these 60 wire centers. In the past year alone, AT&T has lost *millions of dollars* providing these legacy services in the areas affected by the applications it is filing today, and it will only become even more uneconomic to provide these services as the number of subscribers continues to decline. Once these services are grandfathered, *all current customers will be able to keep their* current services but prospective customers will no longer be able to purchase them.

AT&T has demonstrated its commitment to leading the industry in establishing an orderly and deliberate structure for completing this technological transition. We strongly urge the Commission to embrace this structure, so that those consumers who have not already completed this transition through their own choices are treated fairly and AT&T is not hamstrung against its competitors through a lack of regulatory parity.<sup>30</sup> By approving these grandfathering

---

<sup>30</sup> The Commission has routinely stated that regulatory parity is important to maintaining a competitive marketplace. *See, e.g.,* Report and Order, *Business Data Services in an Internet Protocol Environment*, 32 FCC Rcd 3459 ¶ 157 (2017) (describing how “lack of regulatory parity among broadband data services . . . has created barriers to entry and impeded competition”), vacated in part on other grounds, *Citizens Telecomms. Co. of Minn. v. FCC*, 901 F.3d 991 (8th Cir. 2018).

applications and the eventual discontinuance of these legacy services, the Commission will facilitate this important technological advancement and further the public interest.

**C. This Application Seeks to Grandfather Legacy Voice Services in 60 Wire Centers Where Almost All Customers Have Already Canceled Their AT&T Subscriptions in Favor of Cost-Effective Alternatives**

This application concerns AT&T Residential Local Service and AT&T Business Local Exchange Access Line Service. AT&T has notified the users of the Affected Services of the planned grandfathering to occur on or after December 31, 2023, and *all current customers will be able to keep their current service* after that date. Once grandfathered, the Affected Services will no longer be available for purchase by new customers in the Affected Service Area.

The demand for these Affected Services is exceptionally low and declining dramatically. Almost all individuals and businesses in the Affected Service Area have already switched to alternative voice providers, and there are many cost-effective options for customers in these areas to choose from, as evidenced by AT&T's declining voice customer base. Across the entire Affected Service Area, only 1,783 AT&T customers receive AT&T Residential Local Service, accounting for approximately 2.6% of the Living Units in the Affected Service Area.<sup>31</sup> *See Ex. 1* (providing detail on the number of subscribers to each Affected Service in each affected wire center). That is approximately a 50% decline in the number of subscribers since 2020. As the table at Exhibit 1 shows, there is less than a de minimis number of residential voice customers across the Affected Service Area. For example, there are fewer than 50 subscribers to AT&T Residential Local Service in 51 out of the 60 wire centers subject to this application, and there

---

<sup>31</sup> This figure includes seven lines purchased by four carrier-customers for resale.

are *no* residential subscribers in five of the wire centers.<sup>32</sup> In no wire center does AT&T provide AT&T Residential Local Service to more than 106 customers.

Similarly, across the entire Affected Service Area, only 269 customers receive AT&T Business Local Exchange Access Line Service, through 1,077 business lines.<sup>33</sup> As the table at Exhibit 1 shows, there are two or fewer customers of AT&T Business Local Exchange Access Line Service in roughly one-third of the 60 wire centers subject to this application, and less than ten customers in 52 out of the 60 wire centers. There are *no* customers of AT&T Business Local Exchange Access Line Service in three of the wire centers, and in no wire center does AT&T provide the service to more than 30 customers.

These numbers continue to decline precipitously: Across AT&T's entire footprint, new orders for AT&T Residential Local Service have plummeted by 96% since 2014. The decline in recent years in the Affected Service Area is particularly dramatic. Between September 2022 and September 2023, AT&T only received *three* new orders of AT&T Residential Local Service throughout the Affected Service Area. That represents 0.004% of Living Units in the Affected Service Area. In the same time frame, at least 518 customers canceled their subscriptions to

---

<sup>32</sup> AT&T can and may discontinue Affected Services in these wire centers, if it determines pursuant to 47 C.F.R. § 63.71(g) that it not only has no customers but also that it has received no reasonable requests for the service for a 30-day period immediately preceding discontinuance. For example, if AT&T determines that there is zero demand for AT&T Business Local Exchange Access Line Service in a wire center, AT&T can and may discontinue that service (regardless of whether there are customers for AT&T Residential Local Service in that wire center.) However, for administrative simplicity, AT&T includes Affected Services with no customers in some (but not all) wire centers within the Affected Service Area in this grandfathering application.

<sup>33</sup> This figure includes five carrier-customers who resell 38 lines of AT&T Business Local Exchange Access Line Service in the Affected Service Area. AT&T has nine carrier-customers who purchase and resell either of the Affected Services in the Affected Service Area. Those nine carrier-customers resell the Affected Services in 11 out of the 60 wire centers.

AT&T Residential Local Service in the Affected Service Area, more than *172 times* the number of new orders. Likewise, between August 2022 and August 2023, only *seven* new AT&T customers purchased AT&T Business Local Exchange Access Line Service in the Affected Service Area — and four of these customers have already cancelled their subscription to the service. Since 2020, the number of AT&T Business Local Exchange Access Line Service lines in service in the 57 wire centers with current customers has declined by over 44%.

Prospective and current customers in the Affected Service Area have many options to choose from in lieu of the Affected Services. The exodus of residential and business customers from AT&T's legacy voice offerings in the Affected Service Area demonstrates that most former consumers have elected to receive voice services from the many alternative providers competing in the area. These former customers are still receiving voice services in the Affected Service Area, but they are no longer receiving such services from AT&T's TDM-based products because they have chosen other options. Many have embraced wireless options in lieu of wireline voice, a trend that the Commission has recognized "is only going to increase further as 5G deployment progresses" and pushes copper "loops into obsolescence."<sup>34</sup> Many former customers that still use wired phones presumably are purchasing voice service from cable providers, such as Charter or Xfinity, among others. According to Commission data, cable providers offer voice services in all but three of the 60 wire centers; in those three wire centers, AT&T has just 51 residential customers and eight business customers. That same data also shows that in those three wire centers and many others, high speed broadband is offered over fiber, offering yet another alternative for voice services. Customers in the Affected Service area also can purchase internet

---

<sup>34</sup> *Modernizing Unbundling and Resale Requirements Order* ¶ 58.

service through fixed wireless providers, such as T-Mobile or Nextlink, or use over-the-top VoIP services in conjunction with their wired (or cordless) telephones. Other customers still can use satellite providers, including Viasat, Hughes, and Starlink. AT&T, T-Mobile, Verizon, and mobile resellers also offer CMRS-based voice throughout Affected Service Area.<sup>35</sup> All of these services are regularly advertised as cost-effective and superior alternatives to the Affected Services.<sup>36</sup>

---

<sup>35</sup> Mobile wireless services also come with several technological advantages over POTS that increase their value to consumers. In addition to the obvious benefit of being *mobile*, when customers move, they do not have to cancel and initiate new service, nor do they have to worry about changing phone numbers. In many cases, wireless plans include data service in addition to voice service. Mobile wireless providers are also subject to the FCC's 911 regulations, including location-accuracy requirements. 47 C.F.R. § 9.10. According to the AARP, “[t]he bottom line is that you can make the switch from your copper-wire landline safely.” John R. Quain, *Is It Safe to Get Rid of Your Landline?*, AARP (June 21, 2021), <https://www.aarp.org/home-family/personal-technology/info-2020/get-rid-of-landline.html>. Indeed, “‘it is actually safer to call 911 from a cellphone because of all of the additional information that you are able to share.’ . . . For example, Apple iOS users can choose to share critical health information via the Apple Medical ID feature, a potentially lifesaving function.” *Id.* (quoting RapidSOS Chief Executive Michael Martin and noting that RapidSOS works with thousands of 911 call centers). Mobile wireless services also provide access to 711 abbreviated dialing for Telecommunications Relay Service users.

<sup>36</sup> *See, e.g.*, Xfinity – Home Phone, Equipment, <https://www.xfinity.com/learn/home-phone-services/equipment> (last visited Oct. 13, 2023) (advertising “reliable home phone with amazing call clarity” for \$15 per month, and explaining that “[u]nlike traditional home phones, Xfinity Voice operates over a connection using Internet protocol technology to give you amazing call clarity and other great features”); Spectrum – Spectrum Voice - Home Phone, <https://www.spectrum.com/home-phone> (last visited Oct. 13, 2023) (advertising “reliable home phone services” with Spectrum voice for \$14.99 a month); T-Mobile – *The State of Fixed Wireless Access, 2022*, at 1, [https://www.t-mobile.com/news/\\_admin/uploads/2022/12/2945098\\_CCD\\_State-of-Fixed-Wireless-Access\\_Infographic-Report\\_REVW\\_v18\\_RGB-2.pdf](https://www.t-mobile.com/news/_admin/uploads/2022/12/2945098_CCD_State-of-Fixed-Wireless-Access_Infographic-Report_REVW_v18_RGB-2.pdf) (last visited Oct. 13, 2023) (advertising T-Mobile’s fixed wireless as a new alternative to DSL, Satellite, and cable that is available “in many cases [at] a better price”); Nextlink – Crystal Clear Home Phone Service, <https://nextlinkinternet.com/home-phone-service/> (last visited Oct. 13, 2023) (“Whether you prefer a reliable, standard voice package or one with all the features, our residential packages are perfect for your home and home office. Get everything you need to keep in touch at an affordable price.”); Viasat – Viasat Voice, <https://www.viasat.com/satellite-internet/add-ons/voip> (last visited Oct. 13, 2023) (offering “[g]reat call quality plus voicemail, call waiting, caller ID, and many other popular features” for “home phone service”); T-Mobile – What is POTS, and What It Means to Your

Most importantly, in the Affected Service Area AT&T now offers AP-A and AP-A Business, which AT&T specifically designed as cost-effective alternatives to POTS. These services leverage AT&T's substantial investments in its wireless network to ensure that customers enjoy continued access to dependable and cost-effective voice services. Nationwide, AT&T already has 1,169 residential customers using AP-A and 6,669 business customers using AP-A Business. These easy-to-use, competitively priced services are broadly available across the Affected Service Area, and provide superior functionality than the Affected Services.

AP-A and AP-A Business allow customers to use their existing TDM-based telephones, inside wiring, and phone jacks to make and receive voice calls. AP-A and AP-A Business transmit those calls using either AT&T's wireless spectrum or an existing wired broadband connection, rather than a copper loop. By using multiple means of transmitting data, AP-A and AP-A Business can offer customers greater redundancy and reliability than legacy POTS services. They also reduce or eliminate the downtime associated with hard-to-service POTS lines after an outage and can offer customers further peace of mind by providing automatic failover to a second form of connectivity in such an event. Through these and other means, AP-A and AP-A Business provide reliable service with superior quality and lower maintenance costs than legacy copper-based voice service.

AP-A and AP-A Business also provide a number of services that customers highly value, many of which cannot be provided by the Affected Services. For example, AP-A comes with access to Digital Phone Call Protect, a spam-prevention feature which helps protect users against

---

Business?, <https://www.t-mobile.com/business/solutions/iot/pots-phone-network> (last visited Nov. 8, 2023) (noting that “POTS is being replaced by newer technologies such as . . . cellular networks from carriers such as T-Mobile” and advertising “[r]eliable service with T-Mobile’s national high-speed network”).

unwanted calls that are plaguing the American public. As the Commission has observed, U.S. consumers receive approximately 4 billion robocalls per month.<sup>37</sup> They are the “FCC’s top consumer complaint and [the FCC’s] top consumer protection priority.”<sup>38</sup> AT&T is deeply committed to tackling this problem, and AP-A protects customers from these unwanted calls. Digital Phone Call Protect provided through AP-A provides call validation, automatic fraud blocking, and a suspected spam call warning, among other features. As the Commission has recognized, Digital Phone Call Protect has successfully blocked tens of millions of suspected fraud calls, and has further provided tens of millions of spam warnings via caller ID.<sup>39</sup> Over 180,000 AT&T customers have opted to receive Digital Phone Call Protect service as of March 2021.<sup>40</sup> Customers that have switched away from POTS to AP-A have explained to AT&T that this feature is a significant advantage over POTS and makes a positive impact on their daily lives.

Customers of AP-A Business also benefit from remote monitoring of connections, hardware, performance, and service continuity. A customer need not wait until it does not

---

<sup>37</sup> See FCC, *Robocall Response Team: Combating Scam Robocalls & Robotexts*, <https://www.fcc.gov/spoofed-robocalls> (Aug. 19, 2022); see also Report, *Call Blocking Tools Available to Consumers: Second Report on Call Blocking*, 36 FCC Rcd 10122, ¶¶ 7-8 (2021) (“*Call Blocking Report*”) (noting that the FCC and Federal Trade Commission together receive hundreds of thousands of complaints about unwanted calls each month, and that robocallers made an estimated 58.5 billion robocalls in 2019 alone).

<sup>38</sup> FCC, *Stop Unwanted Robocalls and Texts* (July 7, 2023), <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts>; see also Report and Order and Further Notice of Proposed Rulemaking, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, 32 FCC Rcd 9706, ¶¶ 5, 11 (2017) (recognizing that customers face an “unacceptably high volume of illegal robocalls” and that there is an “urgent need for providers to take action against spoofed calls”).

<sup>39</sup> See *Call Blocking Report* ¶ 31 (“From December 2017 through March 2021, AT&T has blocked more than 52 million incoming calls and provided more than 55 million spam warnings to Digital Phone Call Protect users.”)

<sup>40</sup> *Id.*

receive a dial tone to learn that a pest chewed through an old POTS line to its business. Instead, AT&T can remotely identify issues with AP-A Business and promptly take steps to address them. AT&T also designed these products with the utmost focus on customer safety and emergency response, even in the event of a power outage: AP-A and AP-A Business provide for E911 location detection and include a built-in 24-hour battery backup enabling voice services, including 911 services, when the power goes out. AP-A and AP-A Business employ highly secure TLS encryption and offer industry-leading robust network security and performance, which AT&T constantly tracks via dedicated Data Monitoring Centers.<sup>41</sup>

AP-A and AP-A Business are designed to meet or surpass applicable criteria concerning accessibility, usability, and compatibility for services benefiting individuals with disabilities, such as telephone relay services. More and more customers are using these features in successful and inspiring ways as the adoption of these services grows. AP-A Business also meets or exceeds the Managed Facility Voice Network definitions and conforms to ANSI, UL60950-1 and UL62368-1, and NFPA 72 standards. AP-A and AP-A Business include a number of additional prized features, such as unlimited domestic long-distance calling, call forwarding, caller ID, call waiting, 3-way calling, and anonymous call blocking.

AP-A and AP-A Business are not only feature-rich but are also designed for ease of use. The services are interoperable with an array of other TDM-based technologies, such as fax machines, alarms, and medical monitoring devices, enabling customers to bring their analog equipment to the cloud in a highly secure and scalable environment. And while both services are

---

<sup>41</sup> See AT&T, *Network Quality and Reliability* (June 8, 2023), <https://sustainability.att.com/priority-topics/network-quality-reliability> (outlining AT&T's substantial investments and accomplishments in network quality, reliability and resilience, achieving a system average interruption frequency of 0.000521984 in 2022).

available for rapid installation from AT&T's expert technicians, AP-A is designed for easy self-installation as well. Once the device is plugged in, the customer can easily check the cellular strength indicator on the front of the device to ensure that the coverage is optimal in the particular location of the home or business. The device can then be used to place a call, all within minutes of unboxing.

AP-A and AP-A Business are available for comparable or even lower price than existing TDM-based services, which are becoming increasingly expensive for providers to offer. AP-A Business customers can save further money and time by consolidating their existing lines into one account. Businesses also have more flexibility, as they can more easily add lines and equipment as their needs grow. Other customers can realize substantial cost savings from AP-A and AP-A Business's interoperability with legacy technologies and peripherals, which enables customers to extend the useable lifespan of their TDM-based devices.

AP-A and AP-A Business enable customers to make an essentially seamless transition from legacy TDM-based voice services to next-generation technologies. Through its investments in AP-A and AP-A Business, AT&T is committed to ensuring that legacy voice customers can share in the IP revolution even as they continue to enjoy the reliable, cost-effective voice services they have long associated with AT&T. AT&T's feedback to date for the services has resoundingly positive, with customers praising the services' reliability, call quality, and competitive pricing. Many customers have noted that calls made using AP-A and AP-A Business are clearer and subject to less static than legacy voice offerings, and have expressed the wish that they had switched to AP-A and AP-A Business earlier. Between AP-A, AP-A Business, AT&T's other voice offerings (such as AT&T Office@Hand, AT&T IP Flexible Reach, and AT&T Phone for Business), and many competitive options, customers and

prospective customers of the Affected Services have a multitude of cost-effective offerings to choose from.

Because there are numerous cost-effective, superior alternatives for prospective customers in the Affected Service Area to choose from and because most customers have already left for such alternatives in droves, grandfathering the Affected Services in this area will not impair the public convenience or necessity.

### **APPLICATION**

As required by Section 63.71 of the Commission's rules, AT&T provides the following information:

**Name and Address of Carrier:**

BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee

Illinois Bell Telephone, LLC, d/b/a AT&T Illinois

Indiana Bell Telephone Company, Inc., d/b/a AT&T Indiana

Michigan Bell Telephone Company d/b/a AT&T Michigan

The Ohio Bell Telephone Company, d/b/a AT&T Ohio

Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas

Wisconsin Bell, Inc, d/b/a AT&T Wisconsin.

The address for purposes of this application is:

208 South Akard Street  
Dallas, TX 75202

**Date of Planned Service Grandfathering:**

Effective on or after **December 31, 2023**, pending regulatory approval,<sup>42</sup> AT&T's Affected Services will be grandfathered and will no longer be available for purchase by new customers.

**Points of Geographic Areas of Service Affected:**

AT&T plans to grandfather the Affected Services in the Affected Service Area set forth below. The list below identifies the wire centers in each State that include any service areas that fall within the Affected Service Area.<sup>43</sup> The *shaded* portions of exhibits 5 through 64 identify the sections of each wire center included within the Affected Service Area, and the number of current customers for each Affected Service is depicted in Exhibit 1. The Affected Service Area impacted by this application comprises:

*Sections of Florida:* Certain areas currently served by the following wire centers: Big Pine Key (BGPIFLMA) (Ex. 5), Fort George (FTGRFLMA) (Ex. 6), Fort Lauderdale (FTLDFLAP) (Ex. 7), Sugarloaf Key (SGKYFLMA) (Ex. 8);

*Sections of Illinois:* Certain areas currently served by the following wire centers: Beckemeyer (BCKMILBM) (Ex. 9), Cantrall (CNTRILCT) (Ex. 10), Fairmount (FAMTILFA) (Ex. 11), Fiatt (FIATILFI) (Ex. 12), Fithian (FTHNILFT) (Ex. 13), Harristown (HRTWILHT) (Ex. 14), Indianola (INDNILIN) (Ex. 15), Iuka (IUKAILIU) (Ex. 16), Kaneville (KAVLILKA) (Ex. 17), Lewistown (LWTWILLT) (Ex. 18), Schaumburg (SCBGILRS) (Ex. 19), St. David

---

<sup>42</sup> To the extent that additional state requirements apply to grandfathering the Affected Services, AT&T will of course satisfy those requirements prior to effectuating the grandfathering.

<sup>43</sup> In some instances, an entire wire center is included in the Affected Service Area. In many instances, only specific sections of service area within a wire center, called "Distribution Areas" or "DAs," are included in the Affected Service Area.

(STDVILCS) (Ex. 20), Tallula (TALLITL) (Ex. 21), Trivoli (TRIVILTI) (Ex. 22), Verona (VRNAILVE) (Ex. 23);

Sections of Indiana: Certain areas currently served by the following wire centers:

Mechanicsburg (MCBBIN01) (Ex. 24), Solitude (SLTDIN01) (Ex. 25);

Sections of Kentucky: Certain areas currently served by the following wire centers:

Cornishville (CHVLKYMA) (Ex. 26), Ghent (GHNTKYMA) (Ex. 27), Hebbardsville (HBVLKYMA) (Ex. 28), Woodburn (WDBNKYMA) (Ex. 29);

Sections of Louisiana: Certain areas currently served by the following wire centers:

Alsatia (LKPRLAAL) (Ex. 30), Mer Rouge (MRRGLAMA) (Ex. 31);

Sections of Michigan: Certain areas currently served by the following wire centers:

Belleville (BLVLMINE) (Ex. 32), Bergland (BRLDMIMN) (Ex. 33), Bay Port (BYPTMIMN) (Ex. 34), Chassel (CHSLMIMN) (Ex. 35), Michigamme (MCHGMIMN) (Ex. 36), Powers (PWRSMIMN) (Ex. 37), Sebewaing (SBWNMISB) (Ex. 38);

Sections of Missouri: Certain areas currently served by the following wire centers:

Armstrong (ARMSMOCR) (Ex. 39), Delta (DELTMO SW) (Ex. 40), San Antonio (SNANMOMO) (Ex. 41);

Sections of Ohio: Certain areas currently served by the following wire centers: Brook

Park (BKPKOH97) (Ex. 42), Milledgeville (MDVLOH94) (Ex. 43), Salineville (SAVLOH67) (Ex. 44);

Sections of Oklahoma: Certain areas currently served by the following wire centers:

Cromwell (CRWLOKMA) (Ex. 45), Fairmont (FAMTOKMA) (Ex. 46), Glencoe (GLCOOKMA) (Ex. 47), Headrick (HDRCOKMA) (Ex. 48), Mulhall (MLHLOKMA) (Ex. 49), Ralston (RLTNOKMA) (Ex. 50), Ripley (RPLYOKMA) (Ex. 51);

Sections of South Carolina: Certain areas currently served by the following wire centers:

Blenheim (BLNHSCMA) (Ex. 52), Spartanburg (SPBGSCHW) (Ex. 53);

Sections of Tennessee: Certain areas currently served by the following wire centers:

Hornbeak (HRNBTNMT) (Ex. 54), Nashville (NSVLTNAA) (Ex. 55), Cockrill Bend (NSVLTNCD) (Ex. 56), Troy (TROYTNMT) (Ex. 57);

Sections of Texas: Certain areas currently served by the following wire centers:

Adamsville (ADVLTXAV) (Ex. 58), Bayside (BYSDTXBY) (Ex. 59), Goldsmith (GLDSTXGS) (Ex. 60), Skidmore (SKDMTXSK) (Ex. 61), Westbrook (WSBKTXWB) (Ex. 62);

Sections of Wisconsin: Certain areas currently served by the following wire centers:

Richmond (RCMDWI11) (Ex. 63), and Van Dyne (VNDNWI11) (Ex. 64).

**Brief Description of Type of Service Affected:**

AT&T plans to grandfather AT&T Residential Local Service and AT&T Business Local Exchange Service in the Affected Service Area. As indicated above, the number of current customers for each Affected Service is depicted in Exhibit 1.

AT&T Residential Local Service is a TDM-based exchange access line service comprised of the serving central office line equipment and all outside plant facilities needed to connect the serving central office with the network interface at the demarcation point of the customer premises. The service includes optional custom calling features and the End User Common Line service, which allows the line to facilitate local exchange, intrastate interexchange and interstate voice calling.

AT&T Business Local Exchange Access Line Service provides individual business customers with telecommunications service within a specified geographical area for local calling

and access to and from the telecommunications network for Long Distance Message Telecommunications Service.

As explained in the Introduction, the public convenience and necessity will not be impaired by the grandfathering of these services. The demand for these services and the other Affected Services is very low. The very small base of existing customers has been steadily declining, and new customer orders for the Affected Services have virtually disappeared. As a result, it is prohibitively expensive for AT&T to continue to make the Affected Services available for new customers. Active customers of the Affected Services will not be losing service with this filing, and prospective customers have many alternative services to choose from (as explained above at pages 15-21).

**Brief Description of the Dates and Method of Notice to All Affected Customers:**

Customer notices were sent via U.S. Mail on October 27, 2023, for retail customers of AT&T Residential Local Service; on October 30, 2023, for retail customers of AT&T Business Local Exchange Service; and on November 16, 2023, for carrier-customers that resell AT&T Residential Local Service and/or AT&T Business Local Exchange Service.<sup>44</sup> Copies of this

---

<sup>44</sup> Example notices are attached at Exhibits 2-4. The customer notice attached as Exhibit 2 is a representative example of a notice that was sent to a retail subscriber of AT&T Residential Local Service in the Affected Service Area within the Troy wire center in Tennessee (TROYTNMT). The Affected Service Area in the map of the wire center located on page 2 of that customer notice is the same Affected Service Area shown in the map of that wire center reflected in Exhibit 57. Other retail subscribers to AT&T Residential Local Service received notices identical to Exhibit 2, attaching the appropriate map for the wire center in which they receive service. Similarly, the customer notice attached as Exhibit 3 is a representative example of a notice that was sent to a retail subscriber of AT&T Business Local Exchange Access Line Service in the Affected Service Area within the Mechanicsburg wire center in Indiana (MCBBIN01). Other retail subscribers to AT&T Business Local Exchange Access Line Service received notices identical to Exhibit 3, attaching the appropriate map(s) for the wire center(s) in which they receive service. Maps of the other wire centers in the Affected Service Area for both Affected Services are included in Exhibits 5 through 64. A representative example of the notice

Application are being sent via first class U.S. Mail to the governor, public utility commission, federally recognized tribes (if any) in the Affected Service Area, and to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.<sup>45</sup>

**Regulatory Classification of Carrier:**

AT&T offers the Affected Services pursuant to non-dominant carrier regulation.

Questions about this application may be addressed to Joshua Woodbridge, AT&T Services, Inc., Director – Federal Regulatory, 601 New Jersey Ave NW, Suite 400, Washington, DC, (202) 709-0554.

---

that was sent to the nine customer-carriers that resell one or both of the Affected Services is attached at Exhibit 4.

<sup>45</sup> Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

## CONCLUSION

For the reasons identified above, the public convenience and necessity will not be adversely affected by the grandfathering of the Affected Services. AT&T respectfully requests the Commission approve its Section 63.71 Application to grandfather services.

By: /s/ Brett Farley

BRETT FARLEY  
DAVID CHORZEMPA  
DAVID LAWSON  
AT&T SERVICES, INC.  
601 New Jersey Ave NW, Suite 400  
Washington, DC 20001

SCOTT H. ANGSTREICH  
KEVIN D. HORVITZ  
JONATHAN I. LIEBMAN  
KELLOGG, HANSEN, TODD,  
FIGEL & FREDERICK, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
(202) 326-7900  
sangstreich@kellogghansen.com  
khorvitz@kellogghansen.com  
jliebman@kellogghansen.com

# **Exhibit 1**

## Customer Data for Affected Services

Data as of 10/25/2023

Wire Center (CLLI)	State	AT&T Business Local Exchange Access Line Service — Line Count <sup>1</sup>	AT&T Business Local Exchange Access Line Service — Customer Count	AT&T Residential Local Service — Line & Customer Count
Big Pine Key (BGPIFLMA)	FL	31	12	11
Fort George (FTGRFLMA)	FL	25	7	25
Fort Lauderdale (FTLDFLAP)	FL	260	30	0
Sugarloaf Key (SGKYFLMA)	FL	28	7	29
Beckemeyer (BCKMILBM)	IL	5	3	22
Cantrall (CNTRILCT)	IL	11	6	91
Fairmount (FAMTILFA)	IL	13	7	28
Fiatt (FIATILFI)	IL	1	1	30
Fithian (FTHNILFT)	IL	5	3	20
Harristown (HRTWILHT)	IL	9	5	33
Indianola (INDNILIN)	IL	1	1	10
Iuka (IUKAILIU)	IL	1	1	49
Kaneville (KAVLILKA)	IL	18	9	32
Lewistown (LWTWILLT)	IL	53	14	106
Schaumburg (SCBGILRS)	IL	10	4	0
St. David (STDVILCS)	IL	7	4	61
Tallula (TALLILTL)	IL	2	2	17
Trivoli (TRIVILTI)	IL	8	4	45
Verona (VRNAILVE)	IL	8	6	41
Mechanicsburg (MCBBIN01)	IN	8	5	63
Solitude (SLTDIN01)	IN	2	2	29
Cornishville (CHVLKYMA)	KY	0	0	20
Ghent (GHNTKYMA)	KY	54	10	34
Hebbardsville (HBVLKYMA)	KY	3	2	31
Woodburn (WDBNKYMA)	KY	3	2	26
Alsatia (LKPRLAAL)	LA	6	3	18
Mer Rouge (MRRGLAMA)	LA	13	8	24
Belleville (BLVLMINE)	MI	11	3	0
Bergland (BRLDMIMN)	MI	7	4	22
Bay Port (BYPTMIMN)	MI	2	2	22

<sup>1</sup> A single business customer in a wire center can and often does order multiple lines. Thus, the “line count” figure is higher than the “customer count” figure in many wire centers.

Wire Center (CLLI)	State	AT&T Business Local Exchange Access Line Service — Line Count	AT&T Business Local Exchange Access Line Service — Customer Count	AT&T Residential Local Service — Line & Customer Count
Chassel (CHSLMIMN)	MI	3	2	35
Michigamme (MCHGMIMN)	MI	14	7	44
Powers (PWRSMIMN)	MI	24	6	55
Sebewaing (SBWNMISB)	MI	13	10	83
Armstrong (ARMSMOCR)	MO	0	0	24
Delta (DELTMO SW)	MO	10	4	29
San Antonio (SNANMOMO)	MO	5	4	38
Brook Park (BKPKOH97)	OH	2	1	0
Milledgeville (MDVLOH94)	OH	7	3	23
Salineville (SAVLOH67)	OH	26	9	102
Cromwell (CRWLOKMA)	OK	3	2	11
Fairmont (FAMTOKMA)	OK	4	2	10
Glencoe (GLCOOKMA)	OK	21	9	32
Headrick (HDRCOKMA)	OK	4	3	3
Mulhall (MLHLOKMA)	OK	1	1	13
Ralston (RLTNOKMA)	OK	5	4	44
Ripley (RPLYOKMA)	OK	22	3	31
Blenheim (BLNHSCMA)	SC	14	7	52
Spartanburg (SPBG SCHW)	SC	62	11	5
Hornbeak (HRNBTNMT)	TN	8	3	53
Nashville (NSVL TNAA)	TN	45	6	0
Cockrill Bend (NSVL TNCD)	TN	105	24	1
Troy (TROY TNMT)	TN	24	10	47
Adamsville (ADVL TXAV)	TX	0	0	14
Bayside (BYSD TXBY)	TX	4	2	2
Goldsmith (GLDSTXGS)	TX	2	1	3
Skidmore (SKDM TXSK)	TX	18	8	20
Westbrook (WSBK TXWB)	TX	10	3	7
Richmond (RCMDWI11)	WI	14	7	49
Van Dyne (VNDNWI11)	WI	2	2	14
<b>Total</b>		<b>1077</b>	<b>269<sup>2</sup></b>	<b>1783<sup>3</sup></b>

<sup>2</sup> This "Total" figure represents the total *unique* AT&T customers of Business Local Exchange Access Line Service across the 60 wire centers, de-duplicating customers that receive service in multiple wire centers. It also includes five carrier-customers, who resell a total of 38 lines of Business Local Exchange Access Line Service (which are included in the 1,077 total line count).

<sup>3</sup> This "Total" figure includes seven AT&T Residential Local Service lines purchased by four carrier-customers.

# **Exhibit 2**



Phone number ending in:



## We'll no longer be accepting orders for traditional landline home phone service in your area

October 27, 2023

Hi [REDACTED],

Effective on or after December 31, 2023 pending regulatory approval, we'll no longer accept new orders for AT&T Residential Local Service in your area.<sup>1</sup> **No action from you is required at this time.** As a current customer, you may continue using your home phone service as you do today. After December 31, no changes to your current home phone services or service location can be made but you can cancel at any time. Take a look at the shaded region within the enclosed map to see where we'll no longer offer new service in your area.<sup>2</sup>

Here's why we're no longer accepting new traditional home phone service orders:

Due to low demand for our traditional land line home phone service in your area, we're no longer offering this service to new customers. New and existing customers can still take advantage of other options for phone service, such as AT&T Phone – Advanced ("AP-A"). Did you know that you can keep your current home phone number if you move to AP-A? We can help with that.

Interested in changing your home phone service to AP-A or exploring other options?

Please call us at **888.994.7035**, Monday - Friday, 7 am - 9 pm CT; Saturday 8 am - 9 pm CT.

Thank you.

AT&T

PO Box 580

Lee's Summit, MO 64063-0580

<sup>1</sup> In the areas impacted by this notice, AT&T Residential Local Service is provided by BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc, d/b/a AT&T Wisconsin.

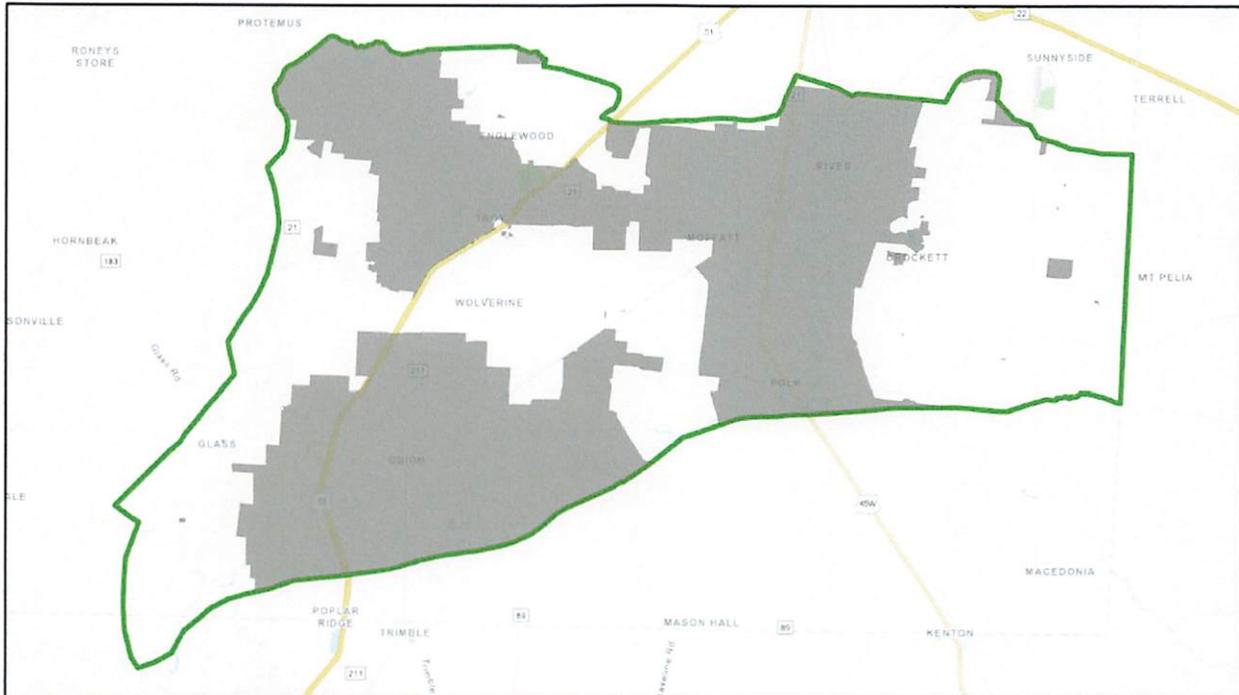
<sup>2</sup> Here is a full list of AT&T wire centers affected by this notice: Florida: Big Pine (BGPIFLMA), Fort George (FTGRFLMA), Fort Lauderdale (FTLDFLAP), Sugarloaf Key (SGKYFLMA); Illinois: Beckemeyer (BCKMILBM), Cantrall (CNTRILCT), Fairmount (FAMTILFA), Fiatt (FIATILFI), Fithian (FTHNILFT), Harristown (HRTWILHT), Indianola (INDNILIN), Iuka (IUKAILIU), Kaneville (KAVLILKA), Lewistown (LWTWILLT), Schaumburg (SCBGILRS), St. David (STDVILCS), Tallula (TALLILTL), Trivoli (TRIVILT), Verona (VRNAILVE); Indiana: Mechanicsburg (MCBBIN01), Solitude (SLTDIN01); Kentucky: Cornishville (CHVLKYMA), Ghent (GHNTKYMA), Hebbardsville (HBVLKYMA), Woodburn (WDBNKYMA); Louisiana: Alsatia (LKPRLAAL), Mer Rouge (MRRGLAMA); Michigan: Belleville (BLVLMINE), Bergland (BRLDMIMN), Bay Port (BYPTMIMN), Chassel (CHSLMIMN), Michiganame (MCHGMIMN), Powers (PWRSMIMN), Sebewaing (SBWNMISB); Missouri: Armstrong (ARMSMOCR), Delta (DELTMOsw), San Antonio (SNANMOMO); Ohio: Brook Park (BPKKOH97), Milledgeville (MDVLOH94), Salineville (SAVLOH67); Oklahoma: Cromwell (CRWLOKMA), Fairmont (FAMTOKMA), Glencoe (GLCOOKMA), Headrick (HRCOKMA), Mulhall (MLHLOKMA), Ralston (RLTNOKMA), Ripley (RPLYOKMA); South Carolina: Blenheim (BLNHSCMA), University Way (SPBGSCHW); Tennessee: Hornbeak (HRNBTNMT), Nashville (NSVLTNAA), Cockrill Bend (NSVLTNCD), Troy (TROYTNMT); Texas: Adamsville (ADVLTXAV), Bayside (BYSDTXBY), Goldsmith (GLDSTXGS), Skidmore (SKDMTXSK), Westbrook (WSBKTXWB); Wisconsin: Richmond (RCMDWI11), Van Dyne (VNDNWI11).



We're required by the FCC to provide the following statement:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 10 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the section 63.71 of BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc, d/b/a AT&T Wisconsin. Comments should include specific information about the impact of this proposed discontinuation (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

## TROY WIRE CENTER, TN (TROYTNMT)



# **Exhibit 3**

October 30, 2023



**Important Notice Regarding AT&T Business Local Exchange Access Line Services  
Effective on or after December 31, 2023**

Thank you for using AT&T<sup>1</sup> for your business service needs. We want to make you aware of planned changes to your **AT&T Business Local Exchange Access Line Service** in certain AT&T wire centers. Our records indicate that you currently purchase AT&T Business Local Exchange Access Line Service within at least one of the AT&T wire centers impacted by these changes.<sup>2</sup> The shaded region within the enclosed map shows where we'll no longer offer new service in your area.

AT&T Business Local Exchange Access Line Service provides individual business customers with telecommunications service within a specified geographical area for local calling and access to and from the telecommunications network for Long Distance Message Telecommunications Service.

**Effective on or after December 31, 2023**, pending regulatory approval, AT&T Business Local Exchange Access Line Services will no longer be available for purchase by new or existing customers. As a current AT&T customer, you may retain your existing service(s) subject to the following changes:

- **Effective on or after December 31, 2023, AT&T will no longer allow new orders, renewal of Service agreements, or requests for physical changes to your Service (including moves to different service addresses), unless your contract expressly allows such orders or changes. Following the expiration of your current term agreement, AT&T will provide Service on a month-to-month basis. During any month-to-month service period, AT&T may change the rates, terms, and conditions of the Service upon notification.**

AT&T offers AT&T Phone for Business with AT&T Business Fiber, AT&T Phone for Business – Advanced, AT&T Office@Hand, and AT&T IP Flexible Reach as replacements for AT&T Business Local Exchange Access Line Services.

Your AT&T Service Representative will contact you to begin discussions regarding alternative solutions that meet your business communication needs.

(Over)

<sup>1</sup> In the areas impacted by this notice, AT&T Business Local Exchange Access Line Service is provided by BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc, d/b/a AT&T Wisconsin.

<sup>2</sup> Here is a full list of AT&T wire centers affected by this notice: **Florida:** Big Pine (BGPIFLMA), Fort George (FTGRFLMA), Fort Lauderdale (FTLDFLAP), Sugarloaf Key (SGKYFLMA); **Illinois:** Beckemeyer (BCKMILBM), Cantrall (CNTRILCT), Fairmount (FAMTILFA), Fiatt (FIATILFI), Fithian (FTHNILFT), Harristown (HRTWILHT), Indianola (INDNILIN), Iuka (IUKAILIU), Kaneville (KAVLILKA), Lewistown (LWTWILLT), Schaumburg (SCBGLRS), St. David (STDVILCS), Tallula (TALLILTL), Trivoli (TRIVILTI), Verona (VRNAILVE); **Indiana:** Mechanicsburg (MCBBIN01), Solitude (SLTDIN01); **Kentucky:** Cornishville (CHVLKYMA), Ghent (GHNTKYMA), Hebbardsville (HBVLKYMA), Woodburn (WDBNKYMA); **Louisiana:** Alsatia (LKPRLAAL), Mer Rouge (MRRGLAMA); **Michigan:** Belleville (BLVLMINE), Bergland (BRLDMIMN), Bay Port (BYPTMIMN), Chassel (CHSLMIMN), Michigamme (MCHGMIMN), Powers (PWRSMIMN), Sebewaing (SBWNMISB); **Missouri:** Armstrong (ARMSMOCR), Delta (DELTMOsw), San Antonio (SNANMOMO); **Ohio:** Brook Park (BKP KOH97), Milledgeville (MDVLOH94), Salineville (SAVLOH67); **Oklahoma:** Cromwell (CRWLOKMA), Fairmont (FAMTOKMA), Glencoe (GLCOOKMA), Headrick (HRCOKMA), Mulhall (MLHLOKMA), Ralston (RLTNOKMA), Ripley (RPLYOKMA); **South Carolina:** Blenheim (BLNHSCMA), Spartanburg (SPBGSCHW); **Tennessee:** Hornbeak (HRNBTNMT), Nashville (NSVLTNAA), Cockrill Bend (NSVLTNCD), Troy (TROYTNMT); **Texas:** Adamsville (ADVLTXAV), Bayside (BYSDTXBY), Goldsmith (GLDSTXGS), Skidmore (SKDMTXSK), Westbrook (WSBKTXWB); **Wisconsin:** Richmond (RCMDW111), Van Dyne (VNDNW111).

Sincerely,  
AT&T Business Services  
208 S. Akard Street  
Dallas, Texas 75202

**AT&T is required by the FCC to provide the following statement:**

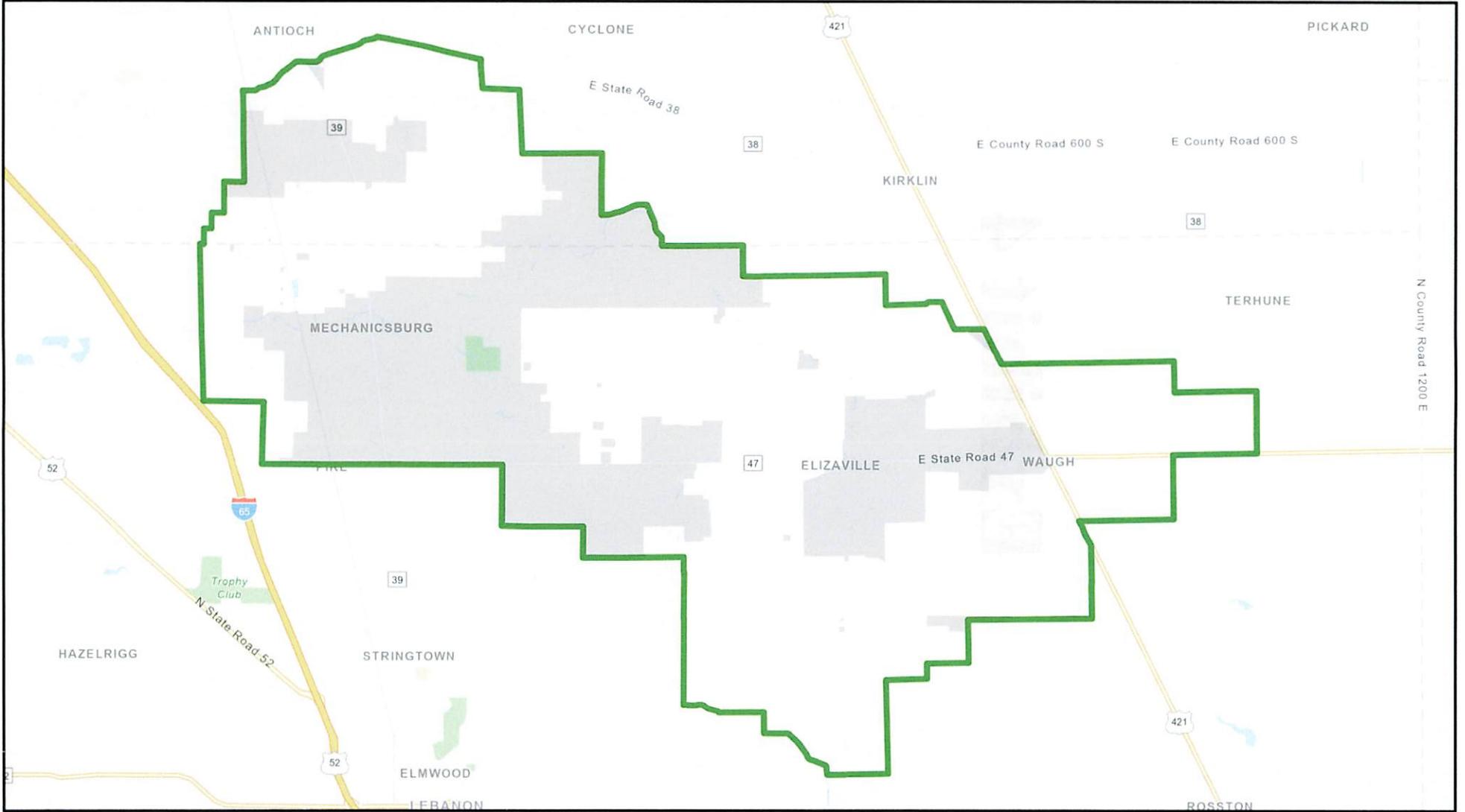
The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 10 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the section 63.71 Application of BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc, d/b/a AT&T Wisconsin. Comments should include specific information about the impact of this proposed discontinuation (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

**Service Addresses in Areas Impacted by this Notice:**

SERVICE ADDRESS	SERVICE CITY	SERVICE STATE	SERVICE ZIP

# MECHANICSBURG WIRE CENTER, IN (MCBBIN01)

135



# **Exhibit 4**



November 16, 2023

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Important Notice Regarding AT&T Business Local Exchange Access Line and AT&T Residential Local Services  
Effective on or after December 31, 2023**

Thank you for using AT&T<sup>1</sup> for your business service needs. We want to make you aware of planned changes to **AT&T Business Local Exchange Access Line Service and AT&T Residential Local Service** in certain AT&T wire centers. Our records indicate that you currently purchase AT&T Business Local Exchange Access Line Service or AT&T Residential Local Service within at least one of the AT&T wire centers impacted by these changes.<sup>2</sup>

AT&T Business Local Exchange Access Line Service and AT&T Residential Local Service provide individual business customers with telecommunications service within a specified geographical area for local calling and access to and from the telecommunications network for Long Distance Message Telecommunications Service.

**Effective on or after December 31, 2023**, pending regulatory approval, AT&T Business Local Exchange Access Line Service and AT&T Residential Local Service will no longer be available for purchase by new or existing customers. As a current AT&T customer, you may retain your existing service(s) subject to the following changes:

- **Effective on or after December 31, 2023, AT&T will no longer allow new orders, renewal of Service agreements, or requests for physical changes to your Service (including moves to different service addresses), unless your contract expressly allows such orders or changes. Following the expiration of your current term agreement, AT&T will provide Service on a month-to-month basis. During any month-to-month service period, AT&T may change the rates, terms, and conditions of the Service upon notification.**

AT&T offers AT&T Phone for Business with AT&T Business Fiber, AT&T Phone for Business – Advanced, AT&T Office@Hand, and AT&T IP Flexible Reach as replacements for AT&T Business Local Exchange Access Line and AT&T Phone – Advanced for AT&T Residential Local Services.

Your AT&T Service Representative will contact you to begin discussions regarding alternative solutions that meet your business communication needs.

Sincerely,  
AT&T Business Services  
208 S. Akard Street  
Dallas, Texas 75202

(Over)

<sup>1</sup> In the areas impacted by this notice, AT&T Business Local Exchange Access Line Service and AT&T Residential Local Service are provided by BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc, d/b/a AT&T Wisconsin.

<sup>2</sup> Here is a full list of AT&T wire centers affected by this notice: **Florida:** Big Pine (BGPIFLMA), Fort George (FTGRFLMA), Fort Lauderdale (FTLDLFLAP), Sugarloaf Key (SGKYFLMA); **Illinois:** Beckemeyer (BCKMLBMB), Cantrall (CNTRILCT), Fairmount (FAMTILFA), Fiatt (FIATILFI), Fithian (FTHNILFT), Harristown (HRTWILHT), Indianola (INDNILIN), Iuka (IUKAILIU), Kaneville (KAVLILKA), Lewistown (LWTWILLT), Schaumburg (SCBGILRS), St. David (STDVILCS), Tallula (TALLILTL), Trivoli (TRIVILT), Verona (VRNAILVE); **Indiana:** Mechanicsburg (MCBBIN01), Solitude (SLTDIN01); **Kentucky:** Cornishville (CHVLKYMA), Ghent (GHNTKYMA), Hebbardsville (HBVLKYMA), Woodburn (WDBNKYMA); **Louisiana:** Alsatia (LKPRLAAL), Mer Rouge (MRRGLAMA); **Michigan:** Belleville (BLVLMINE), Bergland (BRLDMIMN), Bay Port (BYPTMIMN), Chassel (CHSLMIMN), Michigamme (MCHGMIMN), Powers (PWRSMIMN), Sebewaing (SBWNMISB); **Missouri:** Armstrong (ARMSMOCR), Delta (DELTOSW), San Antonio (SNANMOMO); **Ohio:** Brook Park (BKPKOH97), Milledgeville (MDVLOH94), Salineville (SAVLOH67); **Oklahoma:** Cromwell (CRWLOKMA), Fairmont (FAMTOKMA), Glencoe (GLCOOKMA), Headrick (HDRCOKMA), Mulhall (MLHLOKMA), Ralston (RLTNOKMA), Ripley (RPLYOKMA); **South Carolina:** Blenheim (BLNHSCMA), Spartanburg (SPBG5CHW); **Tennessee:** Hornbeak (HRNBTNMT), Nashville (NSVLTNAA), Cockrill Bend (NSVLTNCD), Troy (TROYTNMT); **Texas:** Adamsville (ADVLTXAV), Bayside (BYSDTXBY), Goldsmith (GLDSTXGS), Skidmore (SKDMTXSK), Westbrook (WSBKTXWB); **Wisconsin:** Richmond (RCMDWI11), Van Dyne (VNDNWI11).

**AT&T is required by the FCC to provide the following statement:**

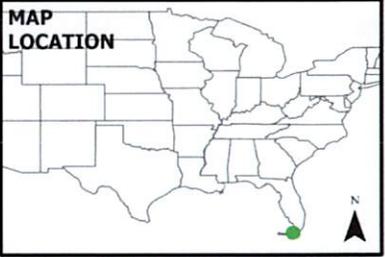
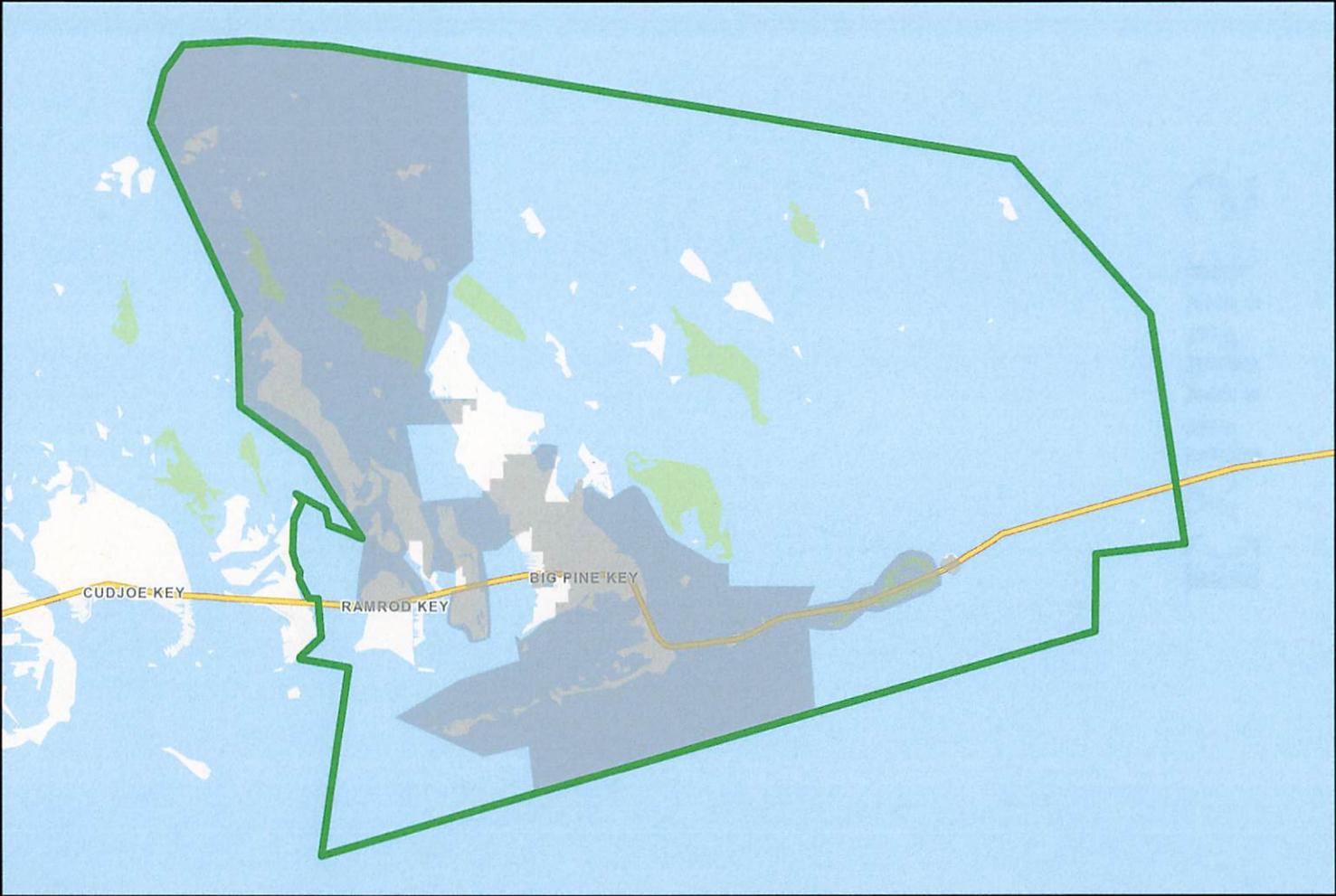
The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 10 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the section 63.71 Application of BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Kentucky, AT&T Louisiana, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, Inc, d/b/a AT&T Wisconsin. Comments should include specific information about the impact of this proposed discontinuation (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

# **Exhibit 5**

# BIG PINE WIRE CENTER, FL (BGPIFLMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	11	31



Center: 81°19'52"W 24°42'26"N

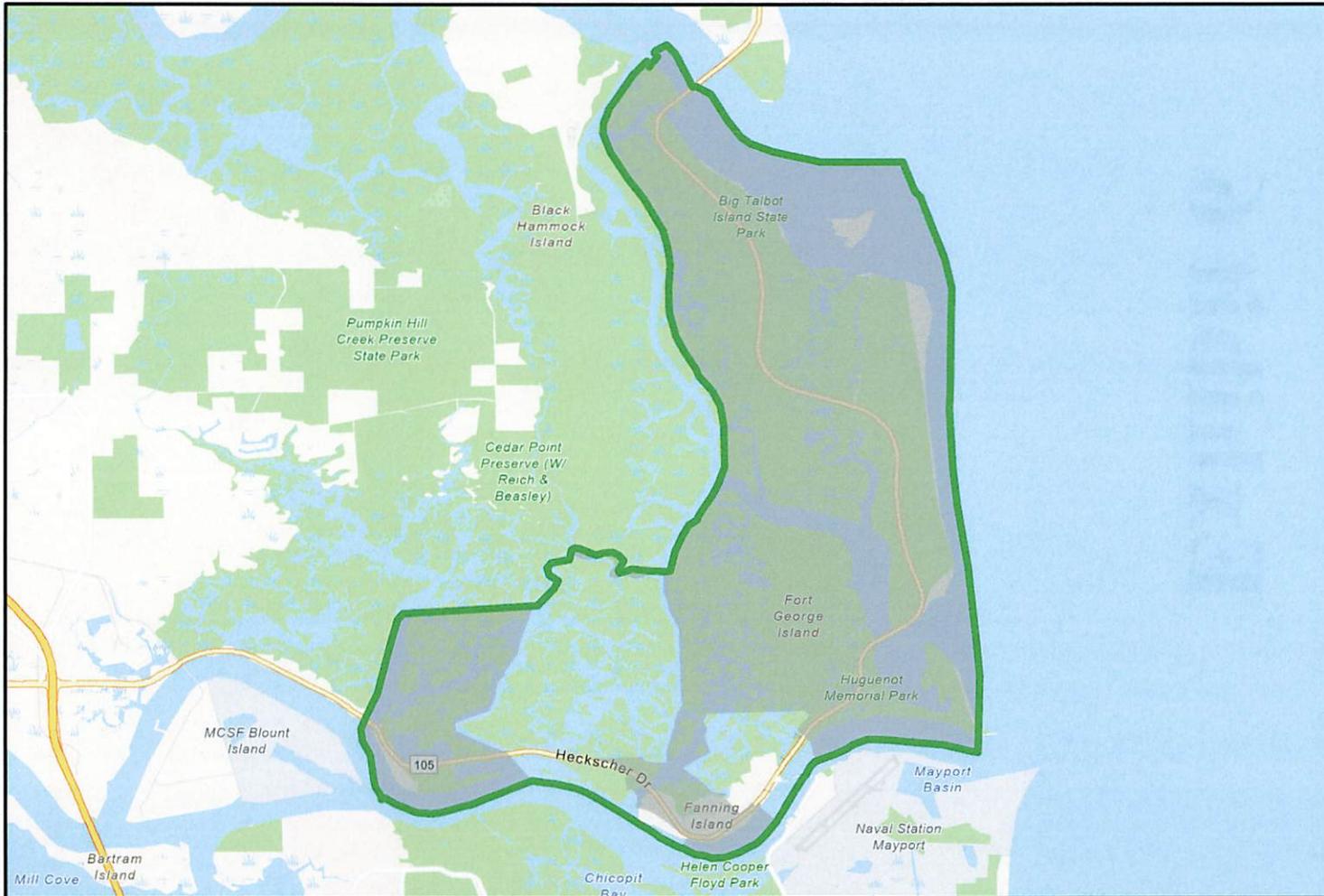


# **Exhibit 6**

# FORT GEORGE WIRE CENTER, FL (FTGRFLMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	25	25



Center: 81°27'20"W 30°27'11"N



# **Exhibit 7**

# AIRPORT WIRE CENTER, FL (FTLDFLAP)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	0	260



Center: 80°9'4"W 26°4'20"N



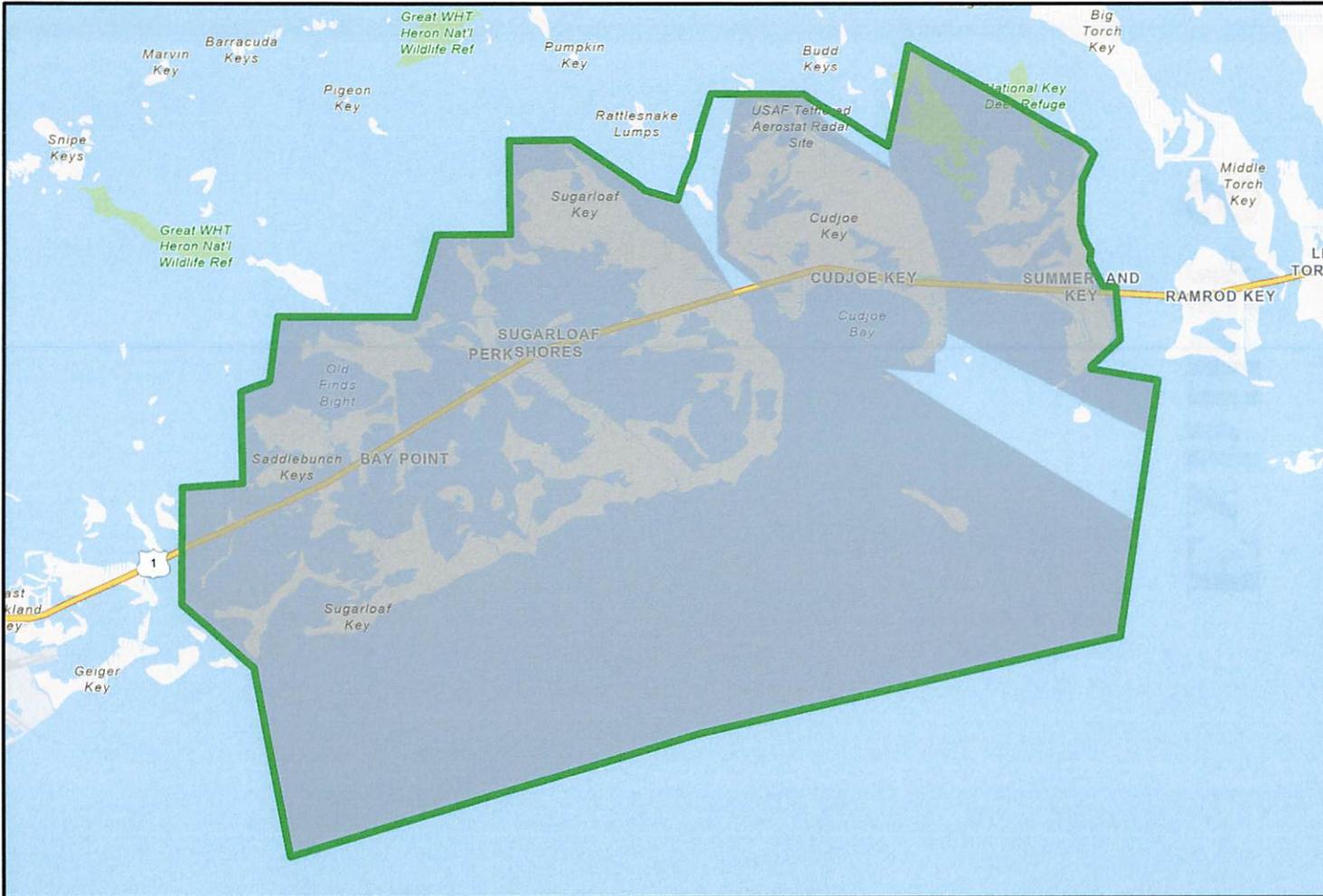
AT&T

# **Exhibit 8**

# SUGARLOAF WIRE CENTER, FL (SGKYFLMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	29	28



Center: 81°32'W 24°37'35"N

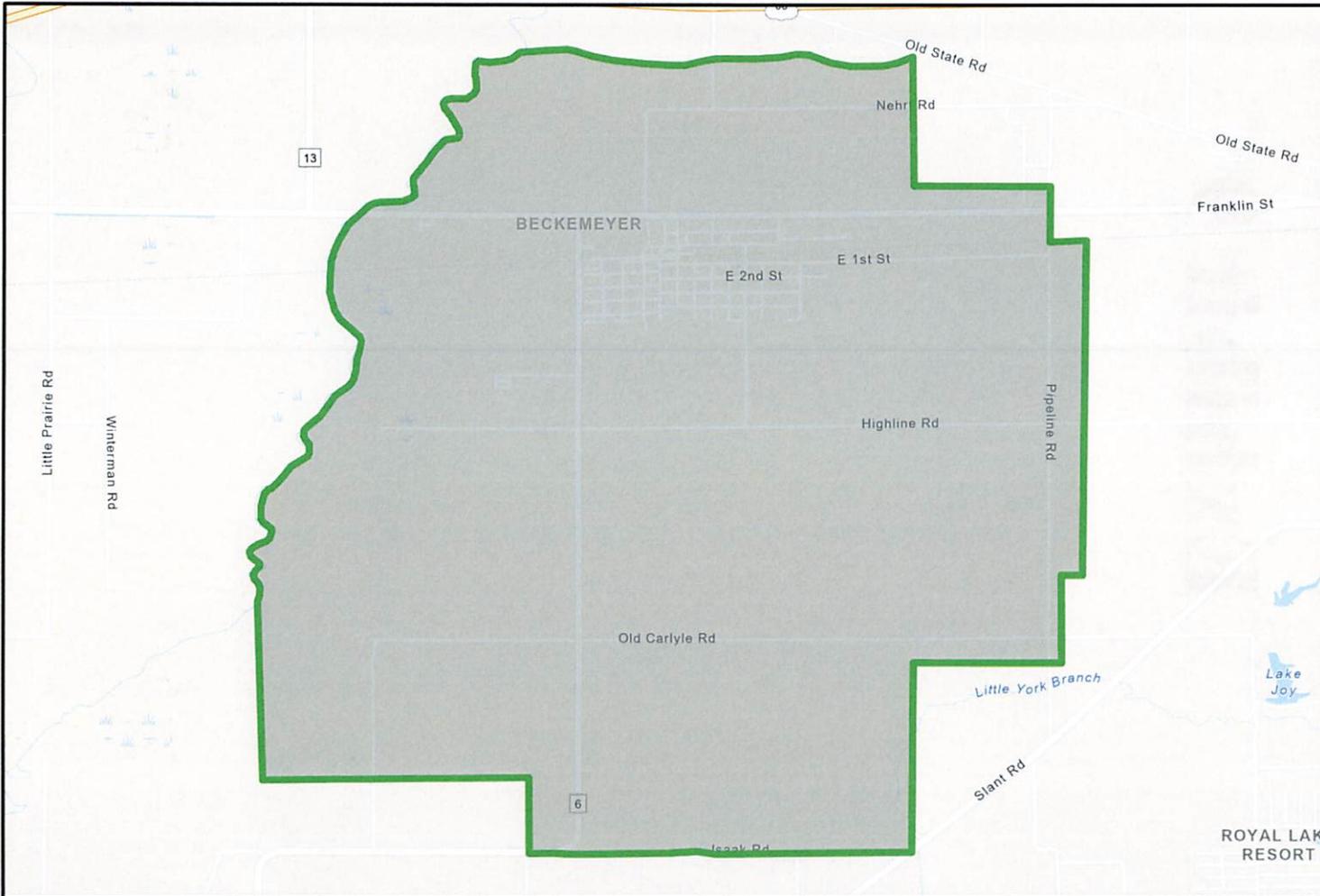


# **Exhibit 9**

# BECKEMEYER WIRE CENTER, IL (BCKMILBM)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	22	5



Center: 89°26'12"W 38°35'34"N

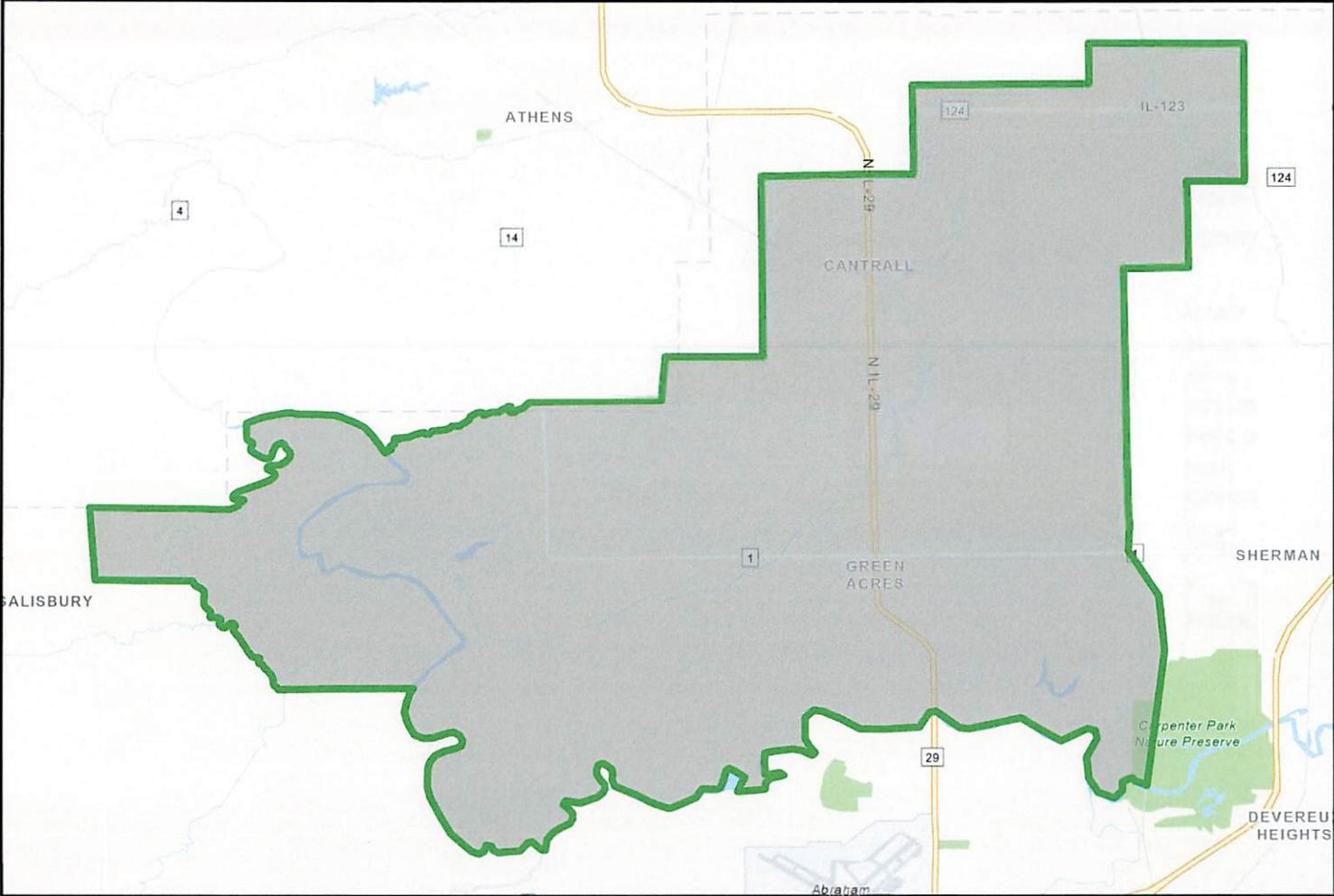


# **Exhibit 10**

# CANTRALL WIRE CENTER, IL (CNTRILCT)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	91	11



Center: 89°42'15"W 39°54'40"N

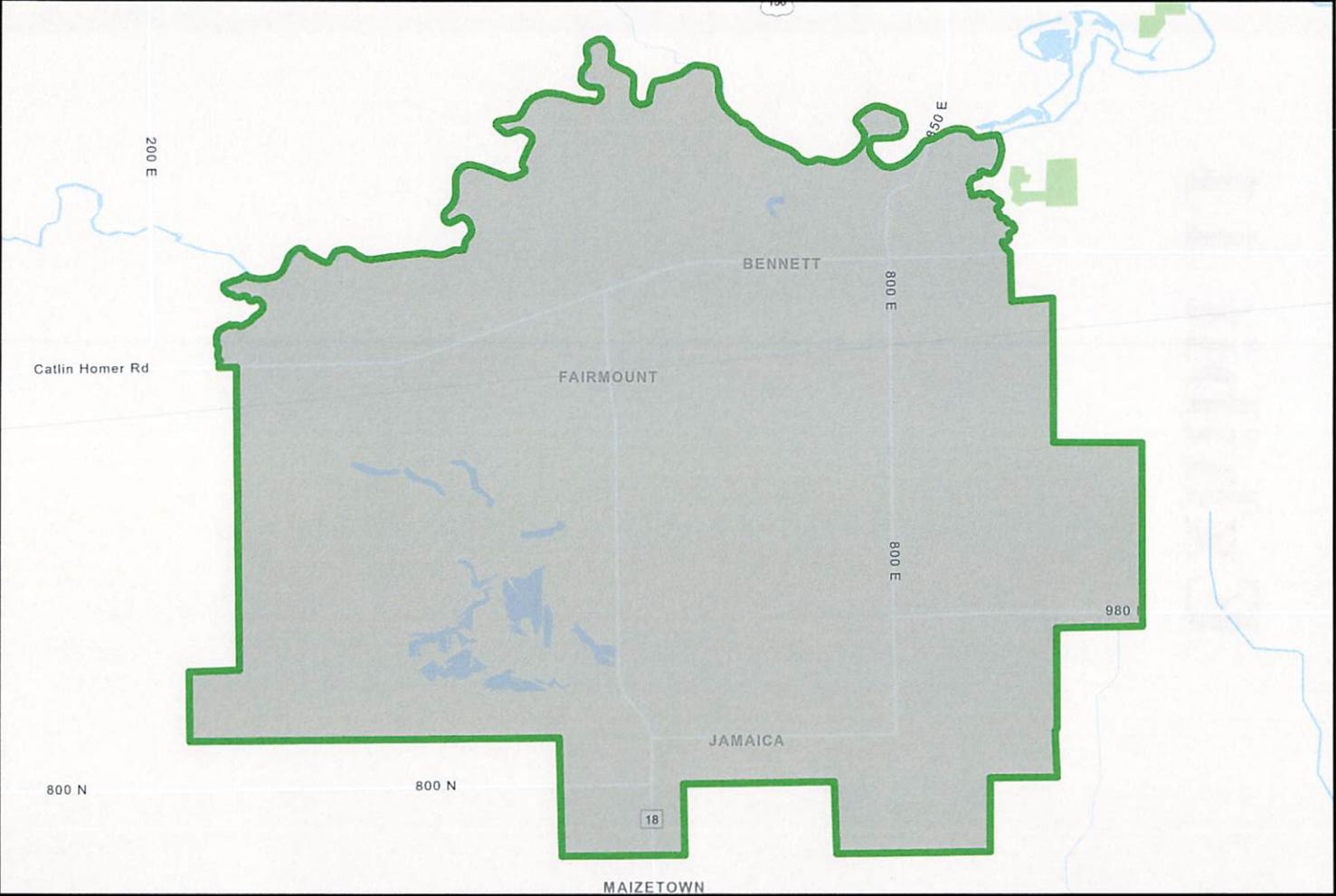


# **Exhibit 11**

# FAIRMOUNT WIRE CENTER, IL (FAMTILFA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	28	13



Center: 87°49'19"W 40°2'7"N

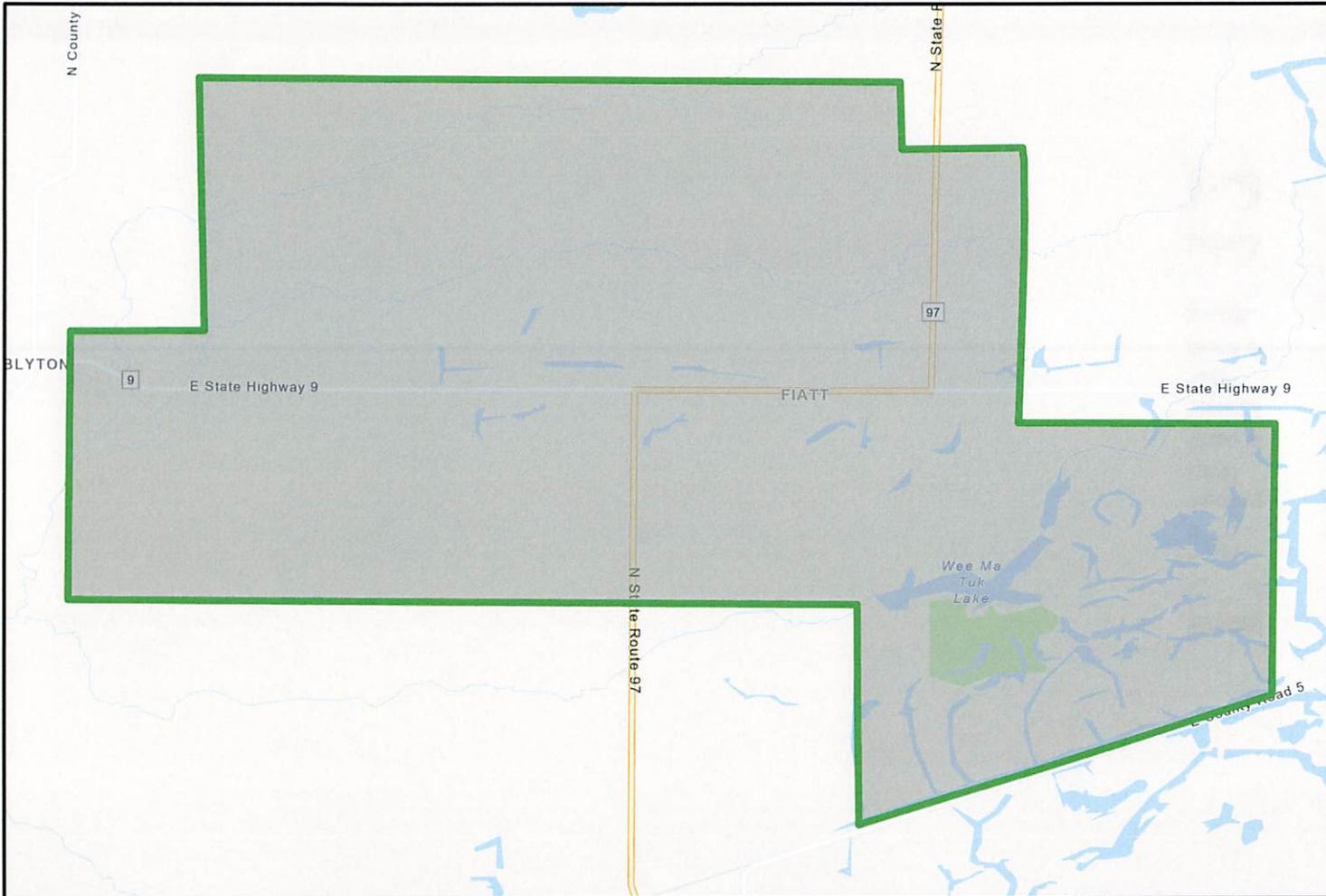


# **Exhibit 12**

# FIATT WIRE CENTER, IL (FIATILFI)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	30	1



Center: 90°11'40"W 40°33'9"N



# **Exhibit 13**

# FITHIAN WIRE CENTER, IL (FTHNILFT)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	20	5



Center: 87°51'57"W 40°7'8"N

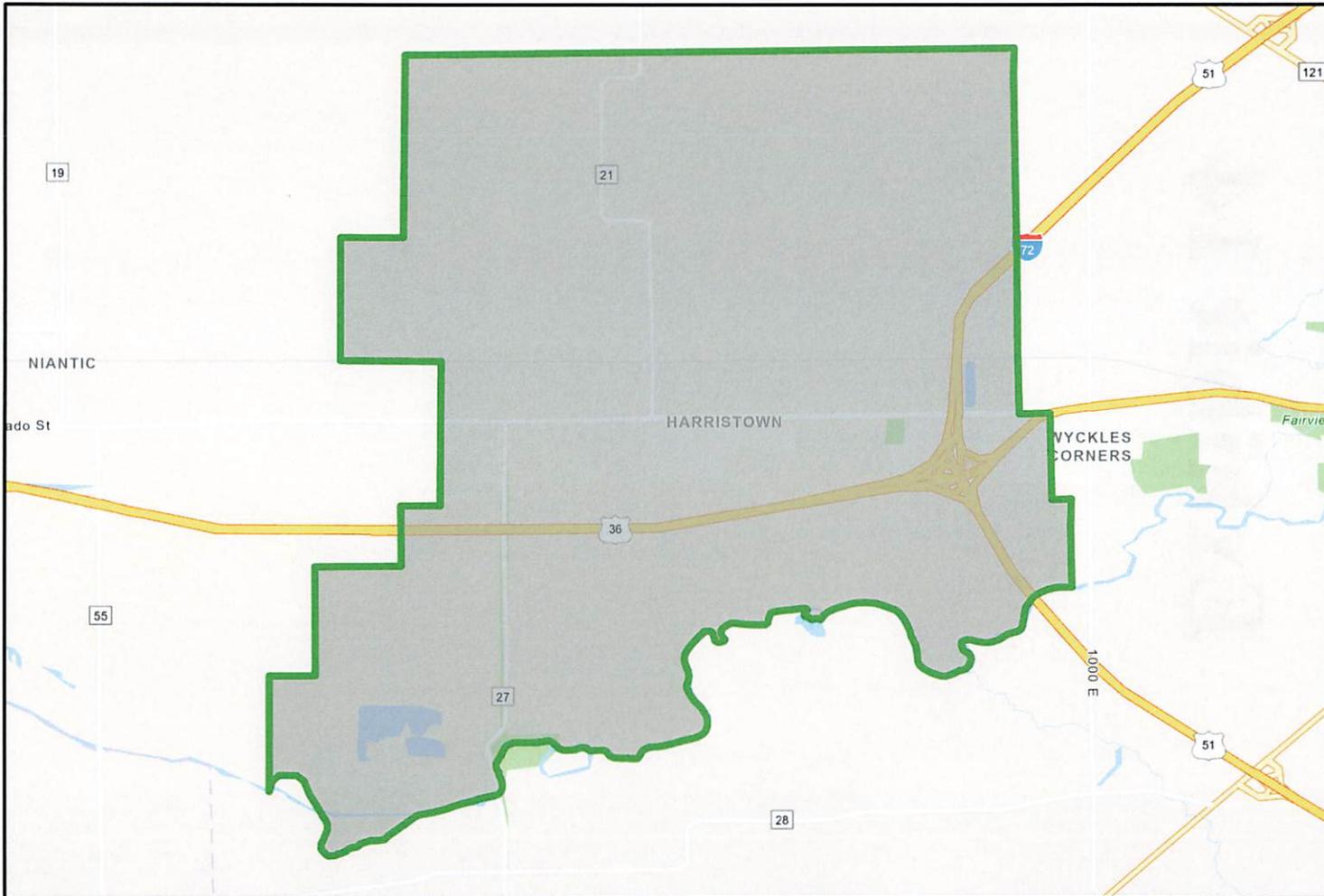


# **Exhibit 14**

# HARRISTOWN WIRE CENTER, IL (HRTWILHT)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	33	9



Center: 89°4'58"W 39°50'28"N

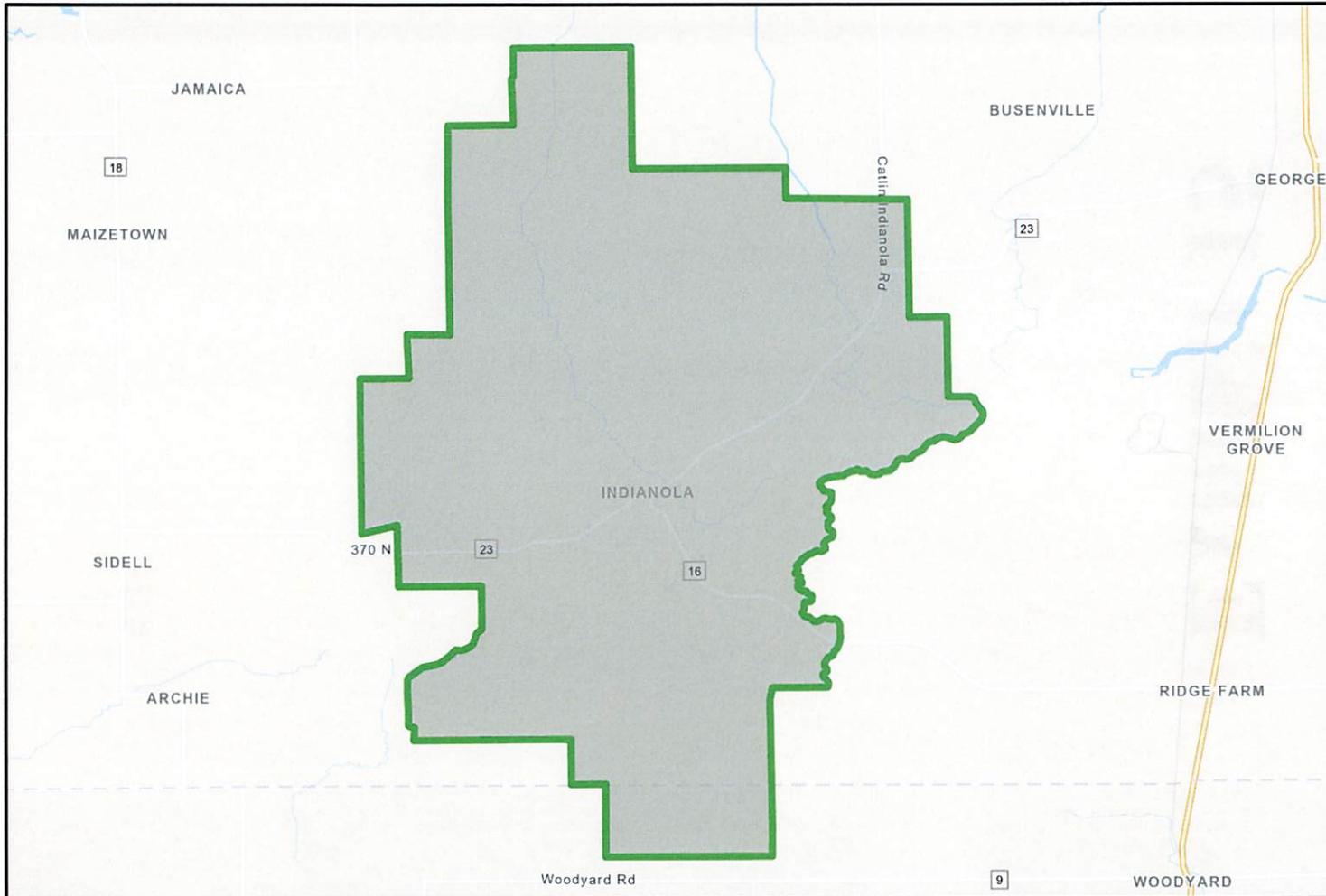


# **Exhibit 15**

# INDIANOLA WIRE CENTER, IL (INDNILIN)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	10	1



Center: 87°44'11"W 39°55'59"N

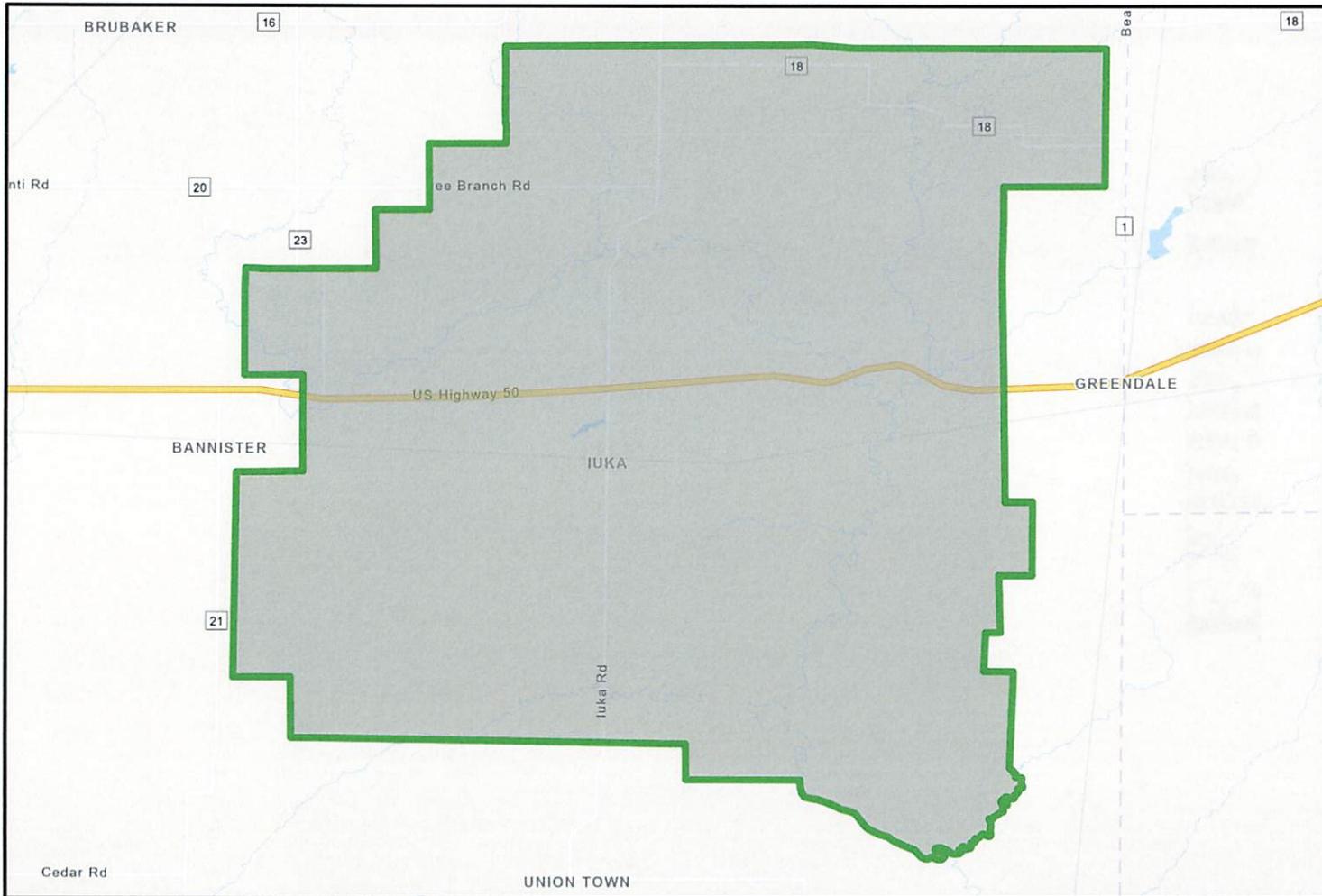


# **Exhibit 16**

# IUKA WIRE CENTER, IL (IUKAILIU)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	49	1



Center: 88°46'45"W 38°37'1"N

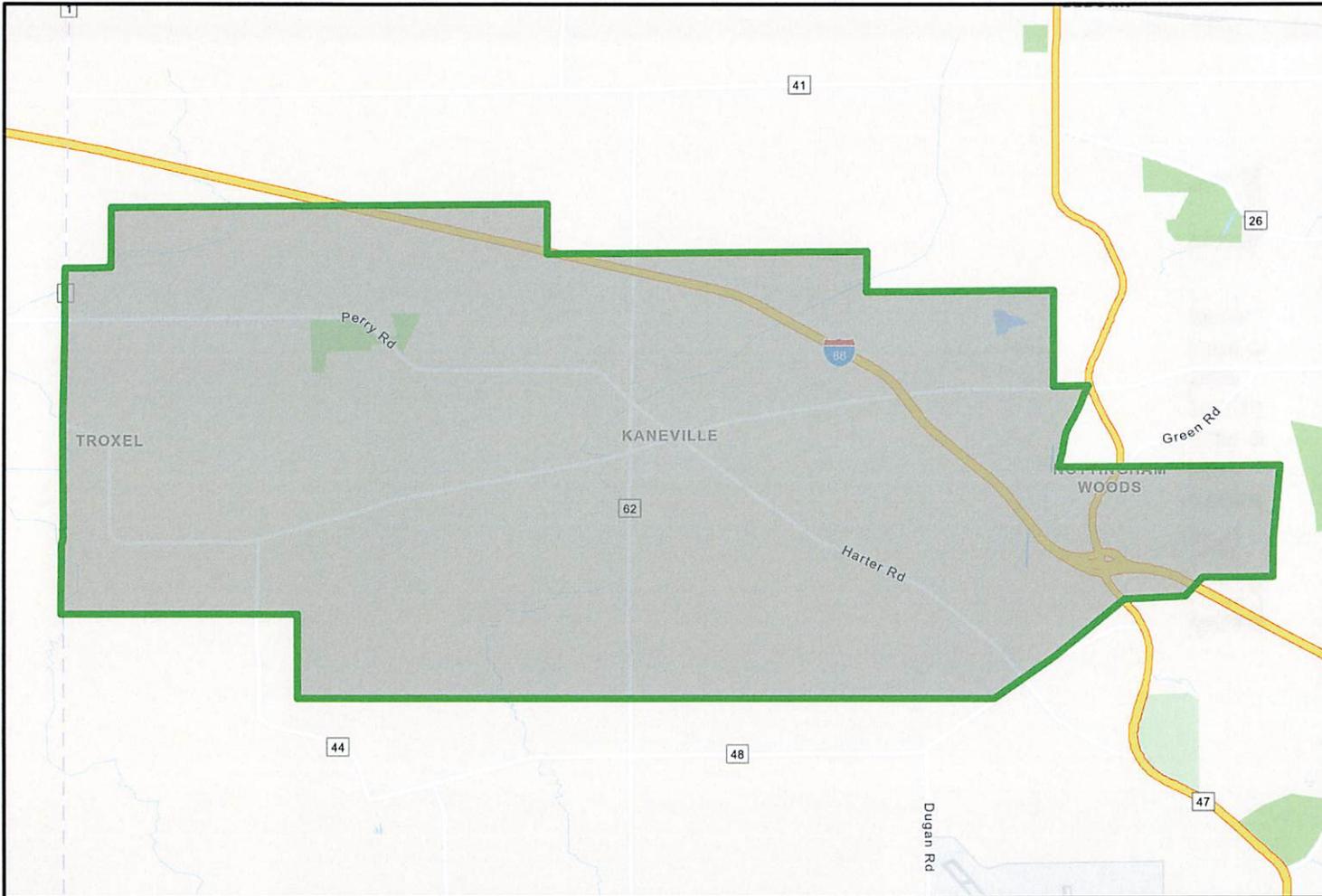


# **Exhibit 17**

# KANEVILLE WIRE CENTER, IL (KAVLILKA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	32	18



Center: 88°31'23"W 41°50'N

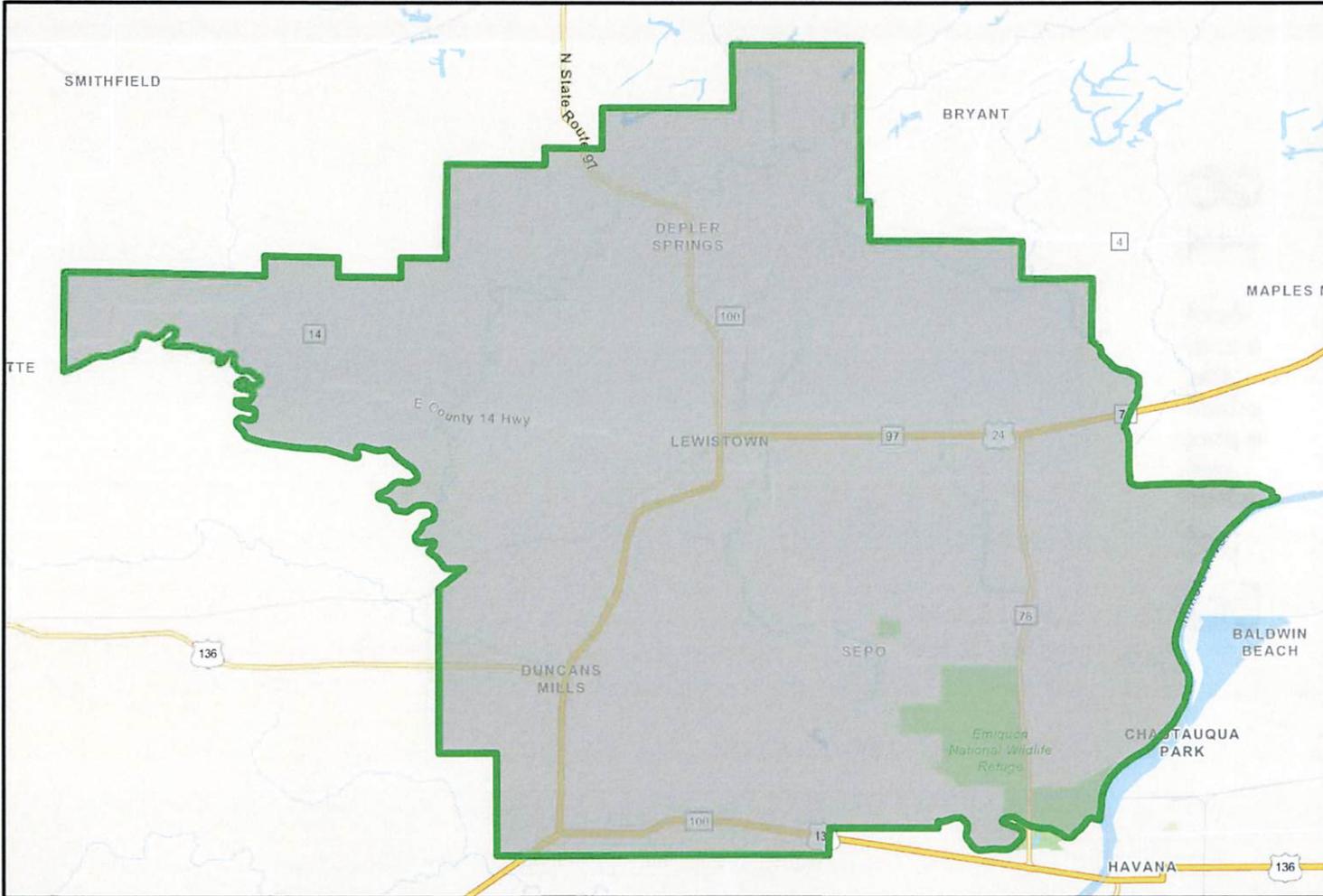


# **Exhibit 18**

# LEWISTOWN WIRE CENTER, IL (LWTWILLT)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	106	53



Center: 90°10'W 40°23'25"N

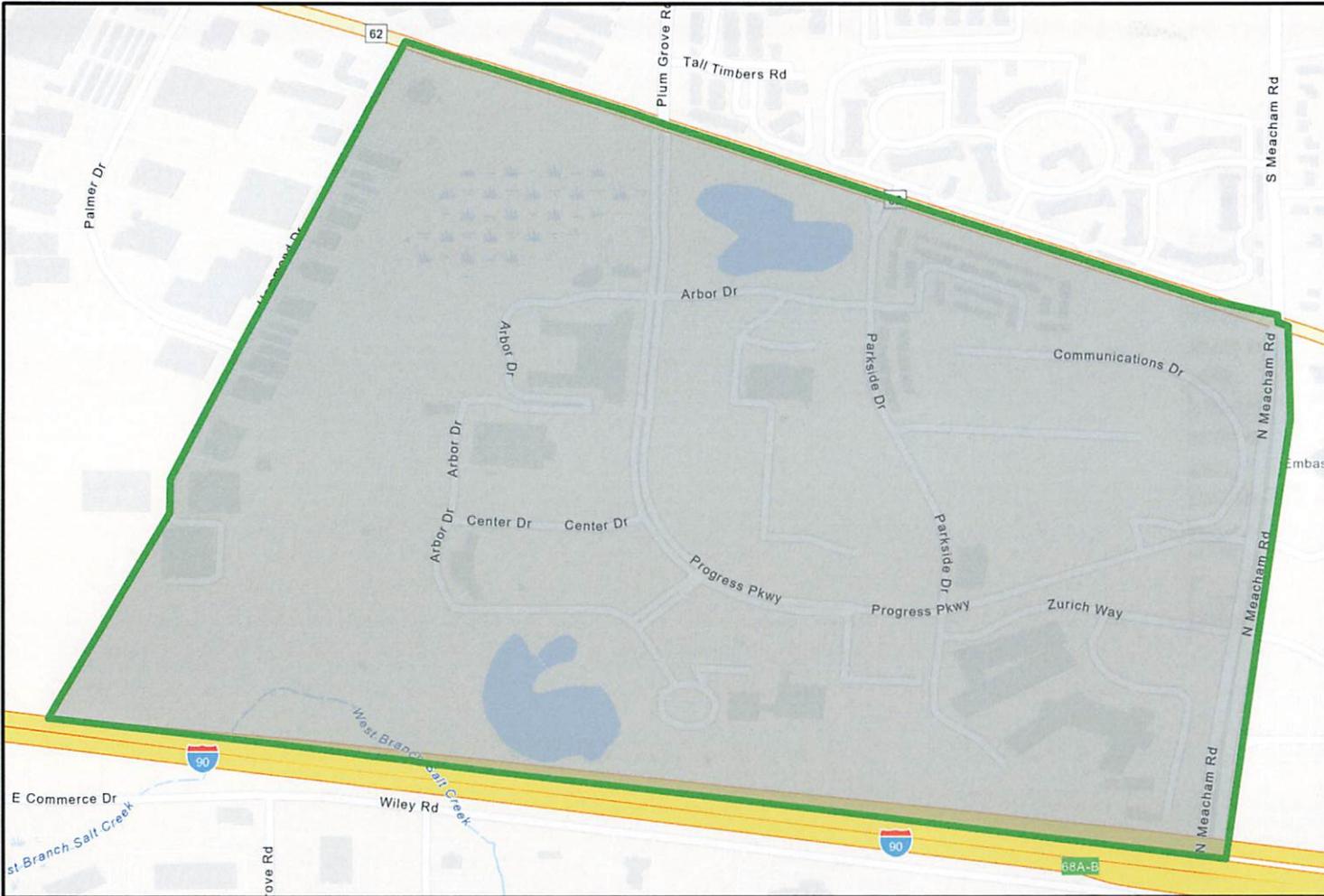


# **Exhibit 19**

# SCHAUMBURG NORTH WIRE CENTER, IL (SCBGILRS)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	0	10



Center: 88°3'13"W 42°3'59"N

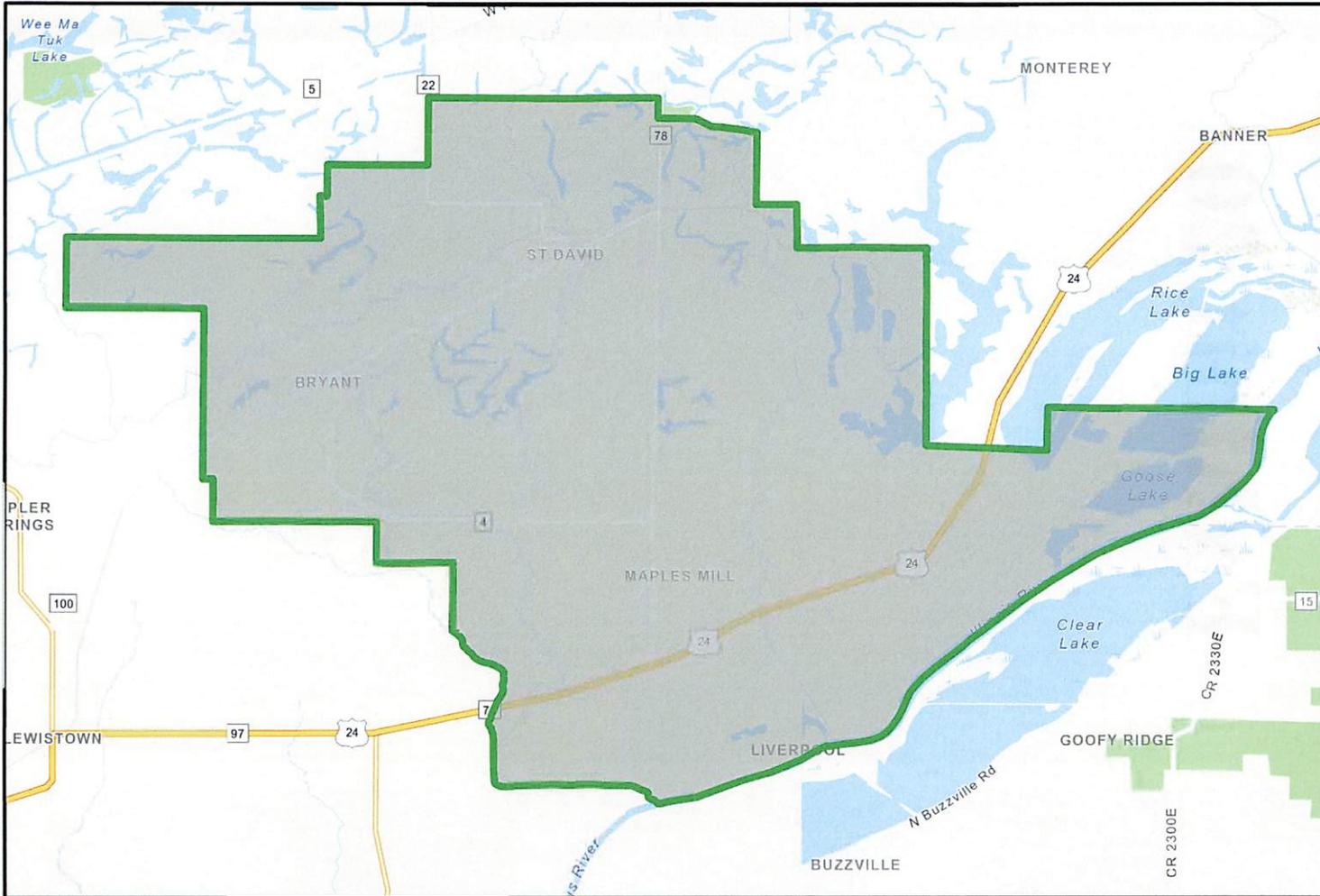


# **Exhibit 20**

# ST. DAVID WIRE CENTER, IL (STDVILCS)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	61	7



Center: 90°1'39"W 40°27'5"N

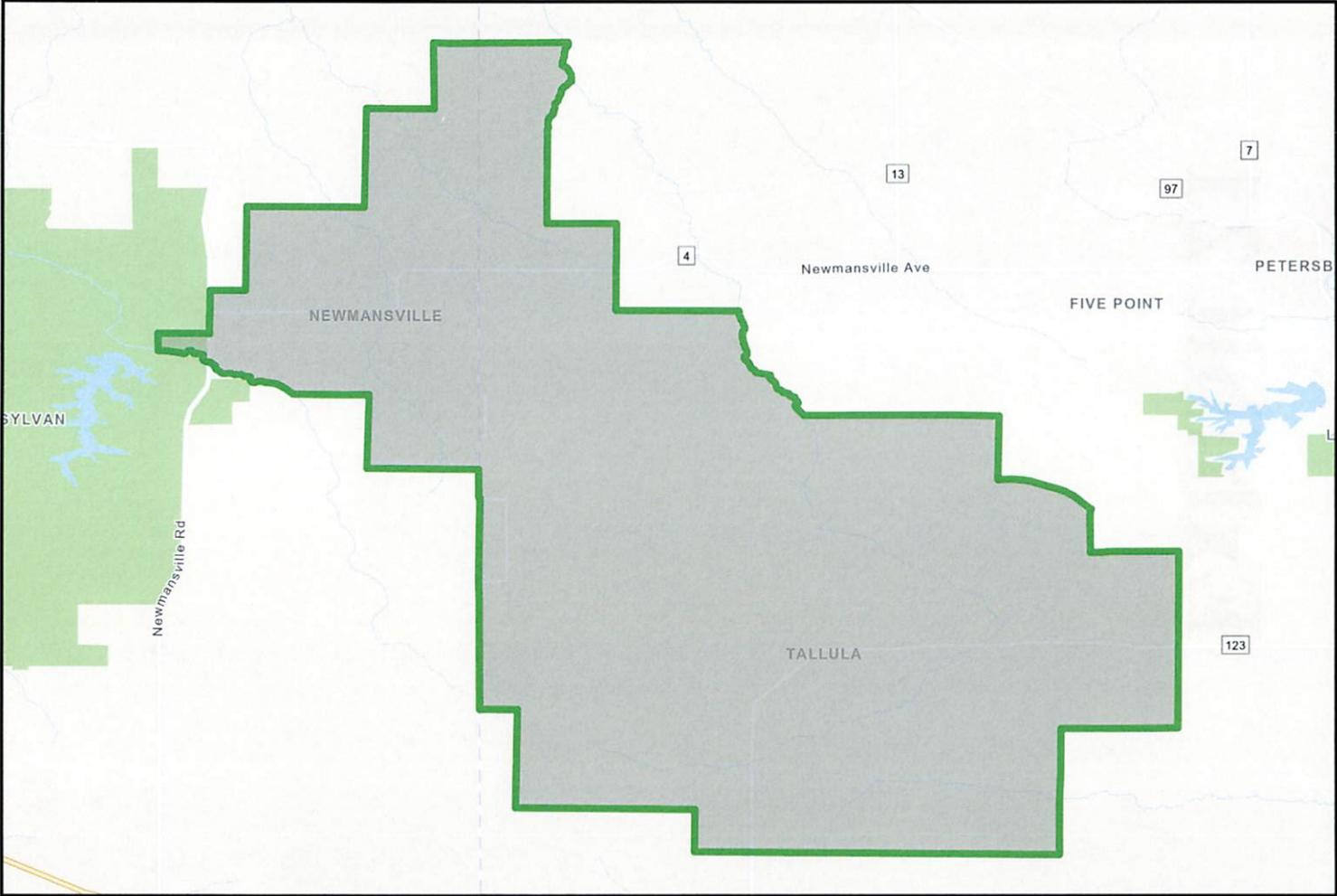


# **Exhibit 21**

# TALLULA WIRE CENTER, IL (TALLILTL)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	17	2



Center: 89°57'43"W 39°58'47"N

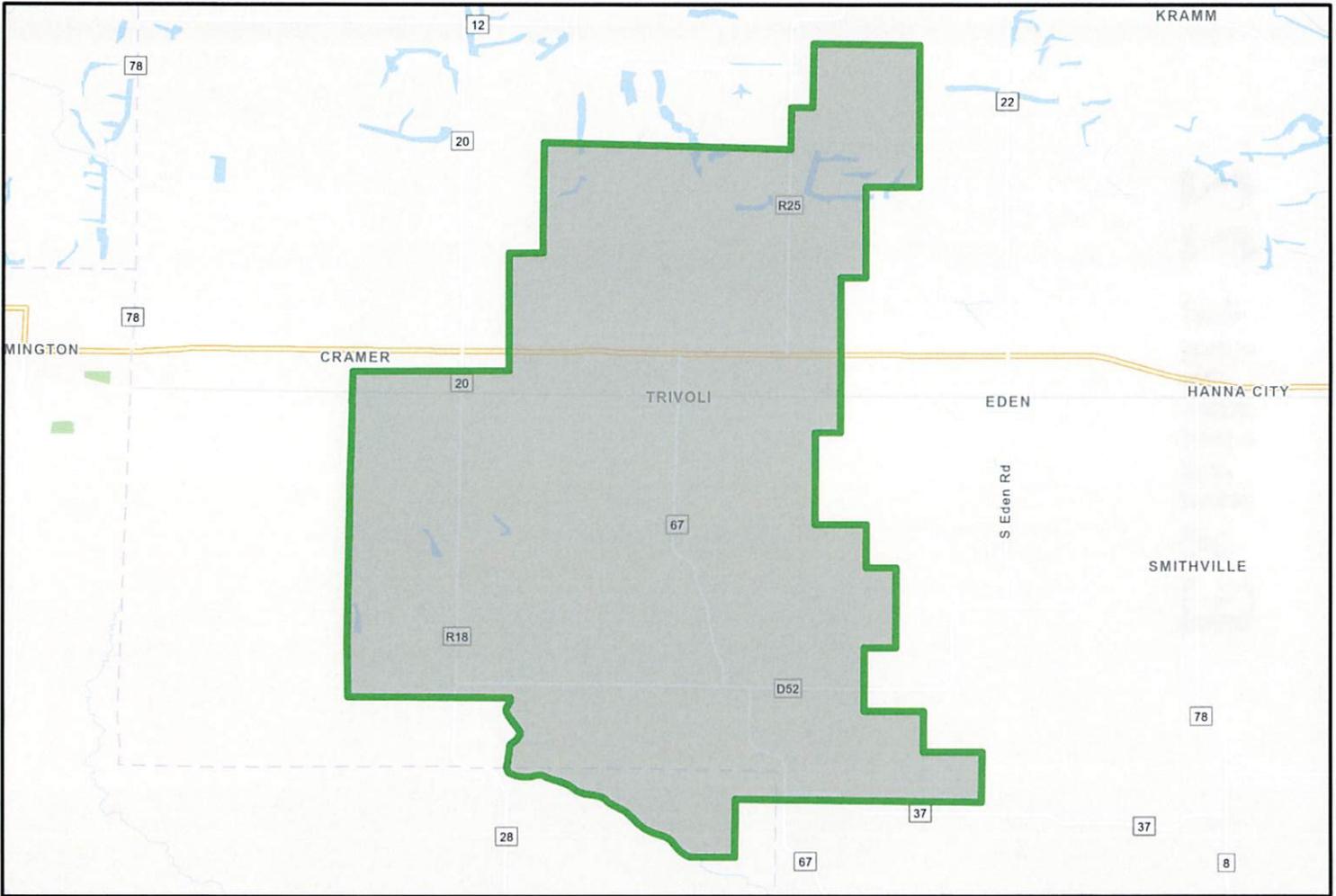


# **Exhibit 22**

# TRIVOLI WIRE CENTER, IL (TRIVILTI)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	45	8



Center: 89°53'35"W 40°40'51"N



# **Exhibit 23**

# VERONA WIRE CENTER, IL (VRNAILVE)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	41	8



Center: 88°30'58"W 41°13'27"N

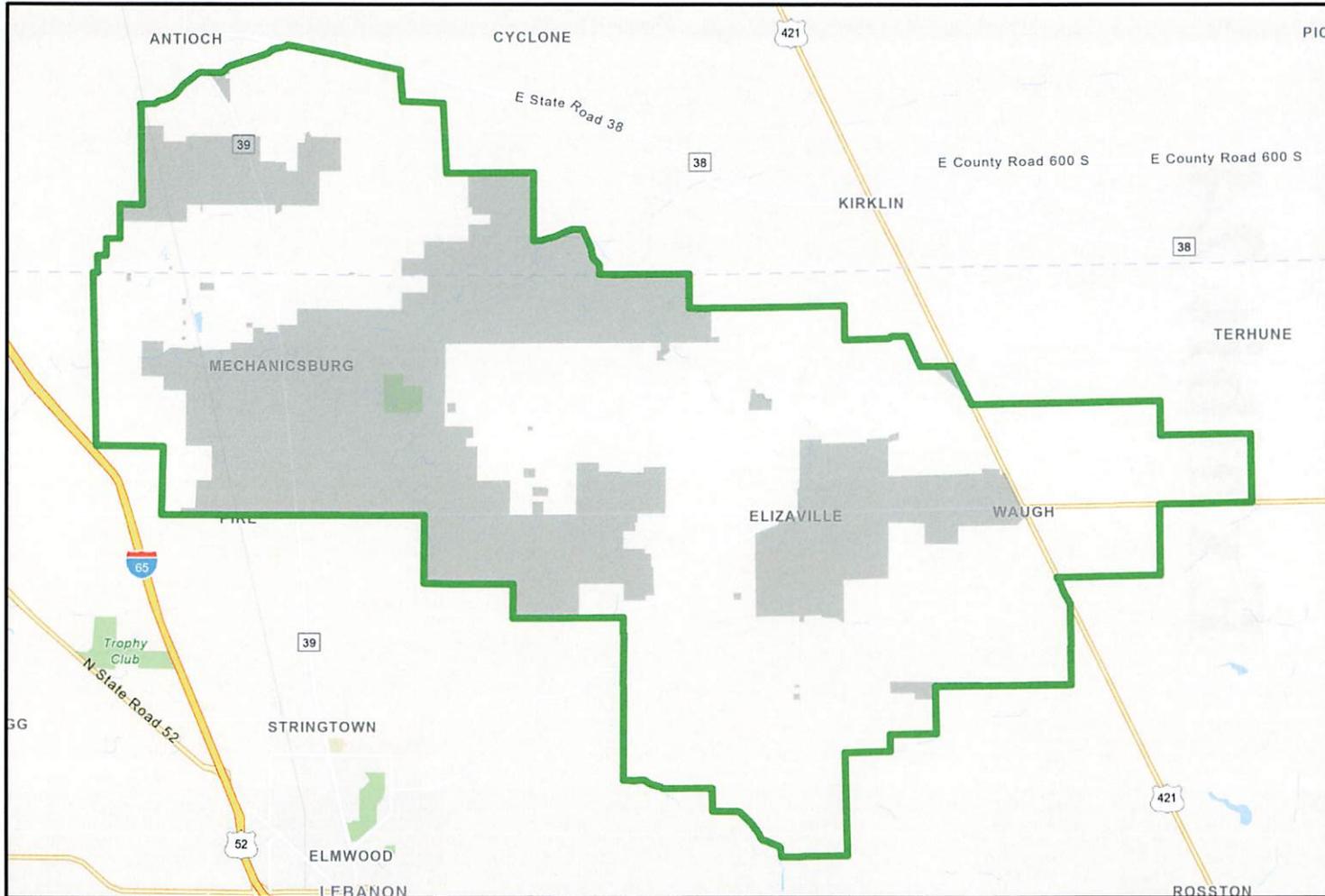


# **Exhibit 24**

# MECHANICSBURG WIRE CENTER, IN (MCBBIN01)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	63	8



Center: 86°24'9"W 40°8'23"N

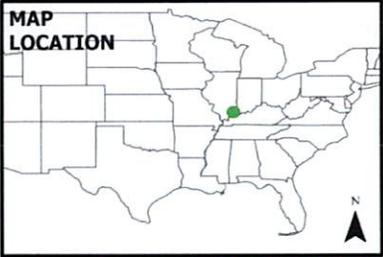
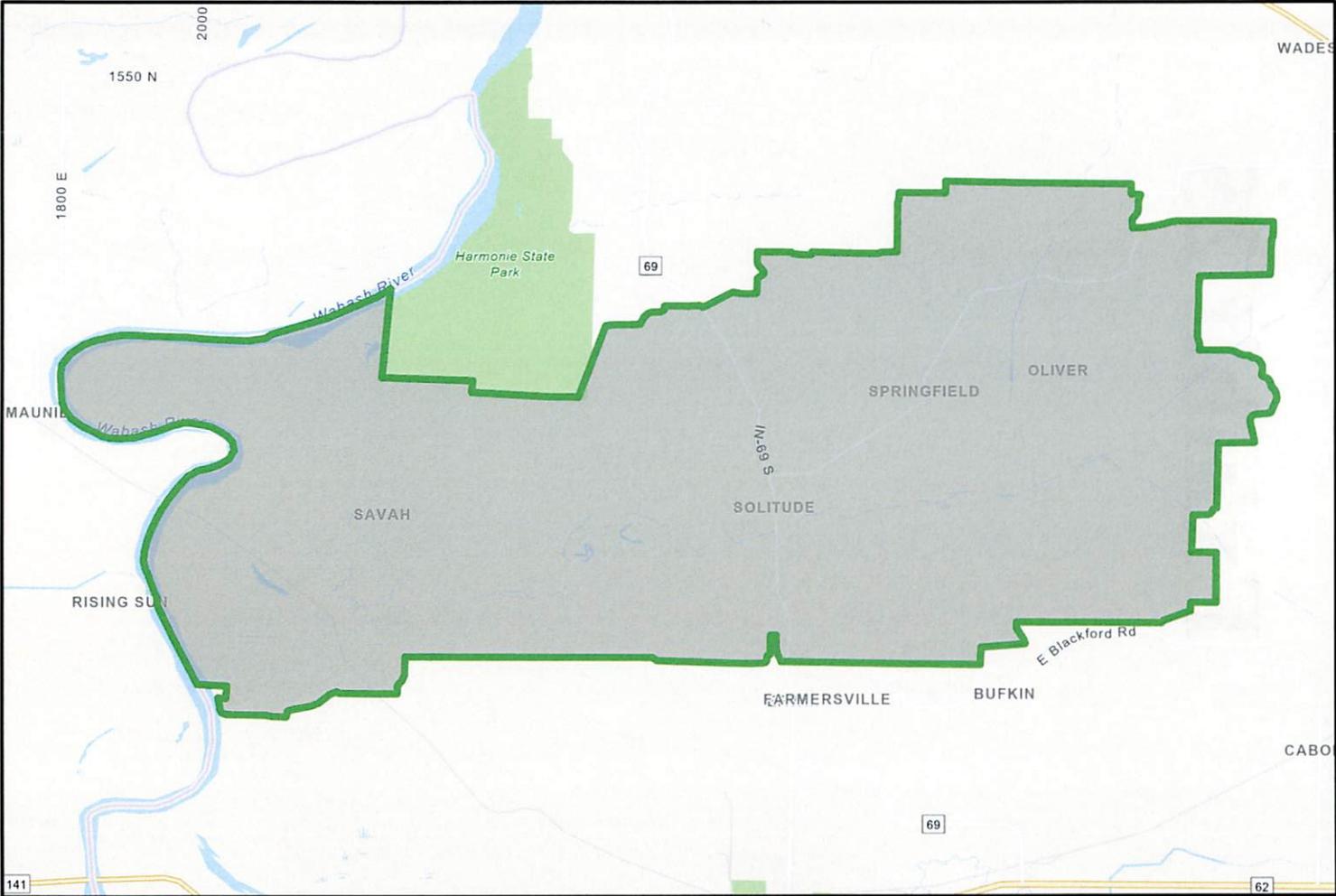


# **Exhibit 25**

# SOLITUDE WIRE CENTER, IN (SLTDIN01)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	29	2



Center: 87°55'17"W 38°1'46"N

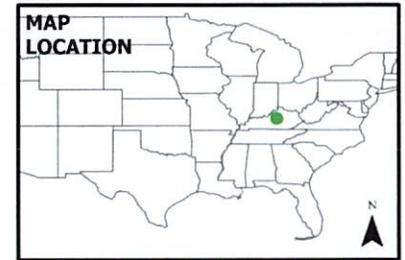
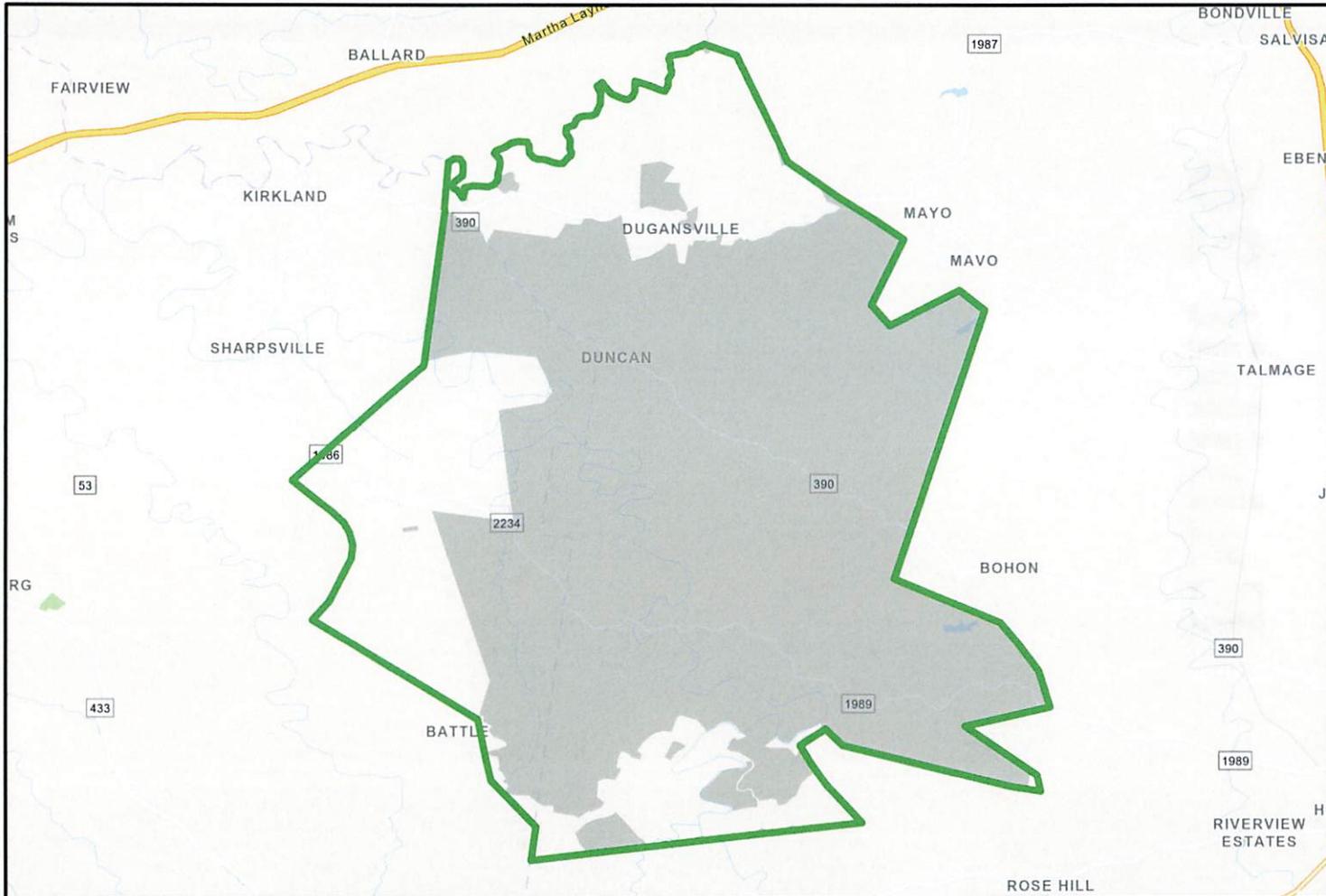


# **Exhibit 26**

# CORNISHVILLE WIRE CENTER, KY (CHVLKYMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	20	0



Center: 84°59'10"W 37°50'1"N

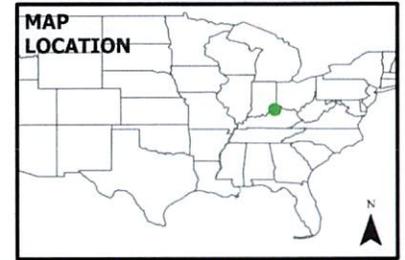
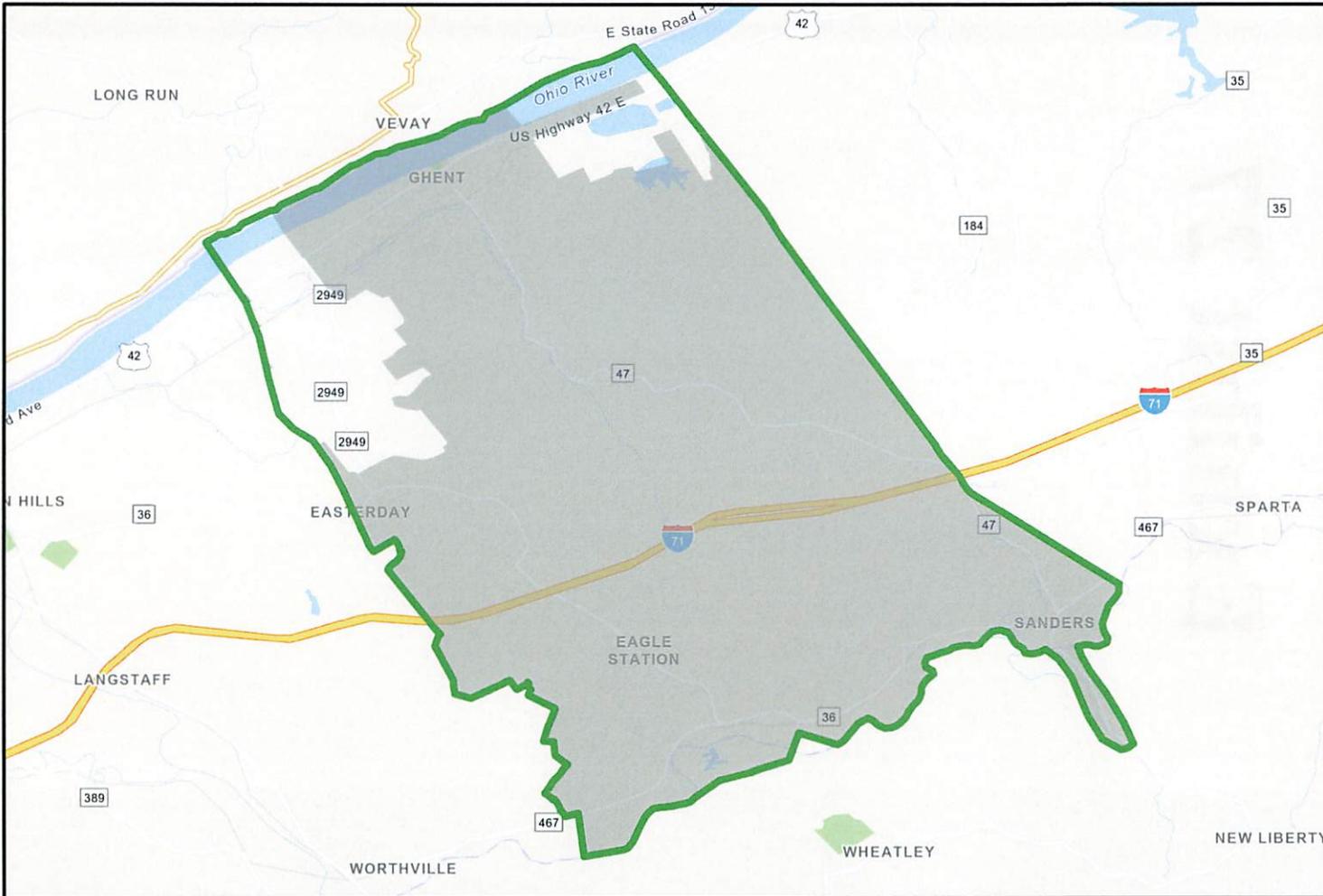


# **Exhibit 27**

# GHENT WIRE CENTER, KY (GHNTKYMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	34	54



Center: 85°1'3"W 38°41'12"N

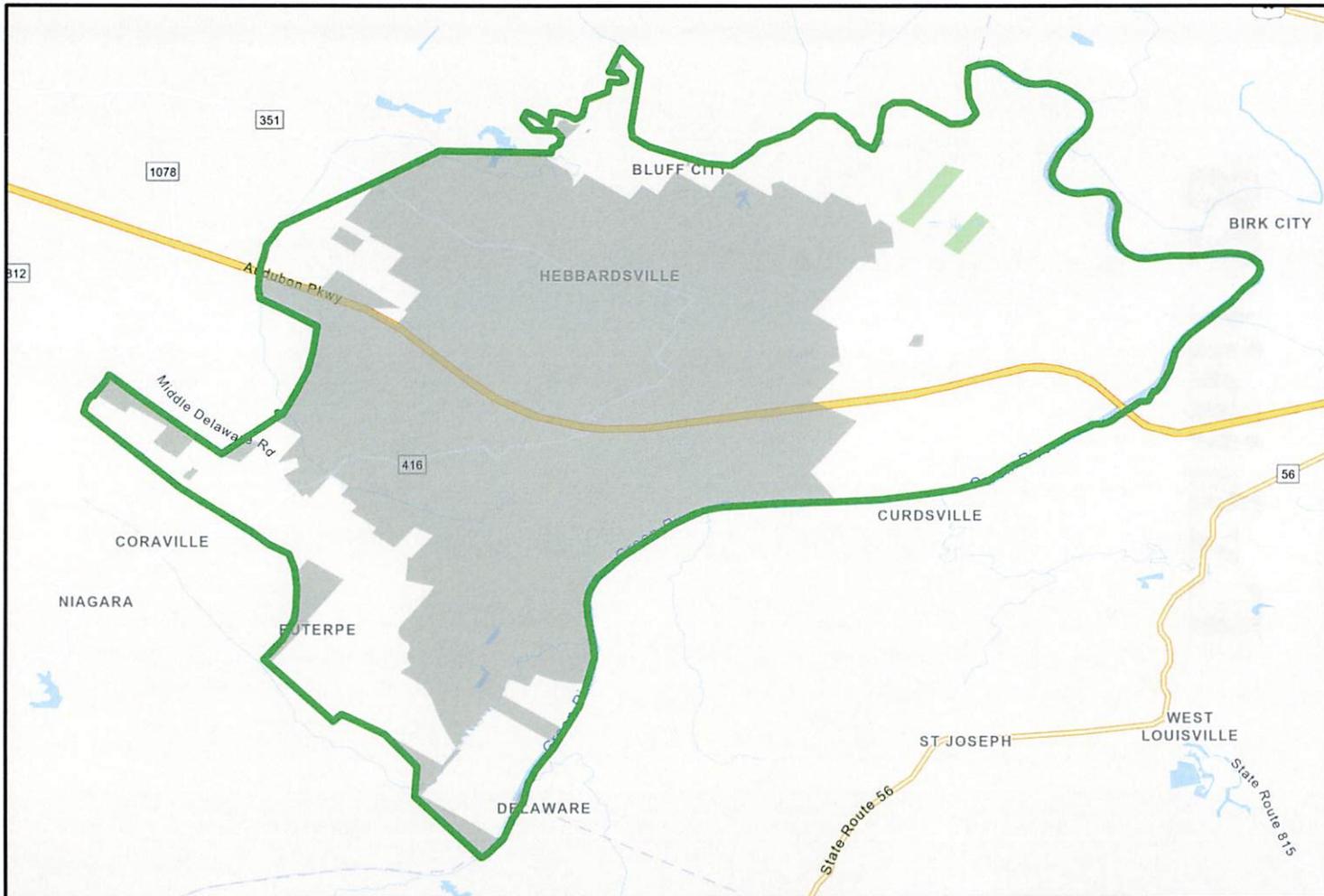


# **Exhibit 28**

# HEBBARDSVILLE WIRE CENTER, KY (HBVLKYMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	31	3



Center: 87°22'48"W 37°44'52"N

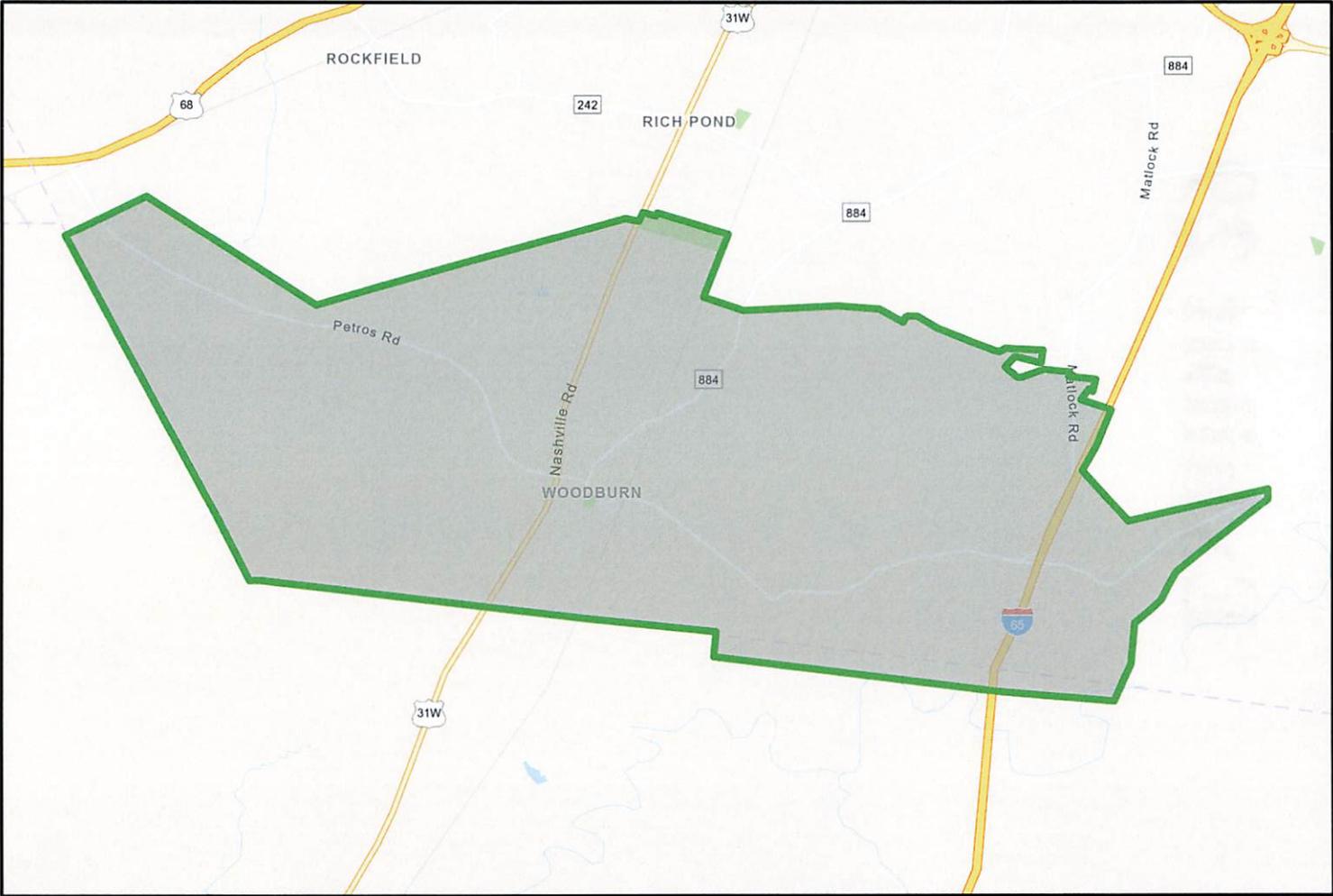


# **Exhibit 29**

# WOODBURN WIRE CENTER, KY (WDBNKYMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	26	3



Center: 86°31'18"W 36°50'59"N

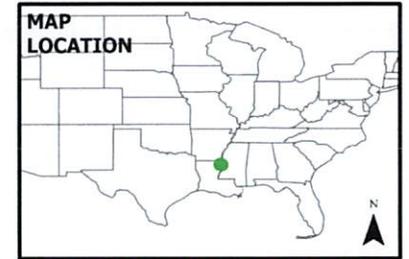
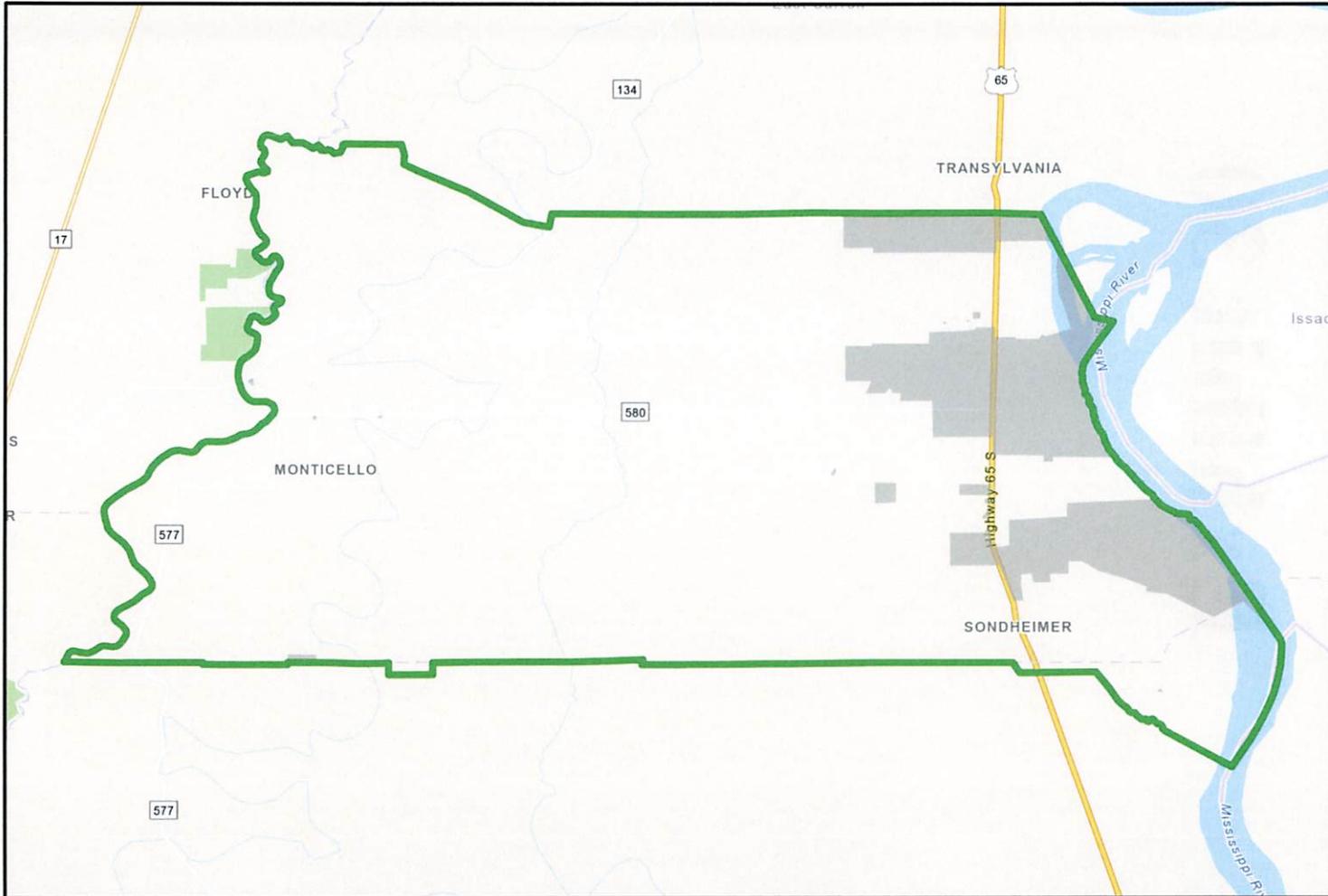


# **Exhibit 30**

# ALSATIA WIRE CENTER, LA (LKPRLAAL)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	18	6



Center: 91°16'39"W 32°36'1"N

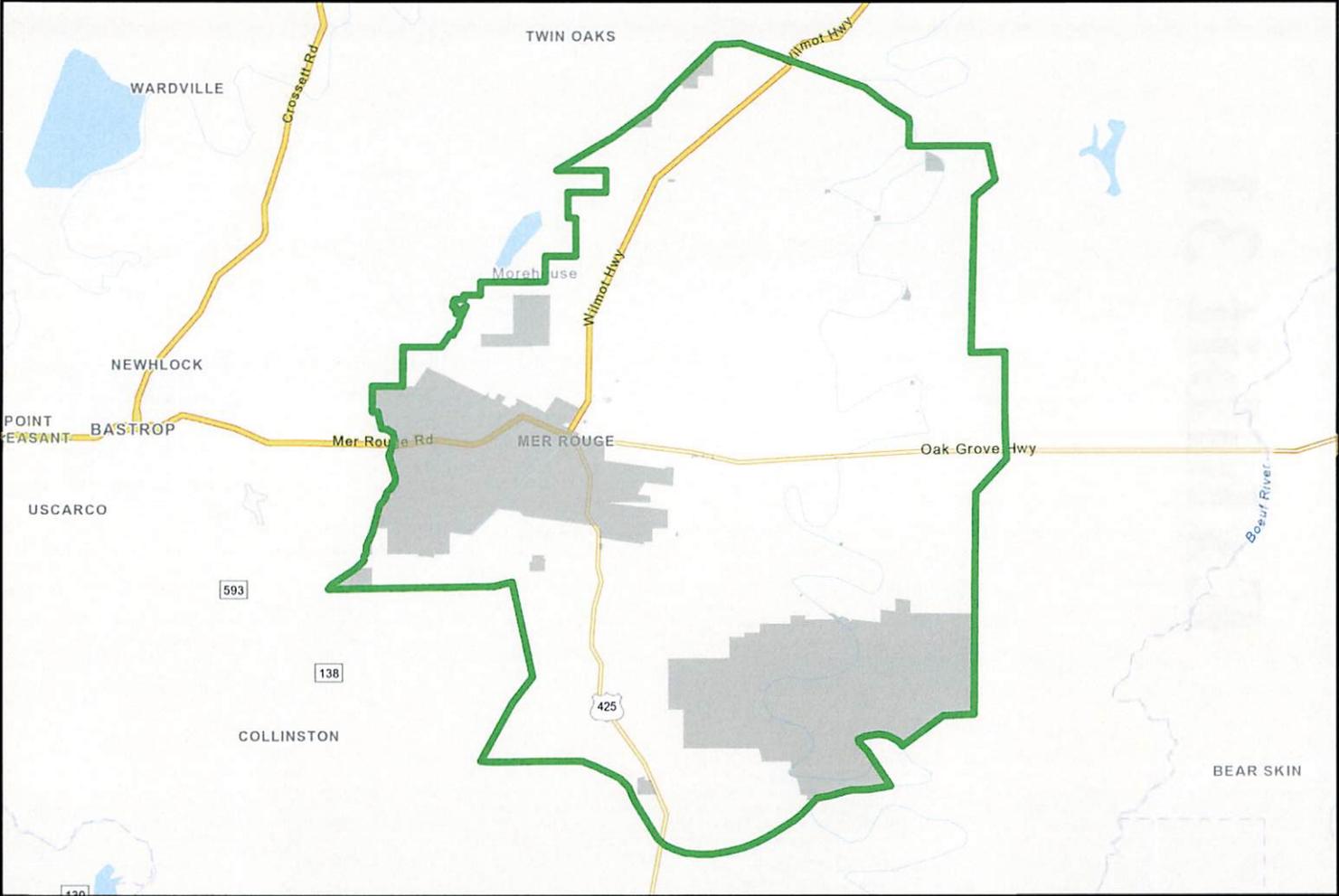


# **Exhibit 31**

# MER ROUGE WIRE CENTER, LA (MRRGLAMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	24	13



Center: 91°45'52"W 32°46'18"N



# **Exhibit 32**

# BELLEVILLE NE WIRE CENTER, MI (BLVLMINE)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	0	11



Center: 83°27'1"W 42°14'31"N

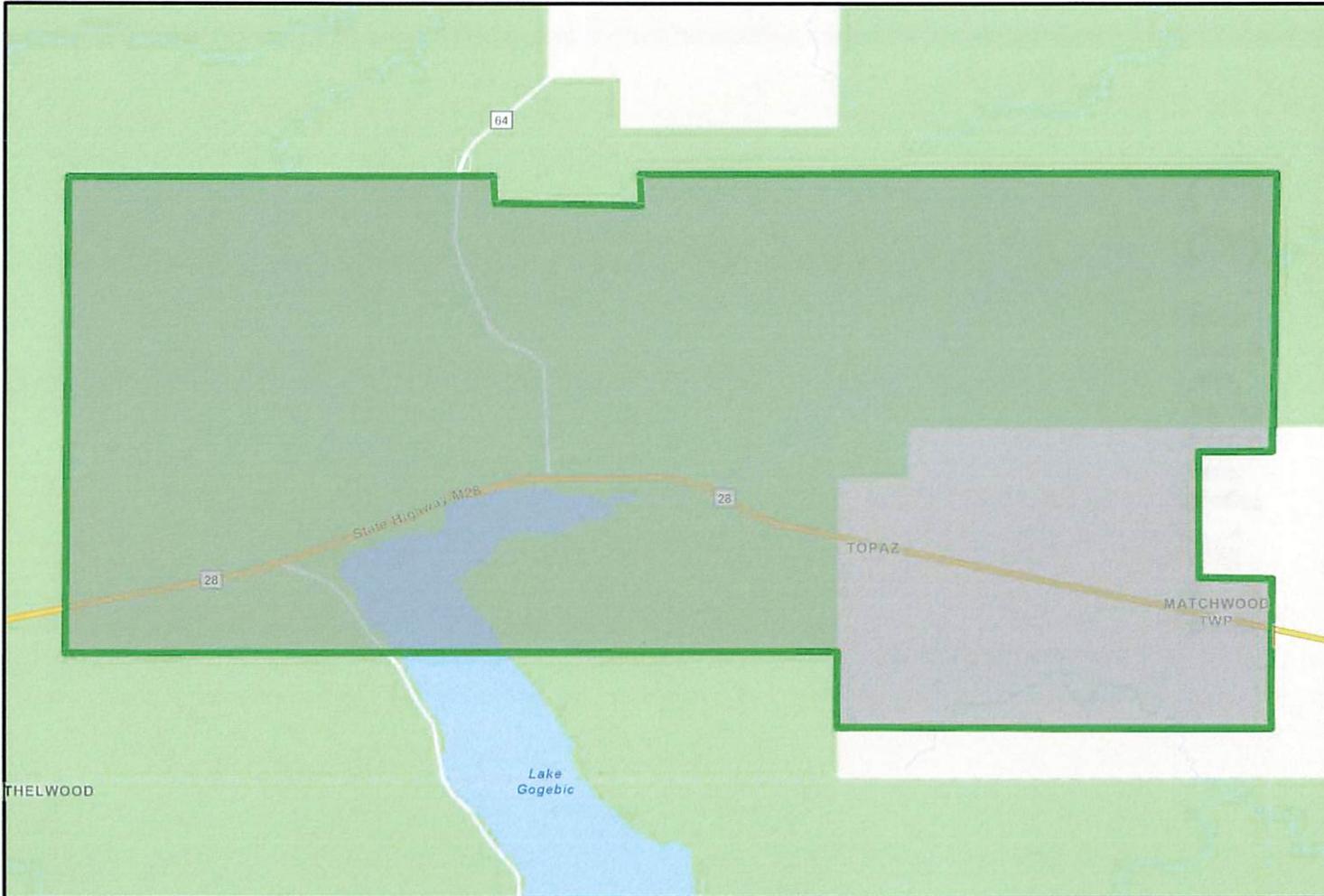


# **Exhibit 33**

# BERGLAND WIRE CENTER, MI (BRLDMIMN)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	22	7



Center: 89°32'18"W 46°36'1"N

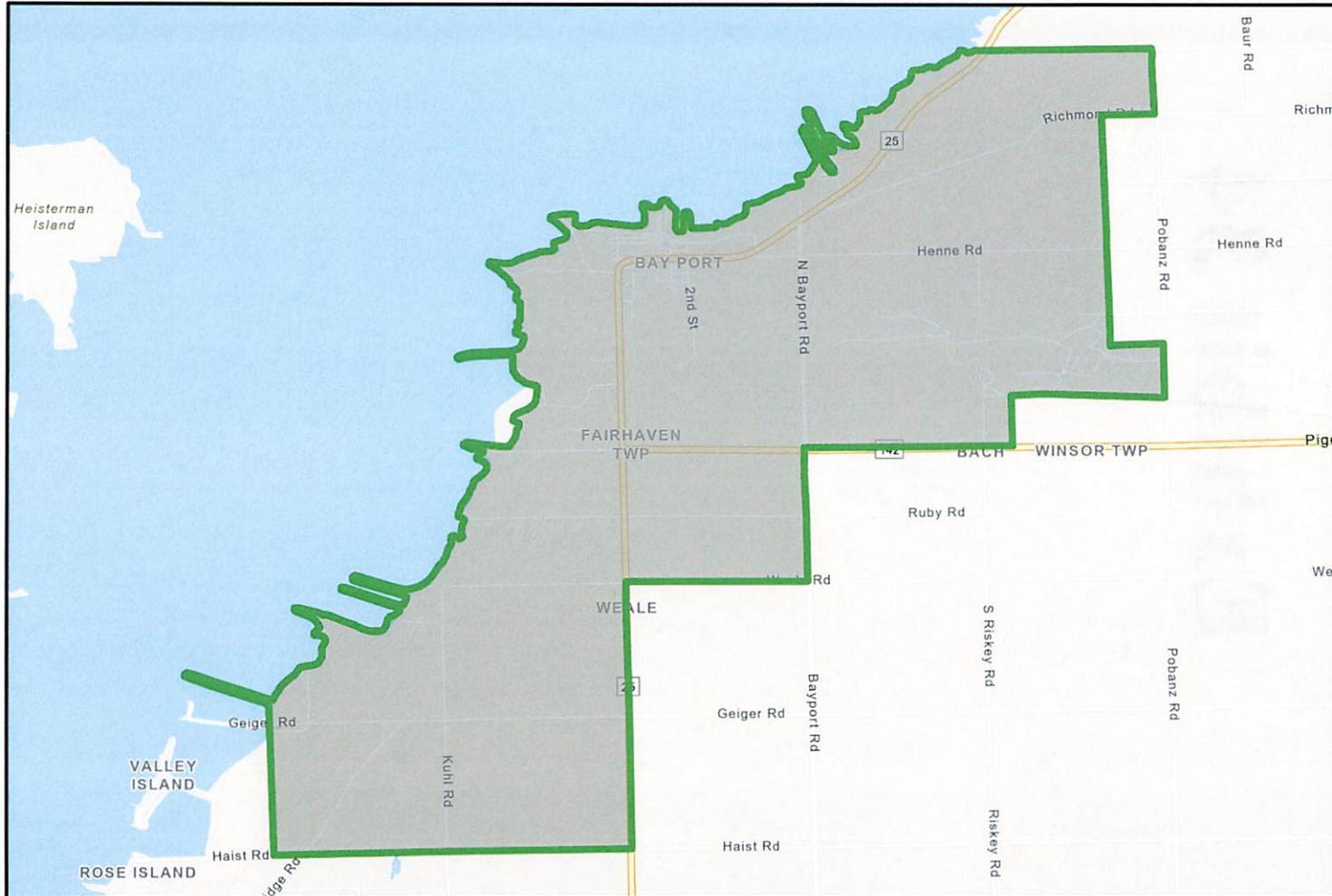


# **Exhibit 34**

# BAY PORT WIRE CENTER, MI (BYPTMIMN)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	22	2



Center: 83°22'22"W 43°49'41"N

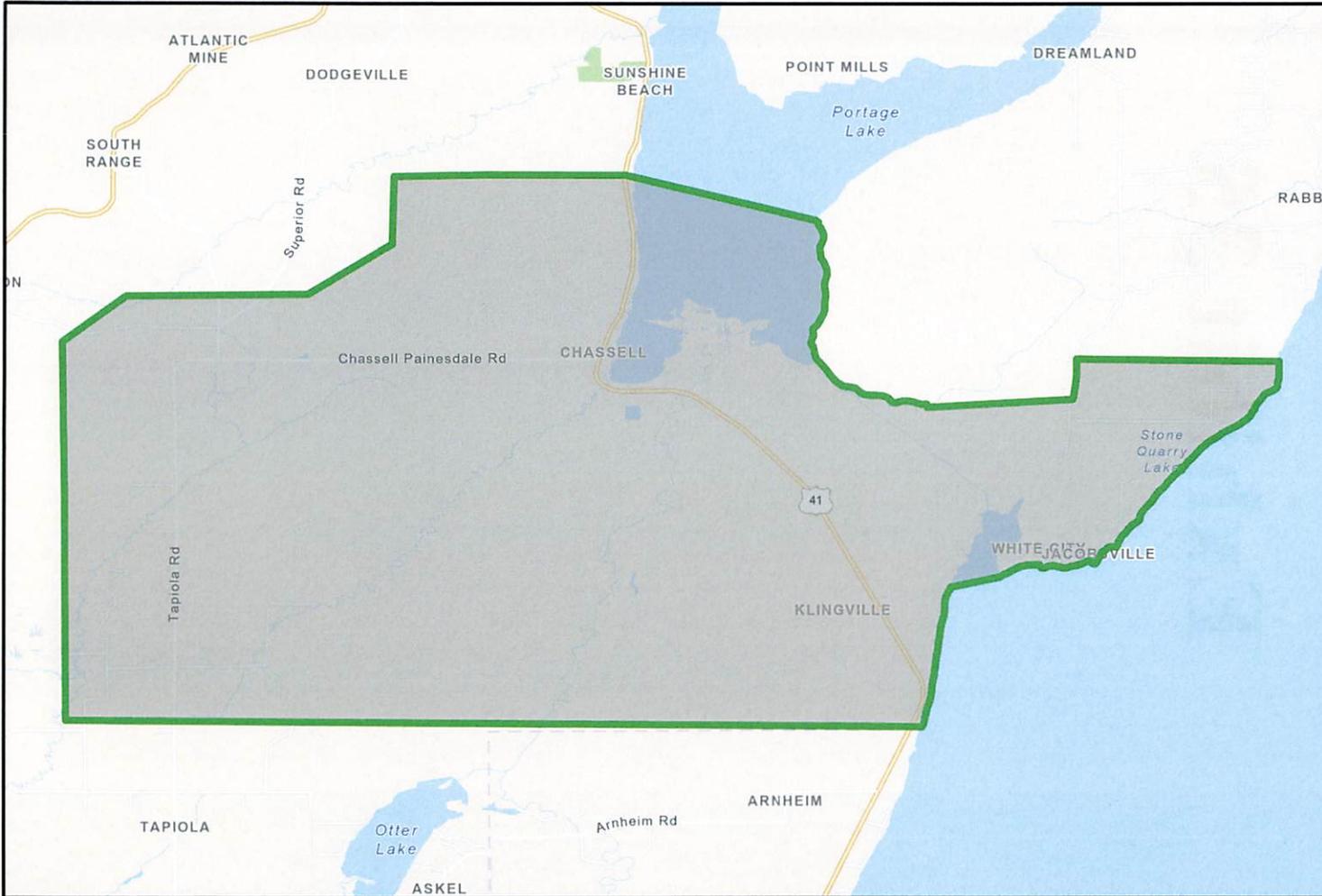


# **Exhibit 35**

# CHASSEL WIRE CENTER, MI (CHSLMIMN)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	35	3



Center: 88°30'36"W 47°0'15"N

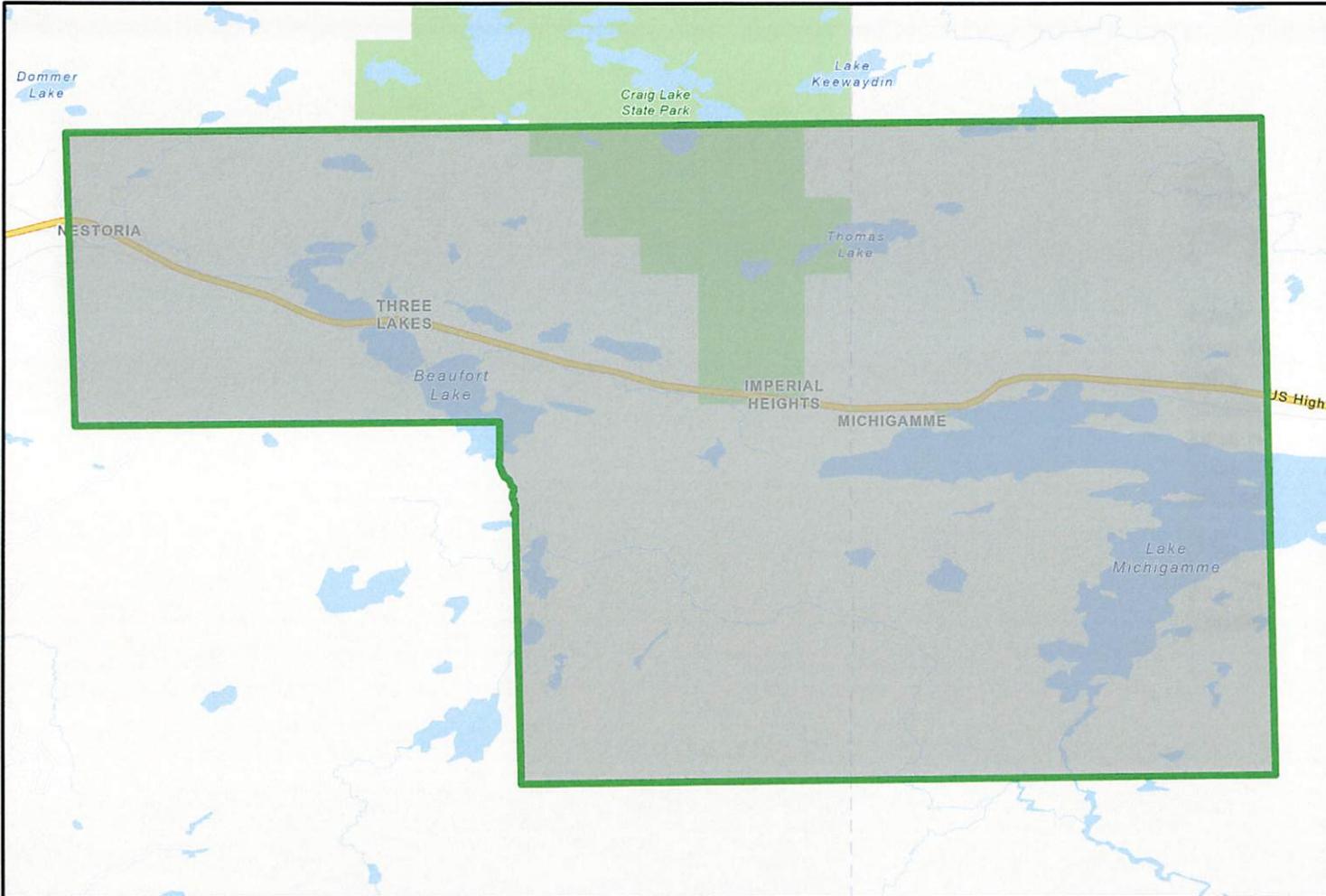


# **Exhibit 36**

# MICHIGAMME WIRE CENTER, MI (MCHGMIMN)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	44	14



Center: 88°9'4"W 46°31'45"N



# **Exhibit 37**

# POWERS WIRE CENTER, MI (PWRSMIMN)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	55	24



Center: 87°32'59"W 45°43'20"N

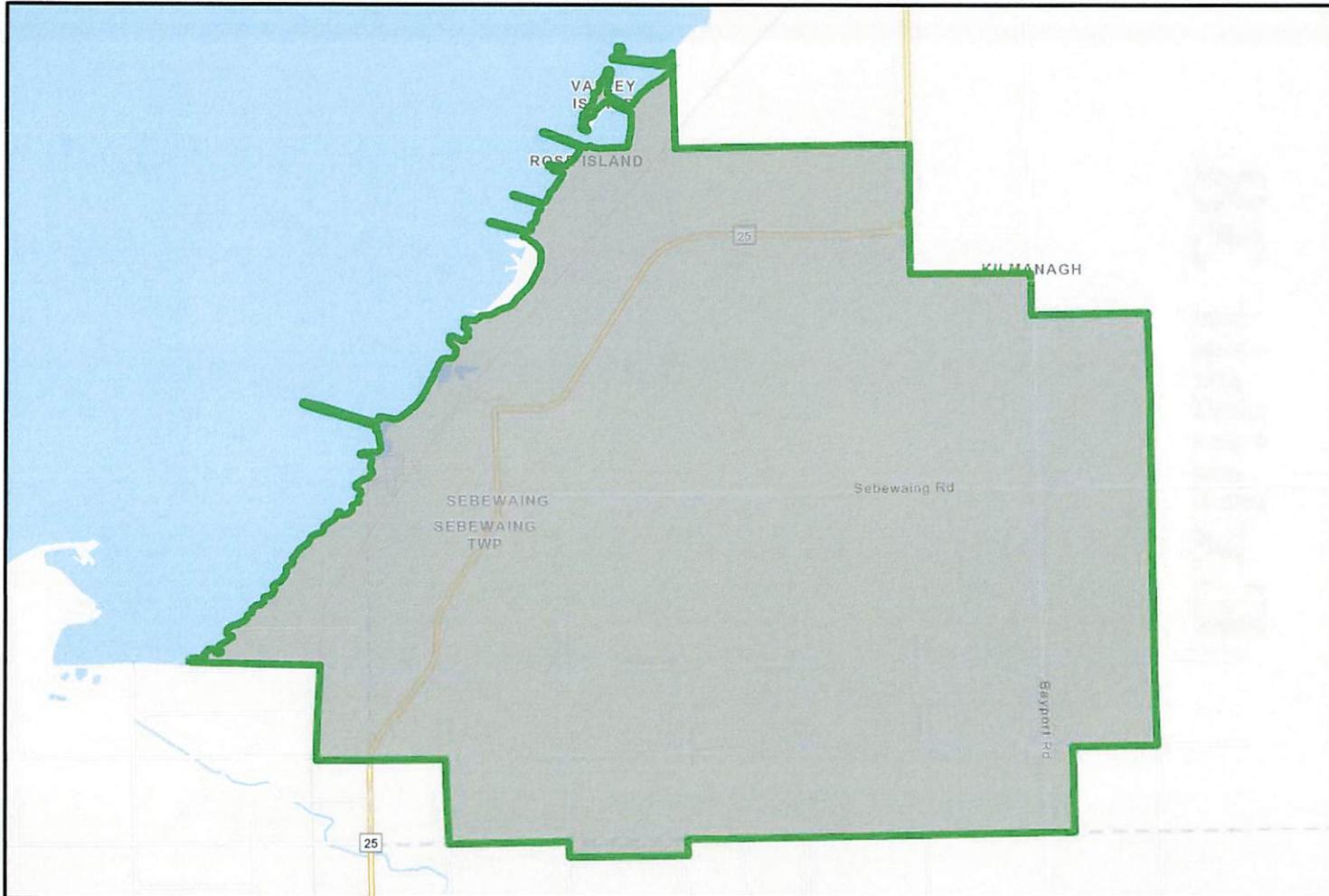


# **Exhibit 38**

# SEBEWAING WIRE CENTER, MI (SBWNMISB)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	83	13



Center: 83°25'W 43°44'N

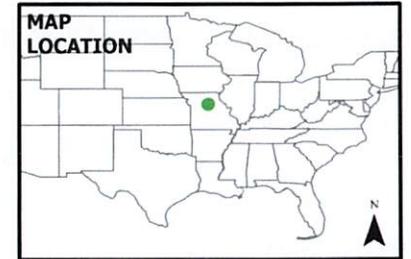
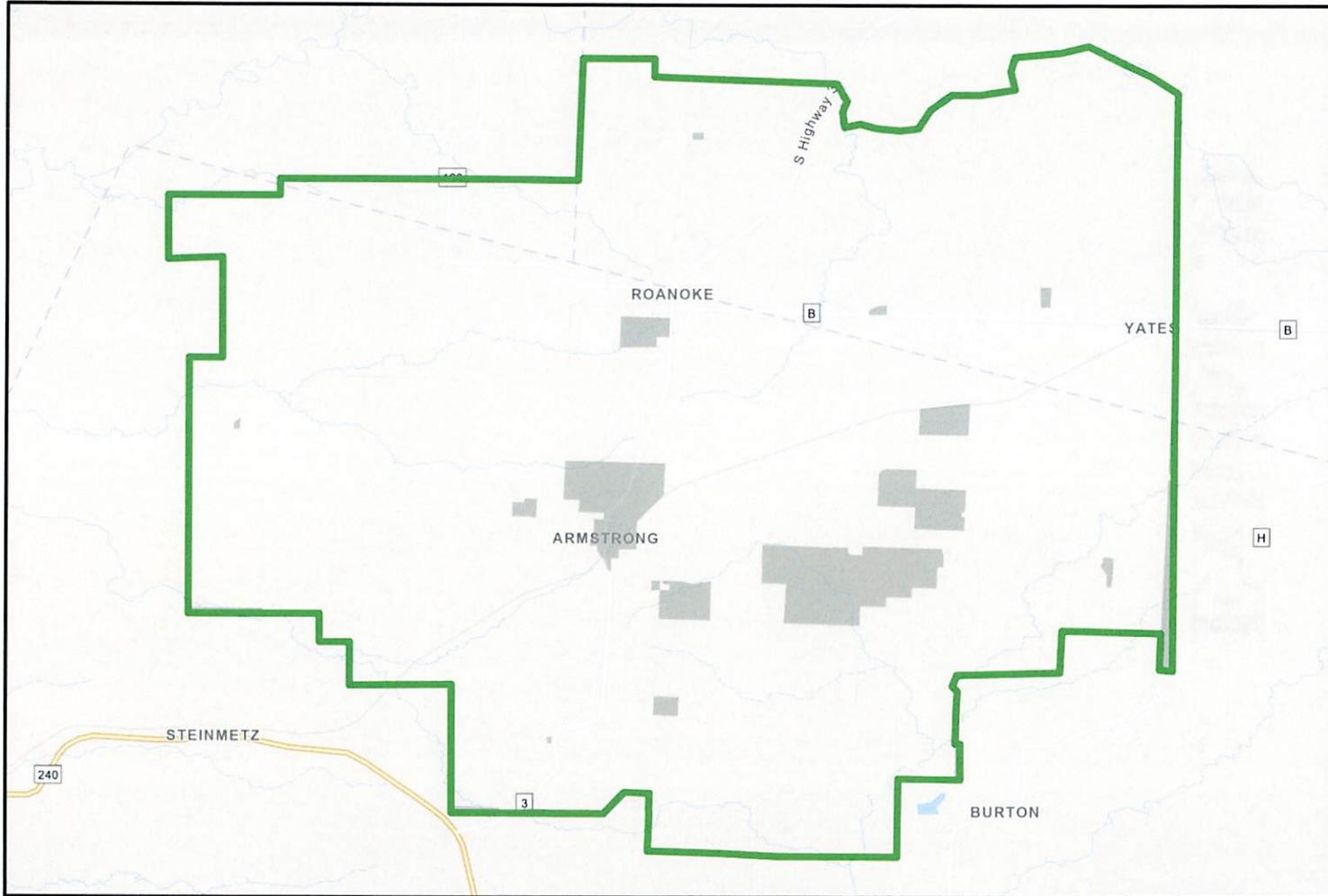


# **Exhibit 39**

# ARMSTRONG WIRE CENTER, MO (ARMSMOCR)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	24	0



Center: 92°41'19"W 39°17'11"N

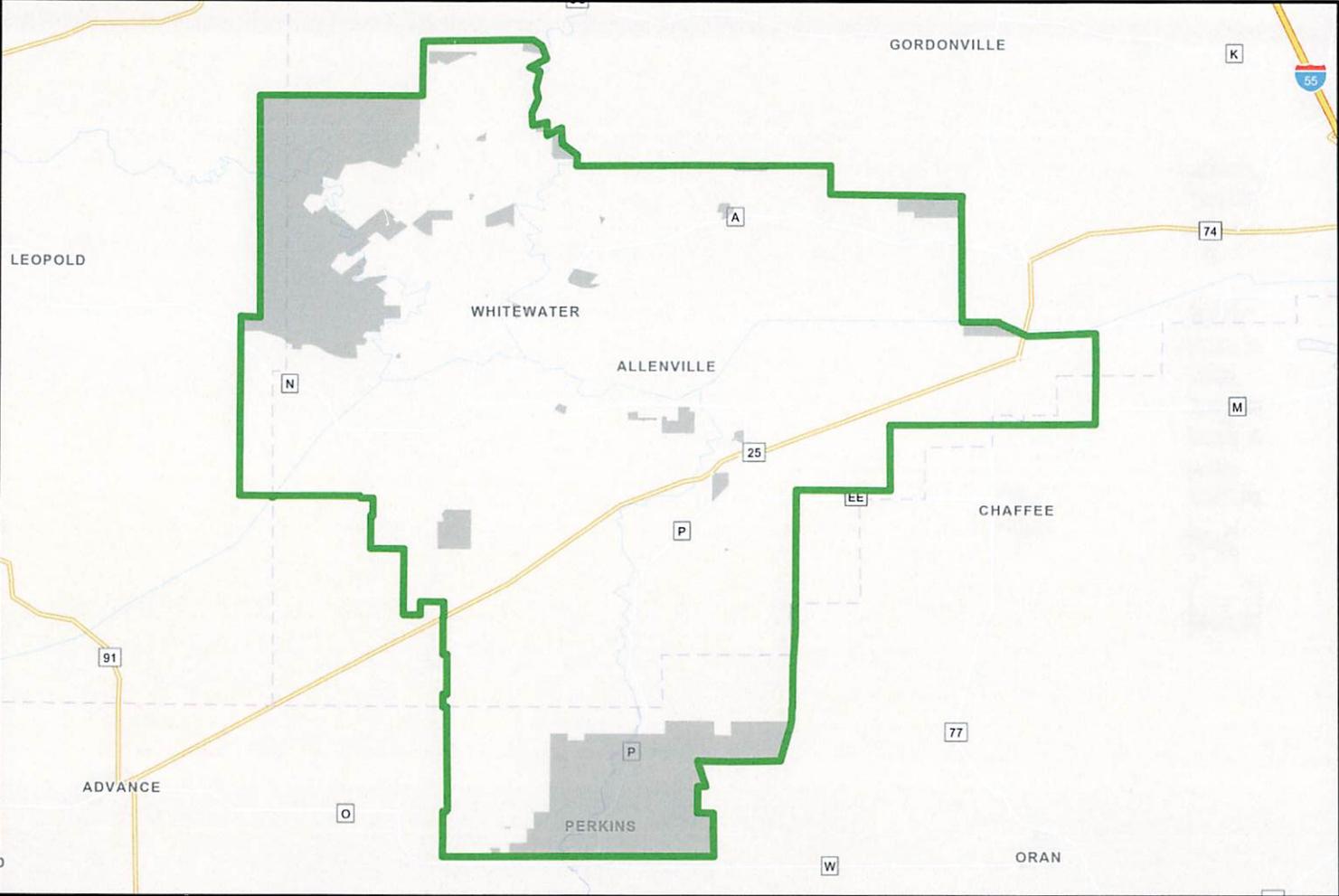


# **Exhibit 40**

# DELTA WIRE CENTER, MO (DELTMO SW)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	29	10



Center: 89°45'27"W 37°11'52"N

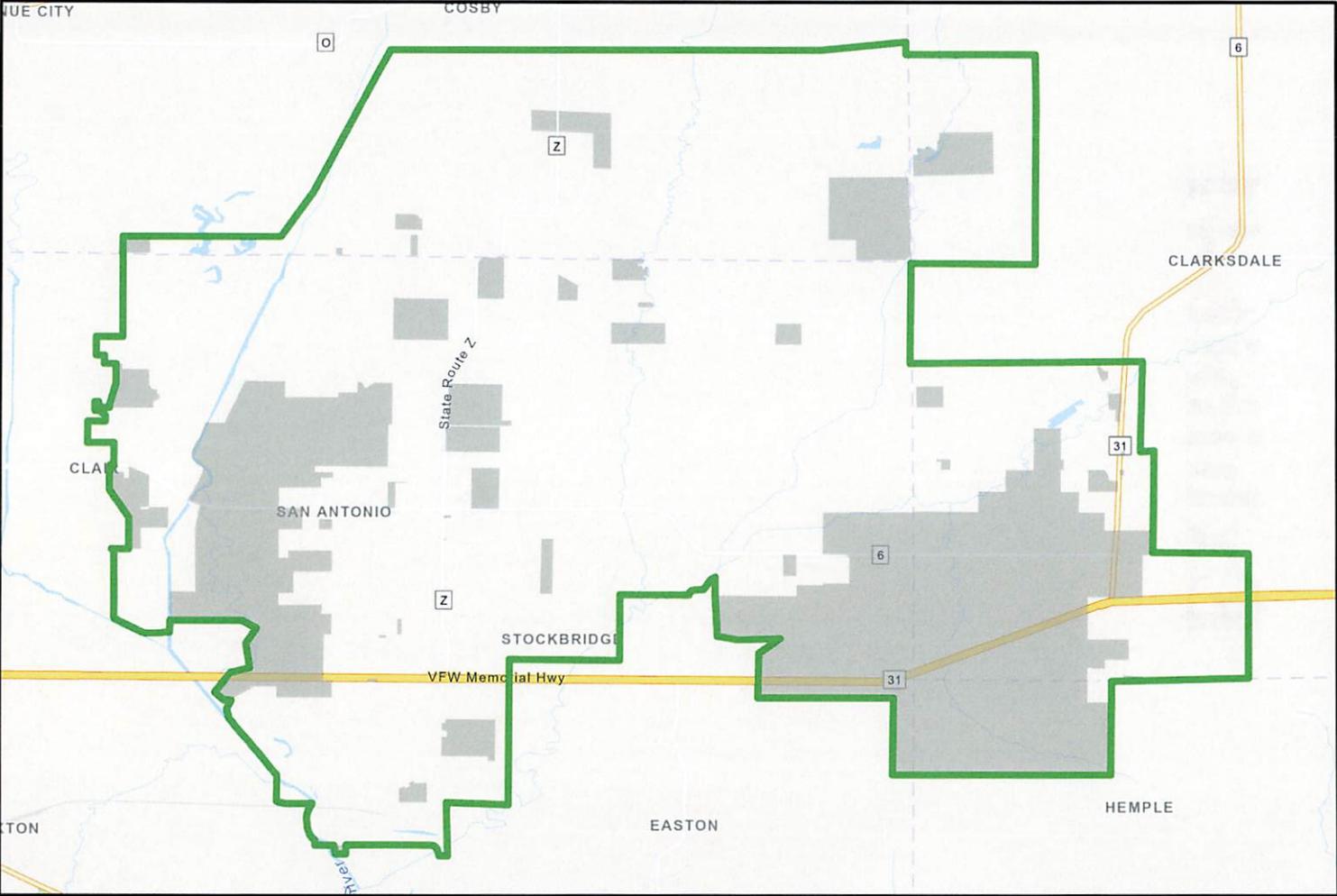


# **Exhibit 41**

# SAN ANTONIO WIRE CENTER, MO (SNANMOMO)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	38	5



Center: 94°38'41"W 39°47'14"N

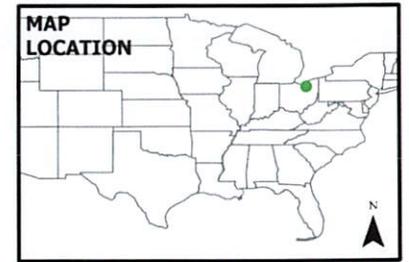


# **Exhibit 42**

# BROOK PARK AEROSPACE WIRE CENTER, OH (BKPKOH97)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	0	2



Center: 81°52'28"W 41°24'14"N

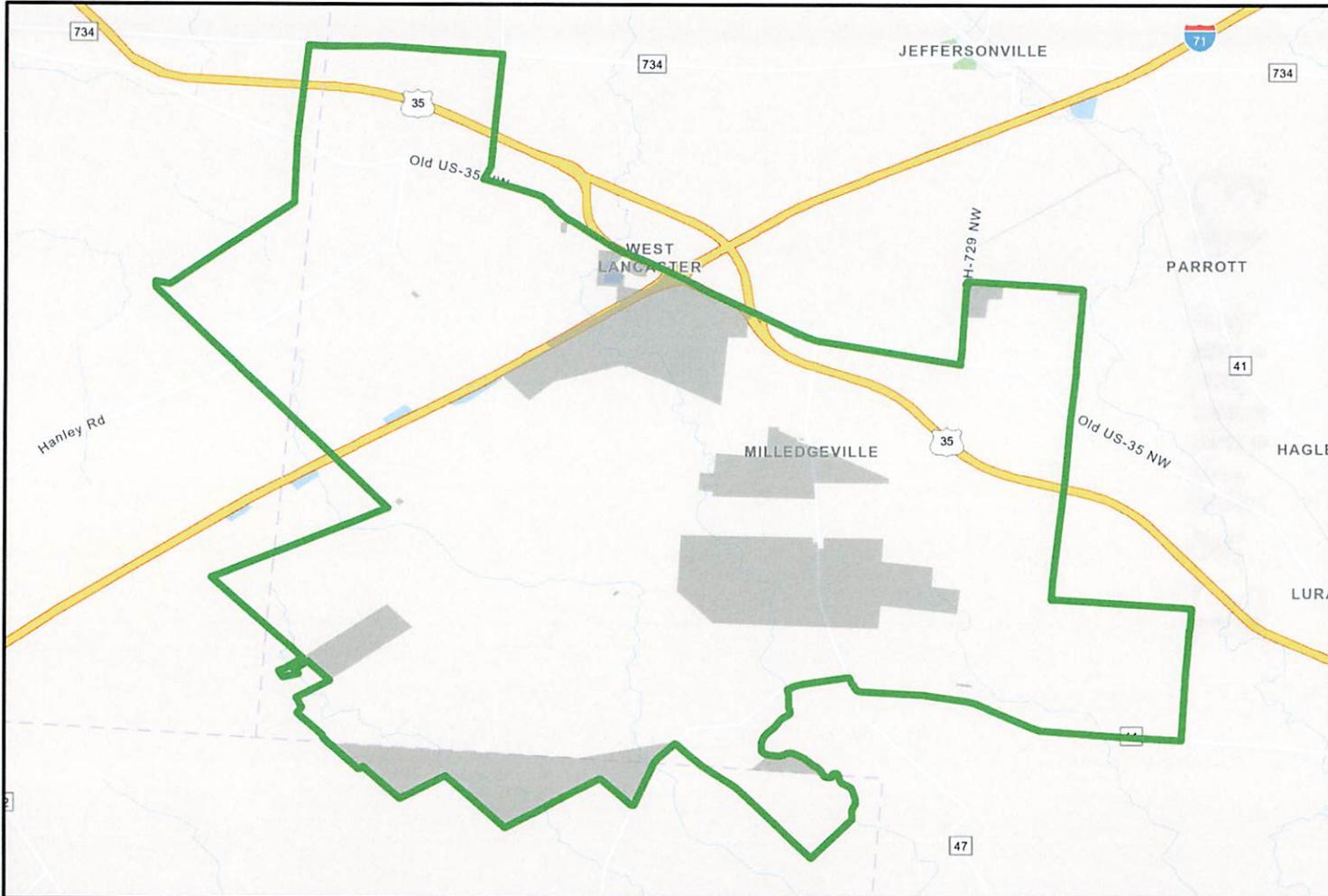


# **Exhibit 43**

# MILLEDGEVILLE WIRE CENTER, OH (MDVLOH94)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	23	7



Center: 83°36'29"W 39°35'35"N

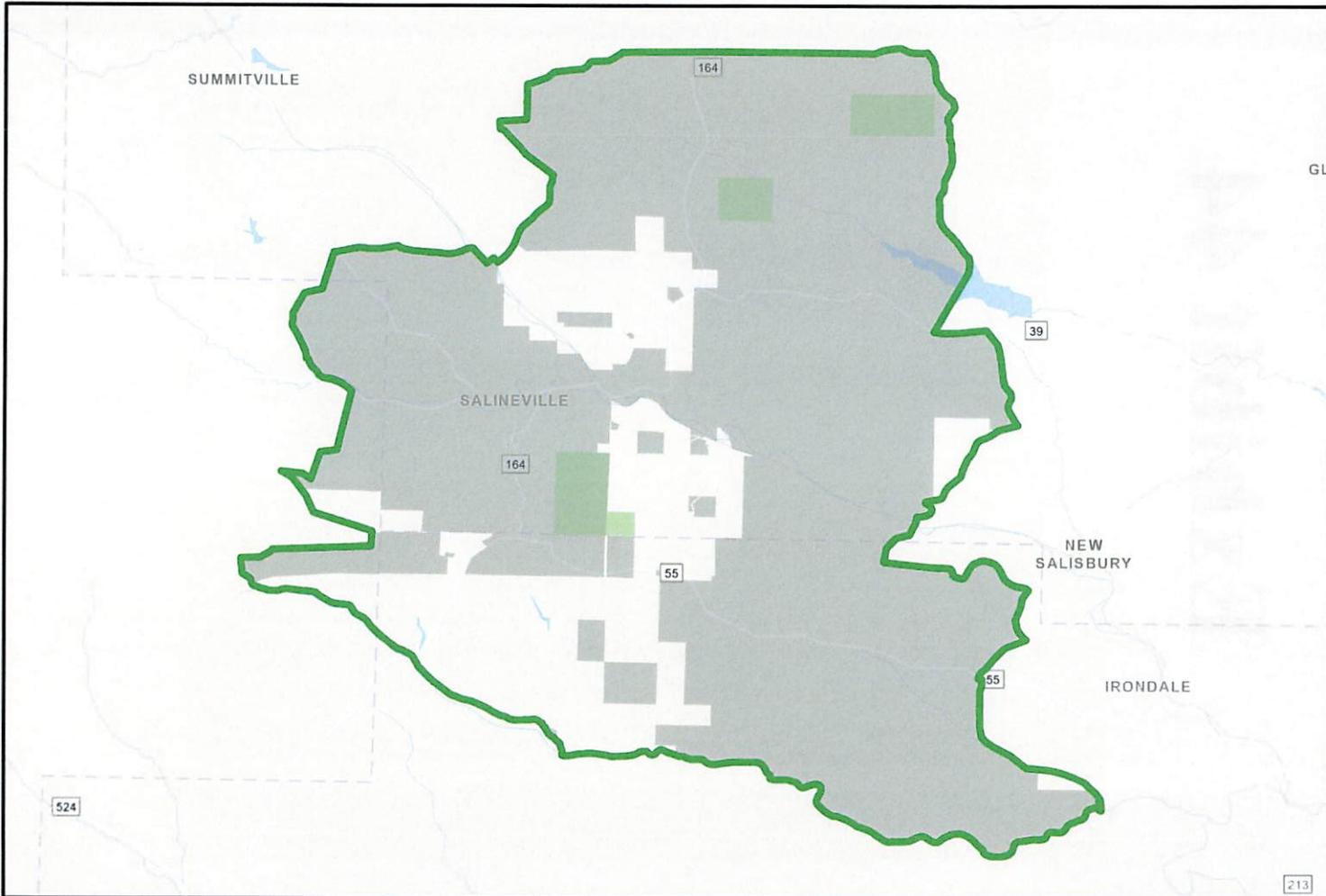


# **Exhibit 44**

# SALINEVILLE WIRE CENTER, OH (SAVLOH67)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	102	26



Center: 80°48'42"W 40°36'47"N

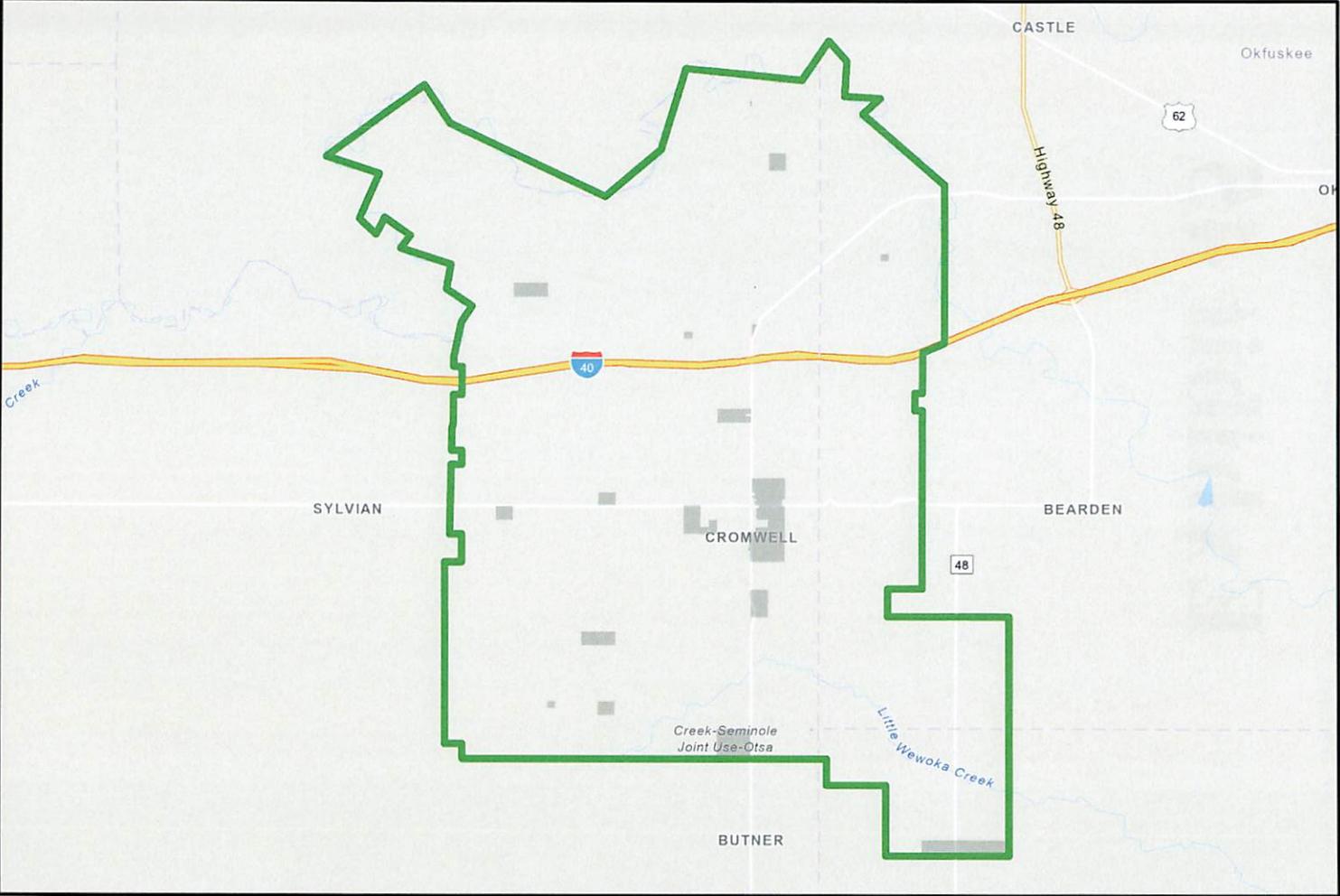


# **Exhibit 45**

# CROMWELL WIRE CENTER, OK (CRWLOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	11	3



Center: 96°28'51"W 35°21'47"N

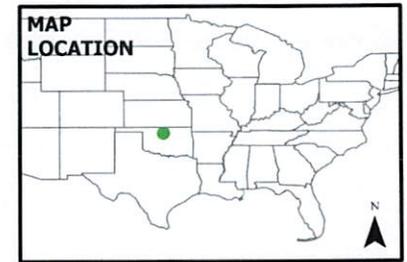
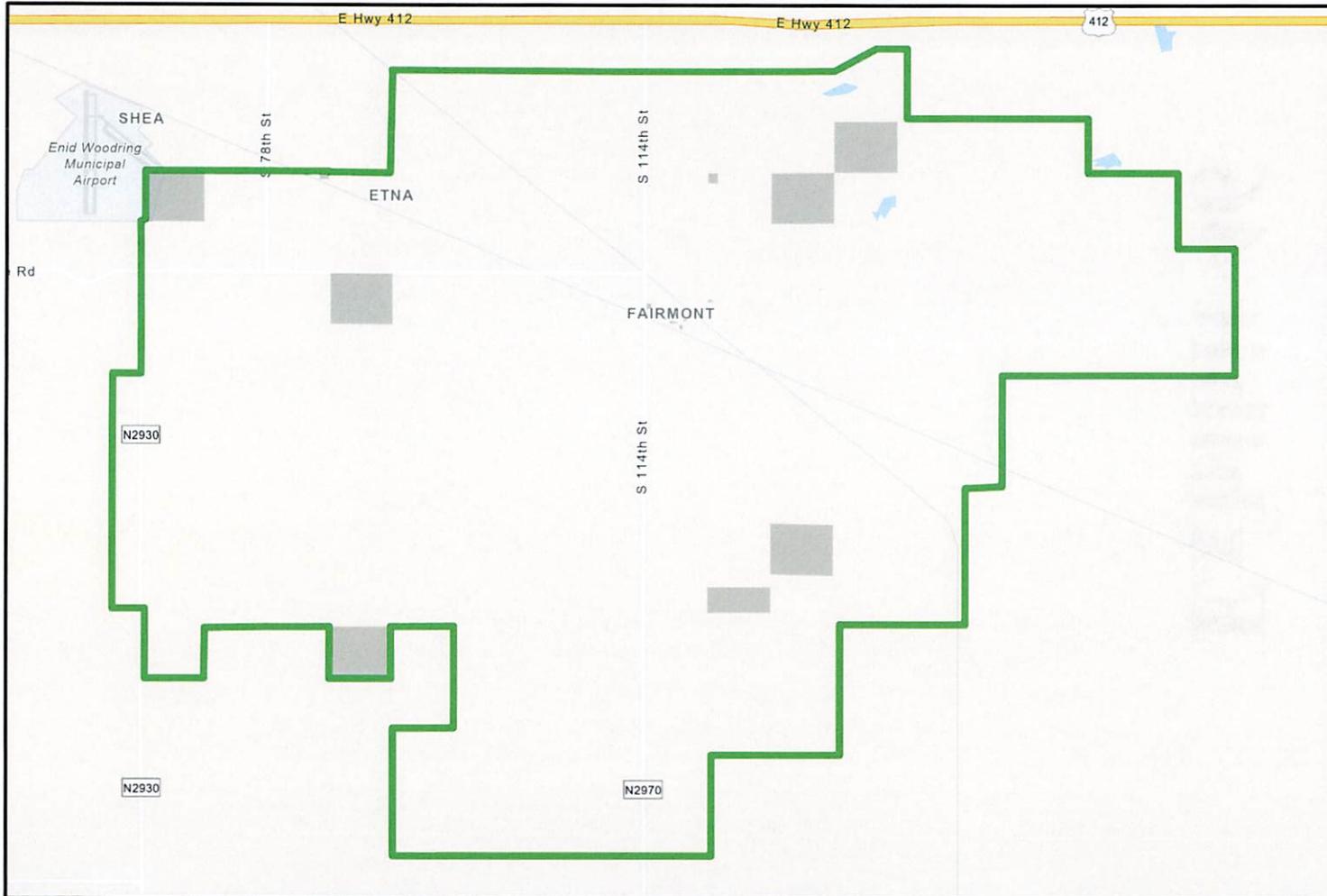


# **Exhibit 46**

# FAIRMONT WIRE CENTER, OK (FAMTOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	10	4



Center: 97°42'26"W 36°20'9"N

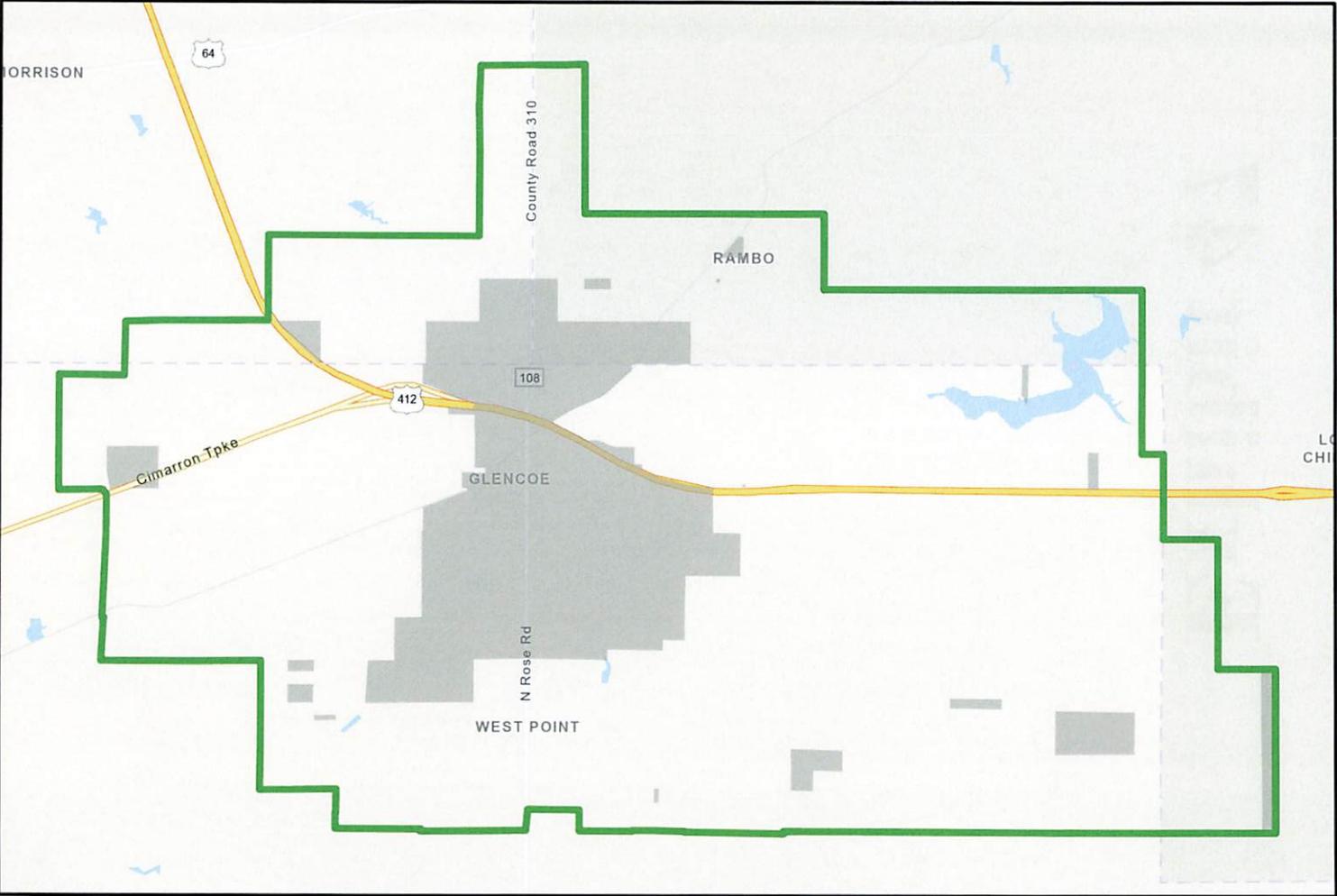


# **Exhibit 47**

# GLENCOE WIRE CENTER, OK (GLCOOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	32	21



Center: 96°54'9"W 36°13'56"N

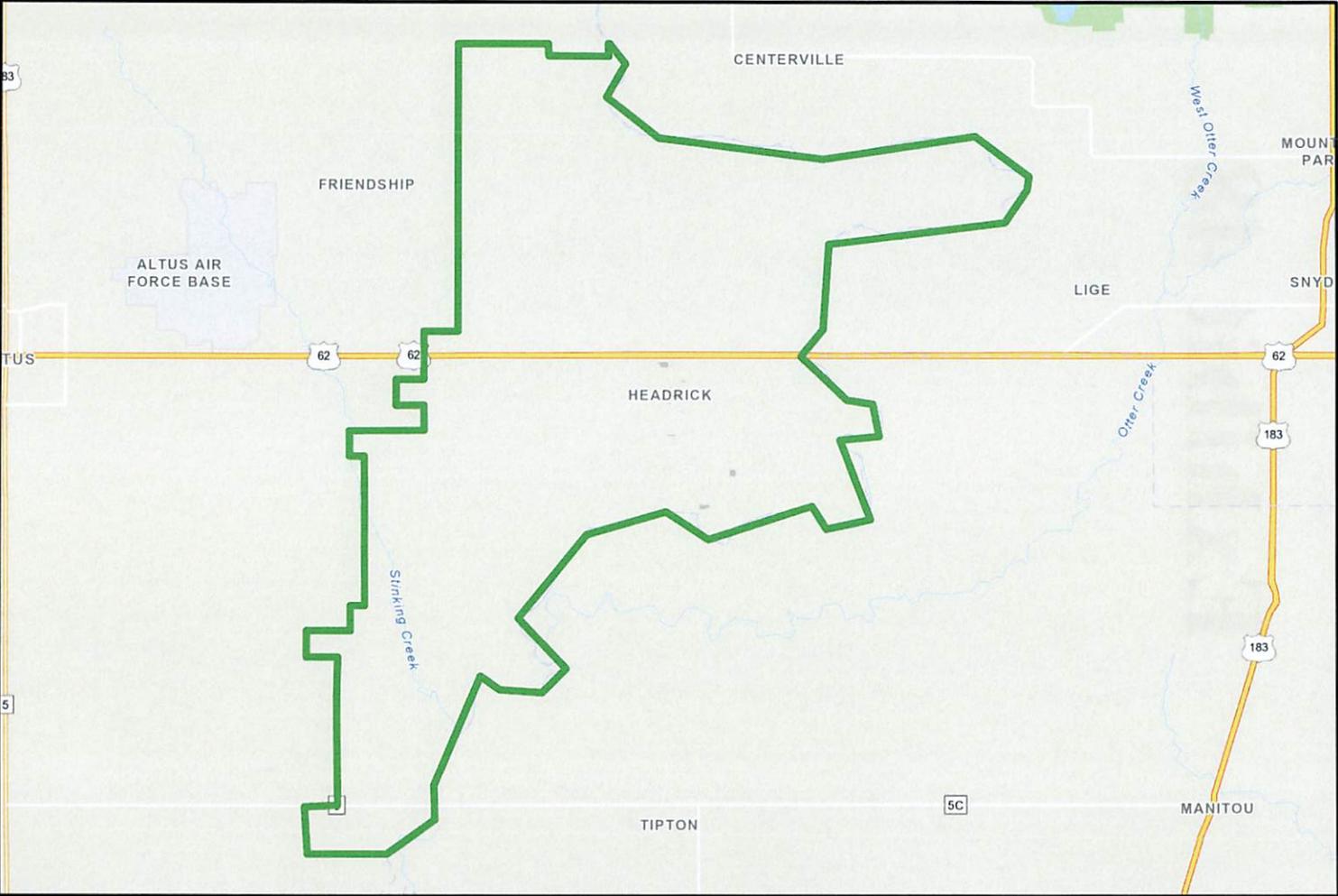


# **Exhibit 48**

# HEADRICK WIRE CENTER, OK (HDRCOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	3	4



Center: 99°8'30"W 34°36'39"N

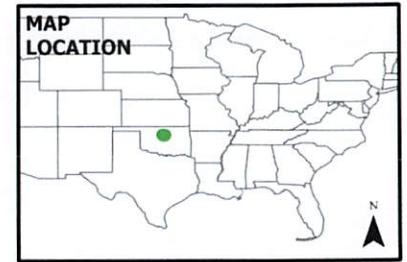
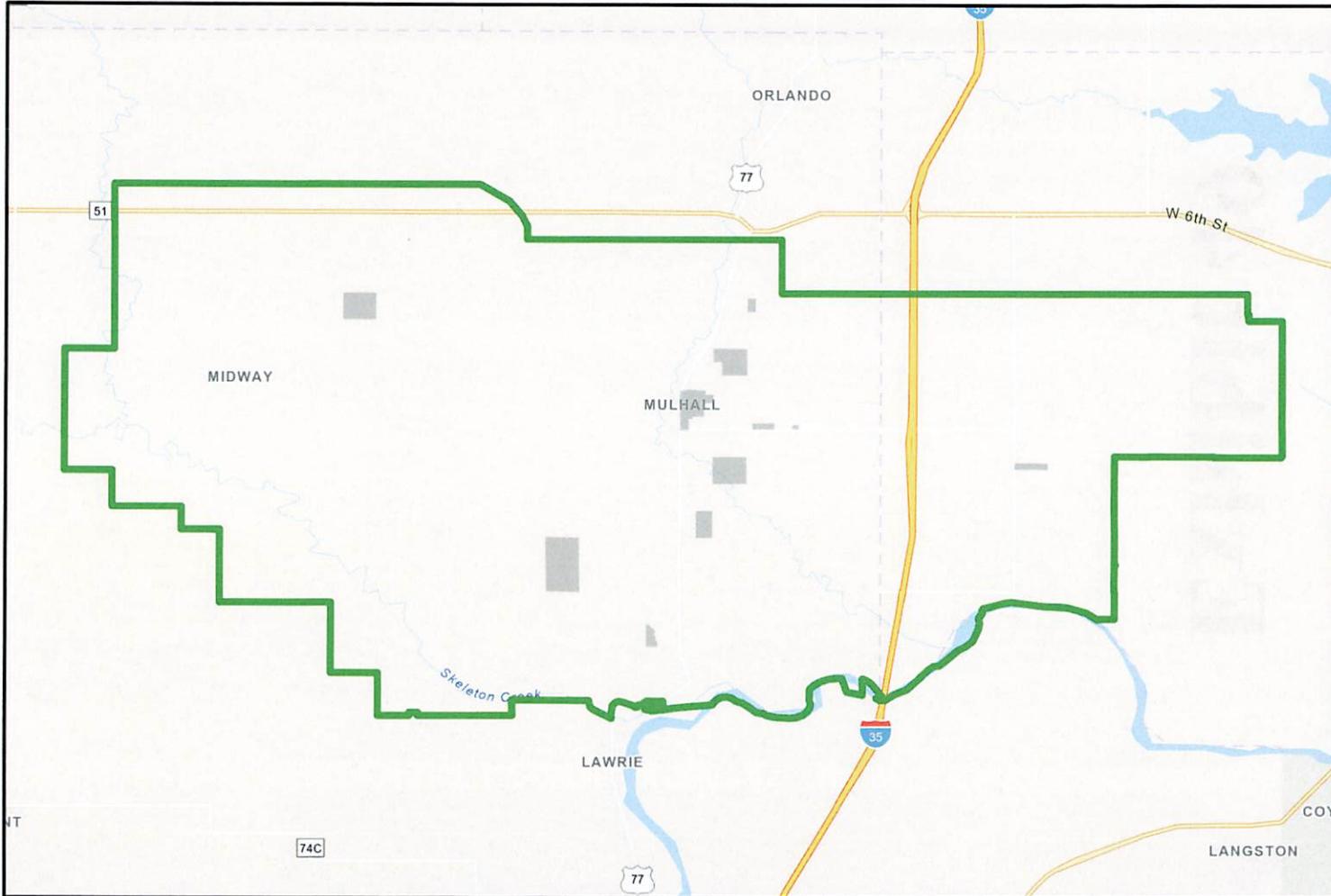


# **Exhibit 49**

# MULHALL WIRE CENTER, OK (MLHLOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	13	1



Center: 97°24'35"W 36°3'7"N

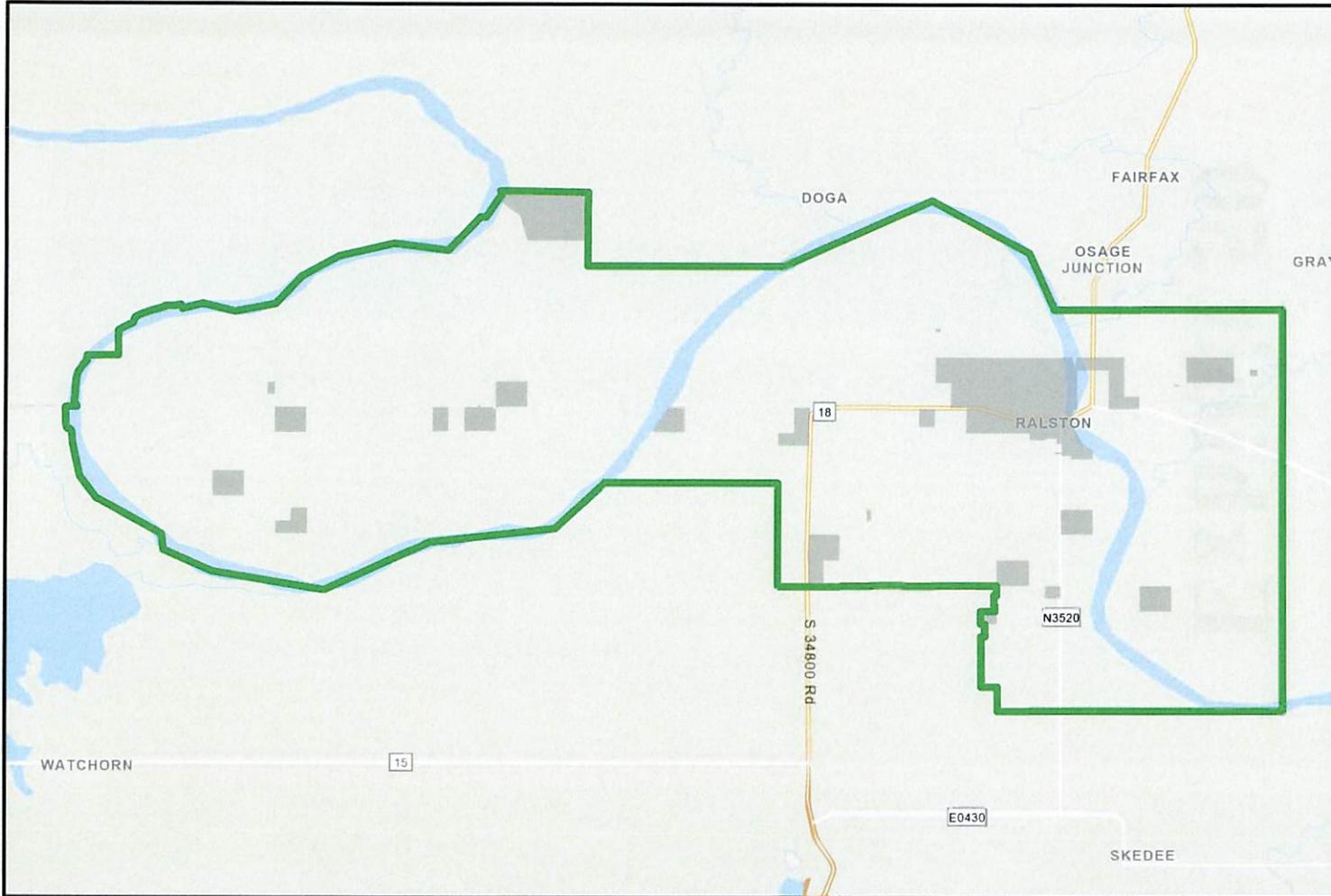


# **Exhibit 50**

# RALSTON WIRE CENTER, OK (RLTNOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	44	5



Center: 96°50'19"W 36°29'41"N

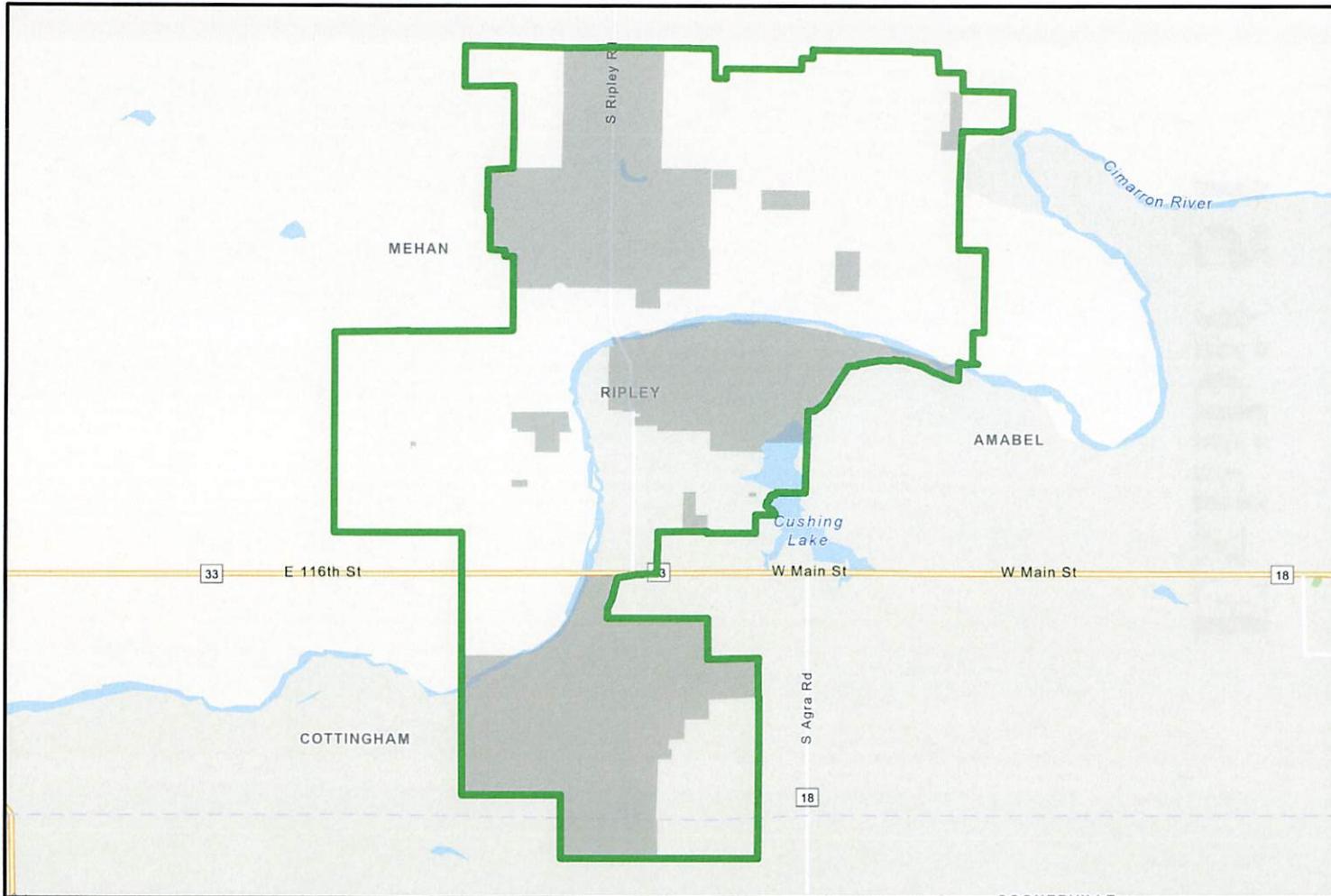


# **Exhibit 51**

# RIPLEY WIRE CENTER, OK (RPLYOKMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	31	22



Center: 96°53'53"W 36°0'27"N

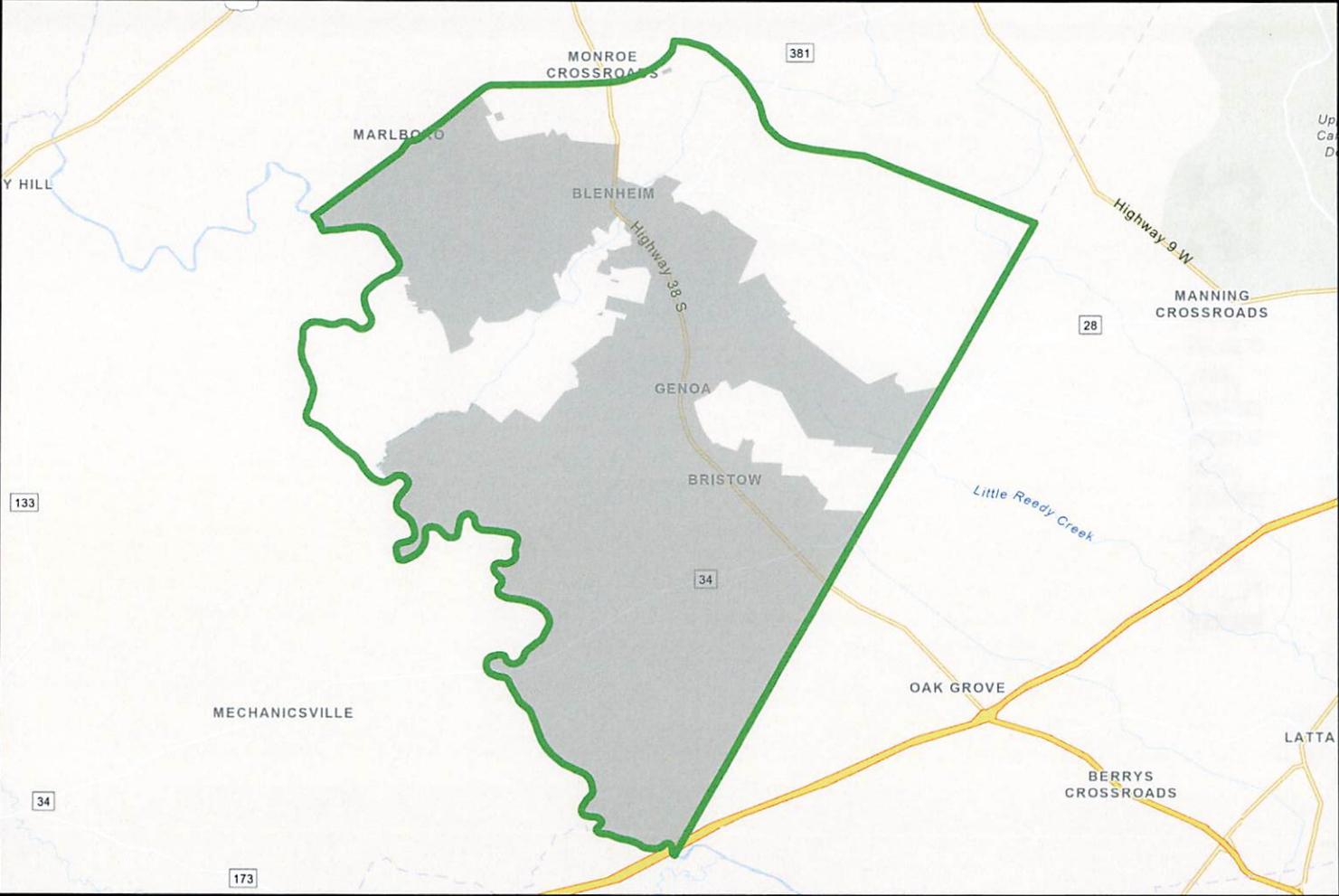


# **Exhibit 52**

# BLENHEIM WIRE CENTER, SC (BLNHSCMA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	52	14



Center: 79°38'10"W 34°25'41"N

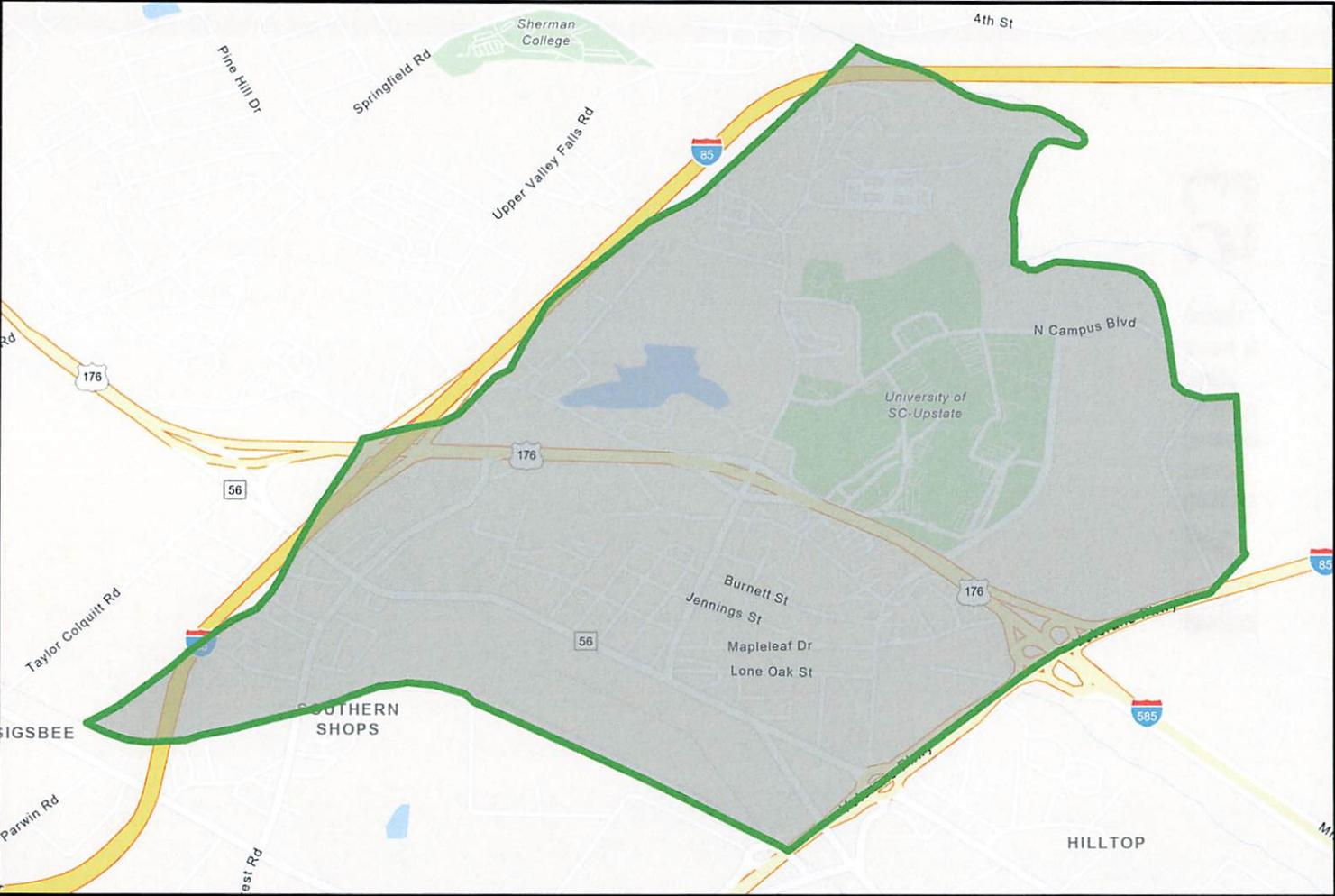


# **Exhibit 53**

# UNIVERSITY WAY WIRE CENTER, SC (SPBGSCHW)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	5	62



Center: 81°58'53"W 34°59'51"N

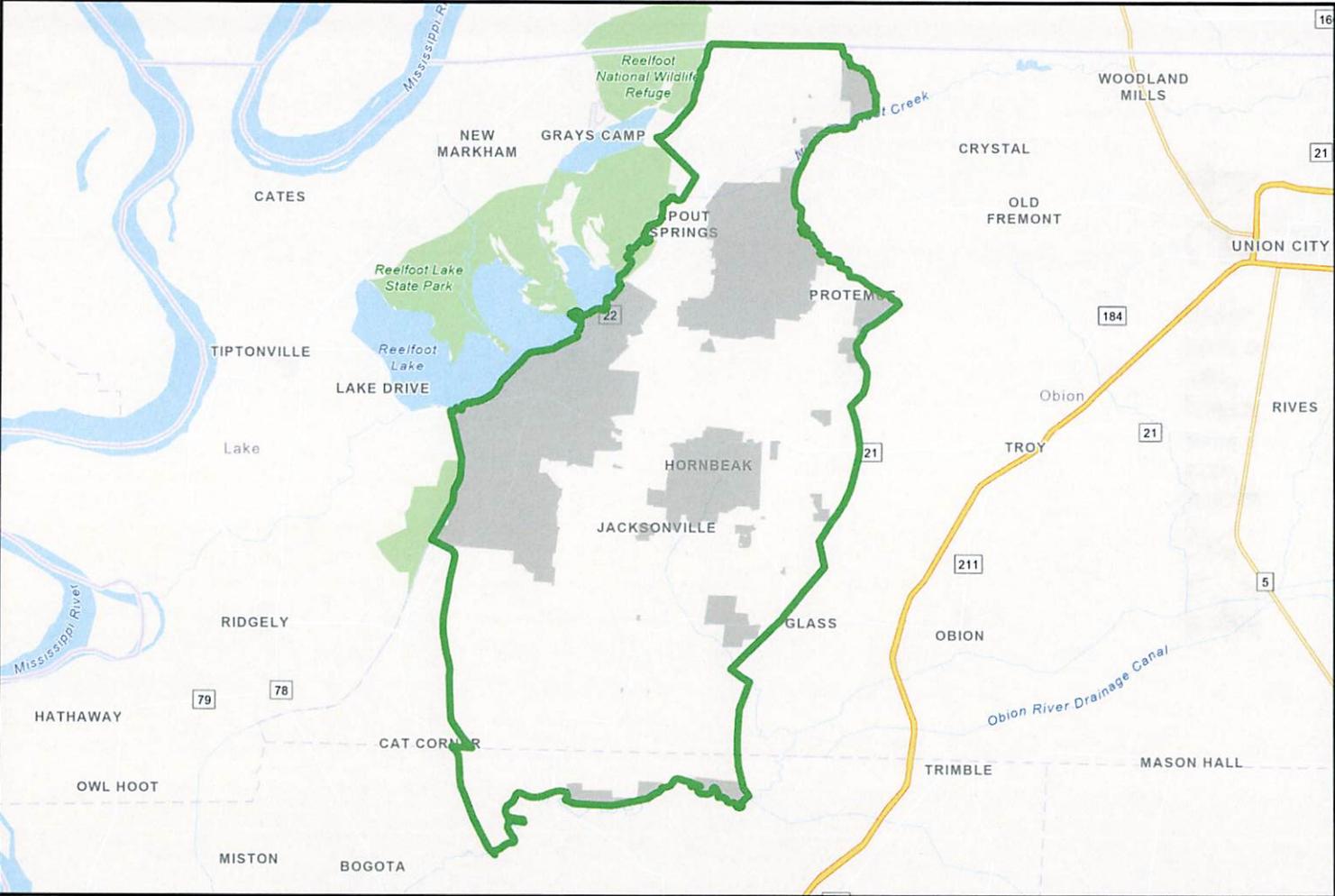


# **Exhibit 54**

# HORNBEAK WIRE CENTER, TN (HRNBTNMT)

As of 25 OCT 2023

<b>Service</b>	<b>AT&amp;T Residential Local Service</b>	<b>AT&amp;T Business Local Exchange Access Line Service</b>
Number of Lines	53	8



Center: 89°18'54"W 36°20'10"N



# **Exhibit 55**

# AIRPORT AUTHORITY WIRE CENTER, TN (NSVLTNAA)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	0	45



Center: 86°40'8"W 36°7'50"N



# **Exhibit 56**

# COCKRILL BEND WIRE CENTER, TN (NSVLTNCD)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	1	105



Center: 86°52'51"W 36°11'4"N

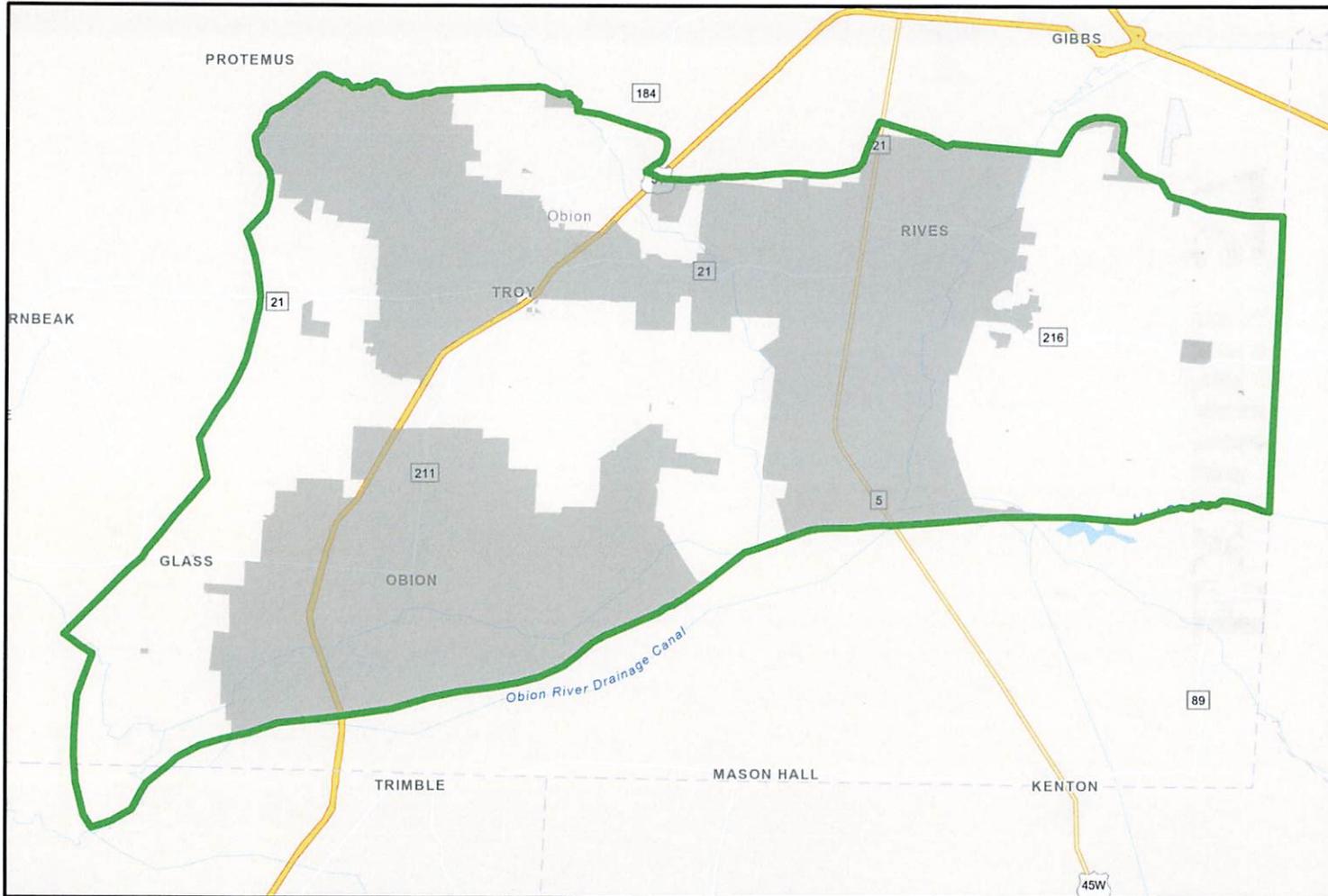


# **Exhibit 57**

# TROY WIRE CENTER, TN (TROYTNMT)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	47	24



Center: 89°7'12"W 36°17'39"N

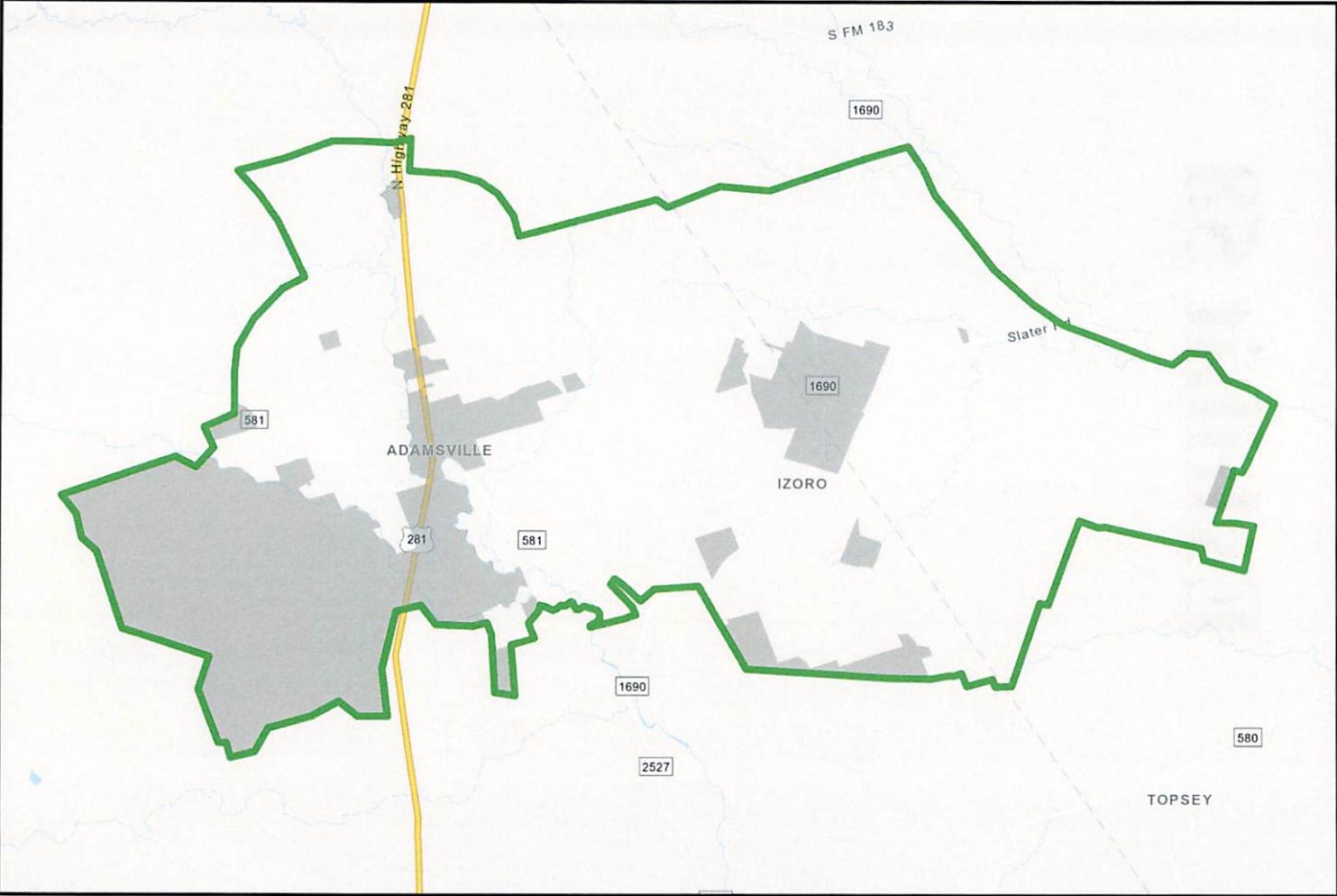


# **Exhibit 58**

# ADAMSVILLE WIRE CENTER, TX (ADVLTXAV)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	14	0



Center: 98°6'38"W 31°18'5"N



# **Exhibit 59**

# BAYSIDE WIRE CENTER, TX (BYSDTXBY)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	2	4



Center: 97°12'40"W 28°7'20"N

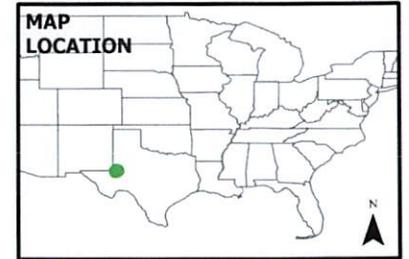
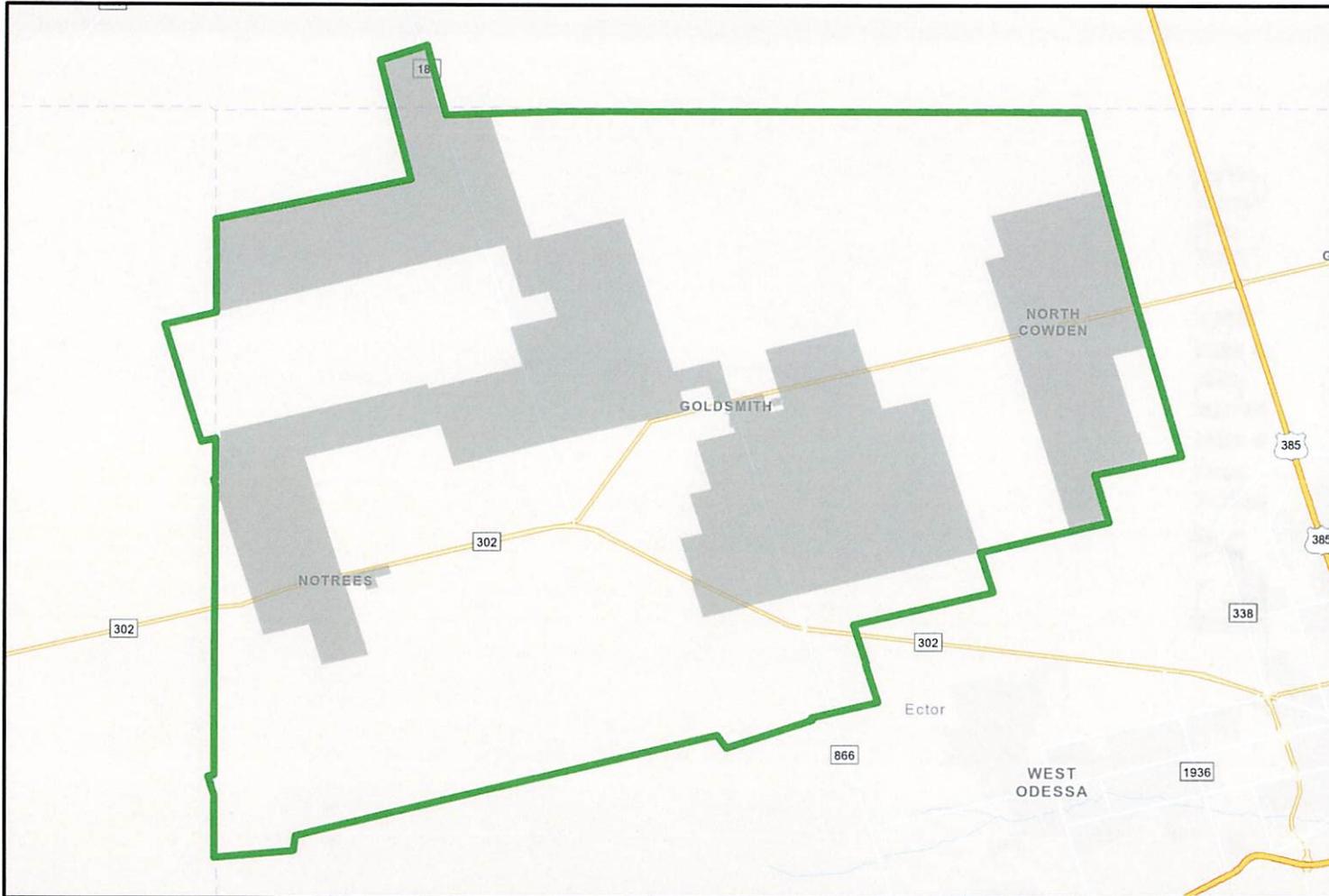


# **Exhibit 60**

# GOLDSMITH WIRE CENTER, TX (GLDSTXGS)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	3	2



Center: 102°38'3"W 31°57'47"N

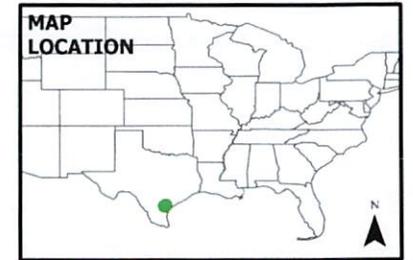
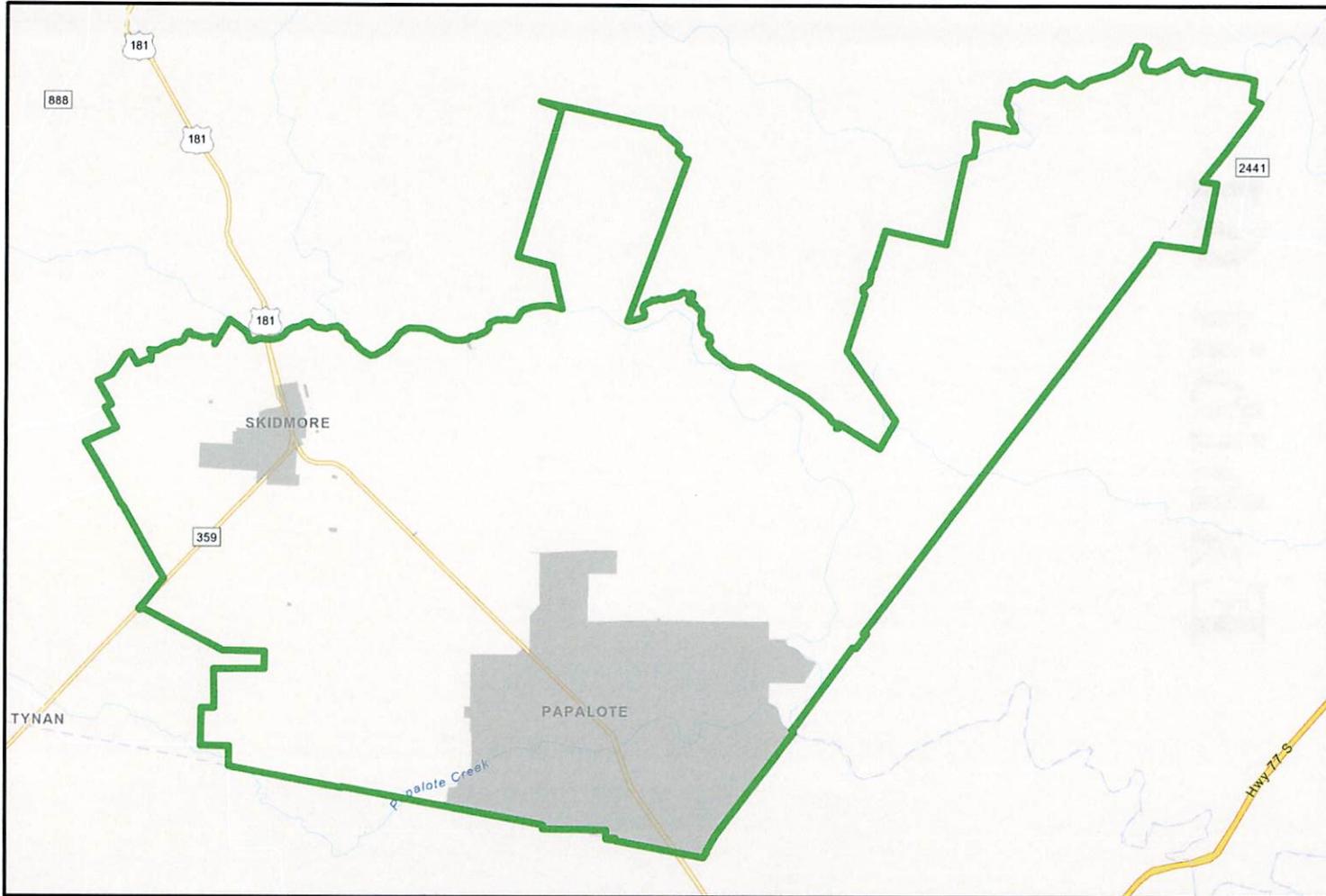


# **Exhibit 61**

# SKIDMORE WIRE CENTER, TX (SKDMTXSK)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	20	18



Center: 97°34'34"W 28°14'42"N



# **Exhibit 62**

# WESTBROOK WIRE CENTER, TX (WSBKTXWB)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	7	10



Center: 101°5'22"W 32°22'41"N

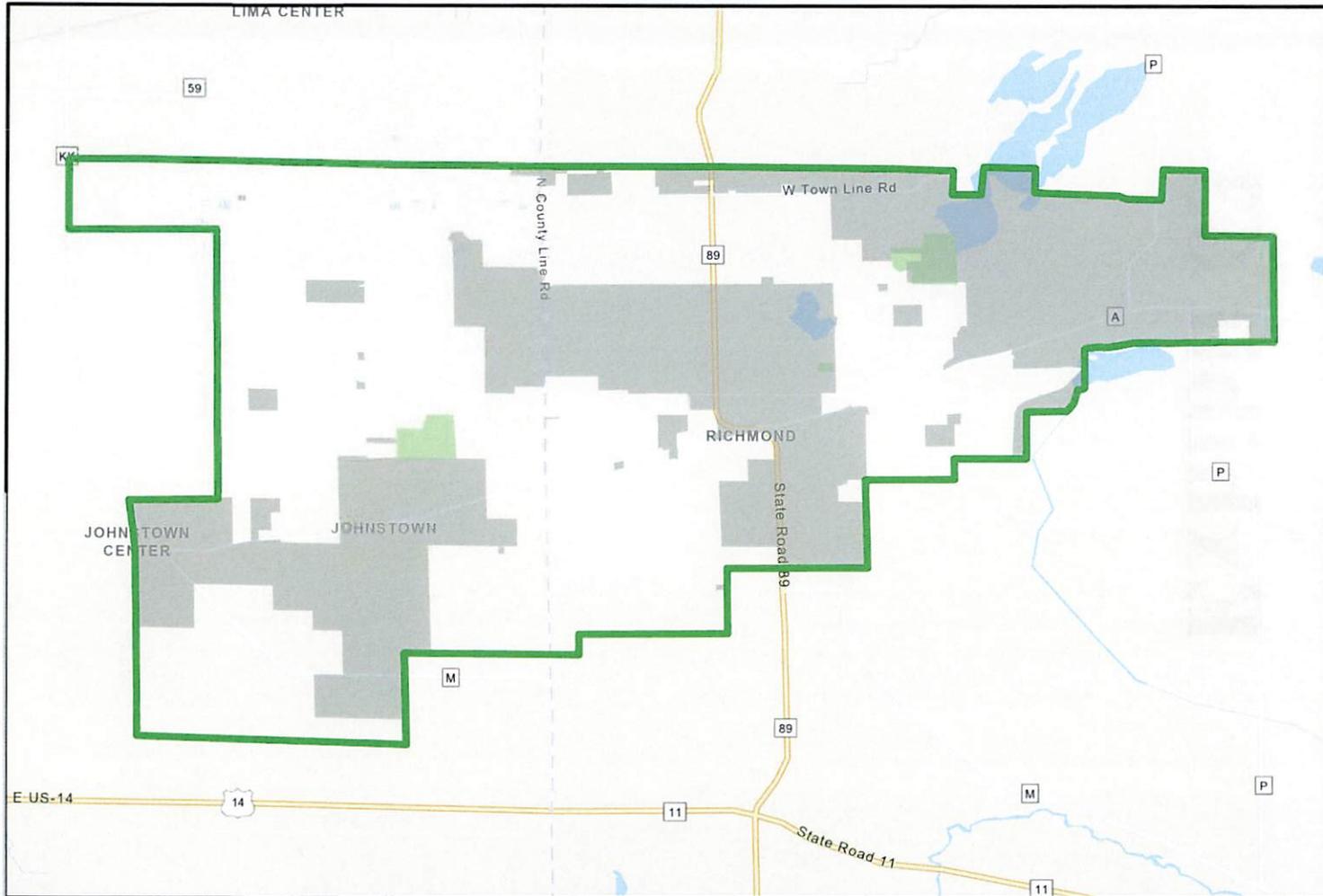


# **Exhibit 63**

# RICHMOND WIRE CENTER, WI (RCMDWI11)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	49	14



Center: 88°45'26"W 42°42'44"N

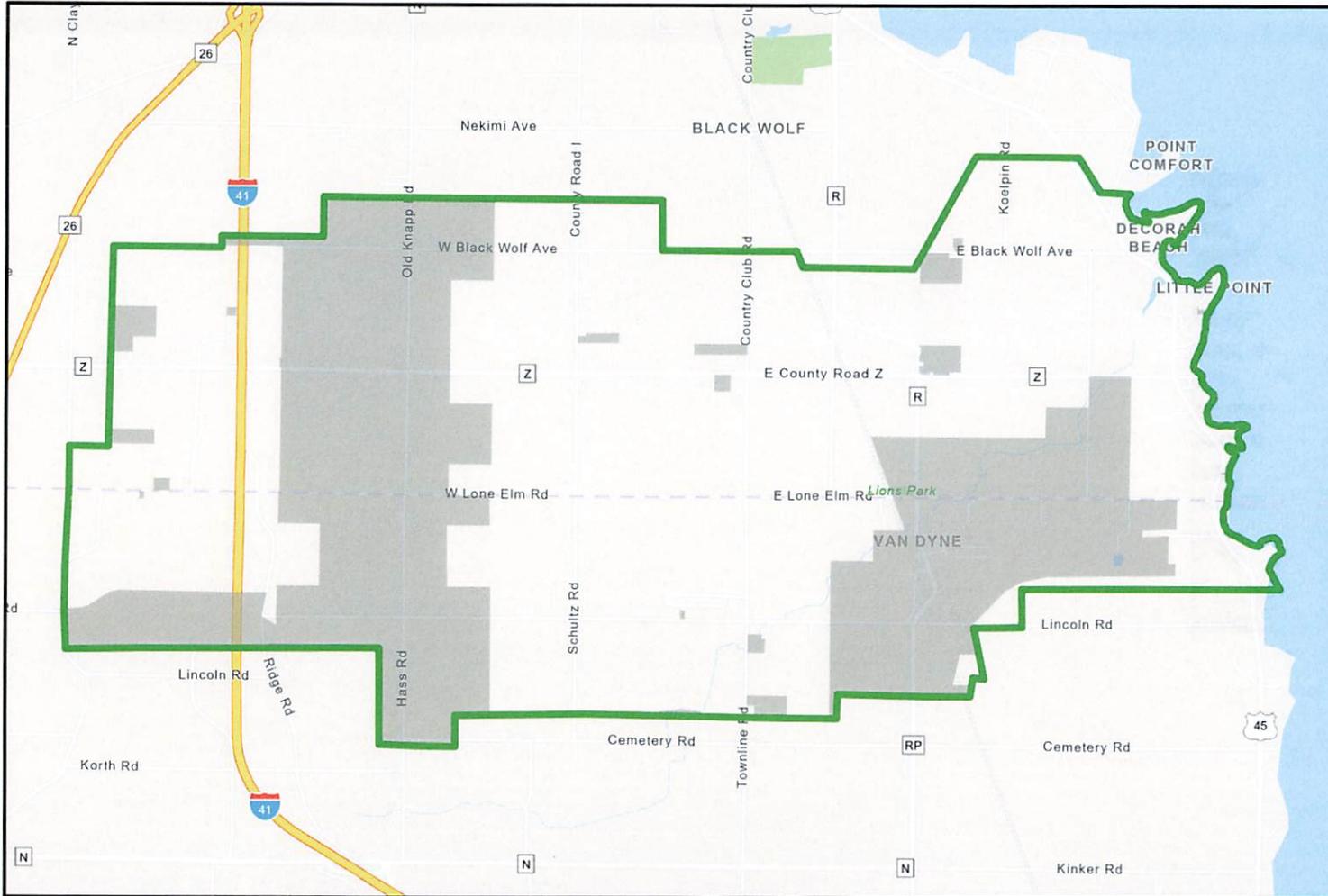


# **Exhibit 64**

# VAN DYNE WIRE CENTER, WI (VNDNWI11)

As of 25 OCT 2023

Service	AT&T Residential Local Service	AT&T Business Local Exchange Access Line Service
Number of Lines	14	2



Center: 88°31'58"W 43°53'57"N



**CERTIFICATE OF SERVICE**

I, **Kevin D. Horvitz**, certify that I have, on November 16, 2023 served a copy of the foregoing Section 63.71 Application of AT&T by U.S. Mail postage prepaid to the addresses on the attached sheets:

/s/ Kevin D. Horvitz  
Kevin D. Horvitz

Florida Public Service  
Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Office of the Governor  
The Capitol  
Tallahassee, FL 32399

Office of the Governor  
207 State House  
Springfield, IL 62706

Illinois Commerce  
Commission  
527 East Capitol Ave  
Springfield, IL 62701

Office of the Governor  
Statehouse  
Indianapolis, IN 46204

Indiana Utility Regulatory  
Commission  
PNC Center  
101 West Washington  
St.  
Suite 1500 E  
Indianapolis, IN 46204

Office of the Governor  
700 Capital Avenue  
Suite 100  
Frankfort, KY 40601

Kentucky Public Service  
Commission  
211 Sower Boulevard  
Frankfort, KY 40601

Louisiana Public Service  
Commission  
Galvez Building, 12th  
Floor  
602 North Fifth Street  
P.O. Box 91154  
Baton Rouge, LA 70821

Office of the Governor  
P.O. Box 94004  
Baton Rouge, LA 70804

Michigan Public Service  
Commission  
P.O. Box 30221  
Lansing, MI 48909

Office of the Governor  
P.O. Box 30013  
Lansing, MI 48909

Missouri Public Service  
Commission Public  
Information Office  
Governor Office Building  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO 65102

Office of the Governor  
Room 216  
State Capitol Building  
Jefferson City, MO 65101

Office of the Governor  
30th Floor  
77 South High Street  
Columbus, OH 43215

Public Utilities Commission  
of Ohio  
180 East Broad Street  
Columbus, OH 43215

Oklahoma Corporation  
Commission  
P.O. Box 52000  
Oklahoma City, OK 73152

Office of the Governor  
State Capitol Building  
2300 N. Lincoln Blvd.,  
Room 212  
Oklahoma City, OK 73105

Public Service Commission  
of South Carolina  
101 Executive Center Dr.  
Suite 100  
Columbia, SC 29210

Office of the Governor  
1205 Pendleton Street  
Columbia, SC 29201

Office of the Governor  
Tennessee State Capitol  
Nashville, TN 37243

Tennessee Regulatory  
Authority  
502 Deaderick Street  
Nashville, TN 37243

**Public Utility Commission  
of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, TX 78711**

**Office of the Governor  
P.O. Box 12428  
Austin, TX 78711**

**Public Service  
Commission of Wisconsin  
610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707**

**Office of the Governor  
Madison Office  
P.O. Box 7863  
Madison, WI 53707**

**Department of Defense  
Chief Information Officer  
6000 Defense Pentagon  
Washington, D.C. 20301**