Enclosed please find a copy of AT&T's § 63.71 Application, which was filed with the FCC. This courtesy copy is provided in compliance with 47 C.F.R. § 63.71(a).

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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 Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, and AT&T Tennessee; Indiana Bell Telephone Company, LLC, d/b/a AT&T Indiana; Michigan Bell Telephone Company, LLC, d/b/a AT&T Michigan; Southwestern Bell Telephone Company, LLC, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, LLC, d/b/a AT&T Wisconsin.

Authority Pursuant to Section 214 of The Communications Act of 1934, As Amended, To Discontinue the Provision of Service File No.

SECTION 63.71 APPLICATION OF AT&T

AT&T¹ 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 ("Commission") rules, 47 C.F.R. § 63.71, to discontinue DS1 and DS3 services provided by its ILEC affiliates in certain wire centers located in 11 states.

INTRODUCTION

Through this application, AT&T seeks to discontinue special access DS1 and DS3 services (the "Affected Services") in portions of certain wire centers located in 11 states (the "Affected Service Area"). On February 12, 2024, September 1, 2024, and March 7, 2025,

¹ AT&T Services, Inc. files this application on behalf of its affiliates set out in the caption.

AT&T received streamlined approval to grandfather the Affected Services in the Affected Service Area, as well as in additional wire centers not included in this filing.² As with AT&T's earlier grandfathering applications, discontinuing these outdated services will benefit the public and serve as an important step toward meeting both AT&T's and the Commission's goals of advancing toward next-generation technologies that customers are requesting.³

Demand for the Affected Services is very low, and businesses in the Affected Service Area have many cost-effective alternative options to choose from as replacements for the Affected Service Area. In the Affected Service Area, existing and prospective DS1 and DS3 customers, including wholesale customers, have the ability to secure cost effective alternatives through AT&T Switched Ethernet as well as other AT&T products that are superior to the Affected Services. In addition, there are an array of competitive offers available in the Affected Service Area, which many businesses have already selected in lieu of the Affected Services. These available alternatives include services offered over cable, fiber, fixed wireless, mobile wireless, and satellite technologies.

APPLICATION

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

² See Section 63.71 Application of AT&T, WC Docket No. 23-397 (filed Nov. 16, 2023) ("2023 Grandfathering Application"); *Id.*, WC Docket No. 24-229 (filed July 18, 2024) ("2024 Grandfathering Application"); *Id.*, WC Docket No. 25-45 (filed Jan. 31, 2025) ("2025 Grandfathering Application").

³ See News Release, Office of Chairman Brendan Carr, FCC Cutting Red Tape to Unleash New Infrastructure Investments: Streamlining Process to Retire Old Copper Lines, Freeing Up Dollars for New Networks (Mar. 20, 2025), https://docs.fcc.gov/public/attachments/DOC-410304A1.pdf.

Name and Address of Carrier:

BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, and AT&T Tennessee;

Indiana Bell Telephone Company, LLC, d/b/a AT&T Indiana;

Michigan Bell Telephone Company, LLC, d/b/a AT&T Michigan;

Wisconsin Bell, LLC, d/b/a AT&T Wisconsin;

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

The address for purposes of this application is:

208 South Akard Street Dallas, TX 75202

Date of Planned Service Discontinuance:

Effective on or after June 30, 2026, pending regulatory approval, AT&T's Affected Services will be discontinued.

Points of Geographic Areas of Service Affected:

AT&T plans to discontinue the Affected Services in the Affected Service Area in sections of 11 states: Alabama, Florida, Georgia, Indiana, Kentucky, Michigan, Missouri, Oklahoma, Tennessee, Texas, and Wisconsin. Exhibit 1 identifies the list of AT&T wire centers in each state that include any service areas that fall within the Affected Service Area.

Brief Description of Type of Service Affected:

AT&T plans to discontinue special access DS1 and DS3 services provided by its ILEC affiliates in the Affected Service Area.⁴ The Affected Services do not have any residential customers.

DS1 Service provides a point-to-point channel for the transmission of isochronous serial digital data at rates of 1.544 Mbps.

DS3 Service provides a point-to-point channel for the transmission of isochronous serial digital data at rates of 44.736 Mbps.

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

Customer notices were sent via U.S. Mail on June 30, 2025 for Affected Customers of the Affected Services.⁵ Copies of this 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

⁴ Depending on the location, DS1 service and DS3 service may be sold under different names. In Alabama, Florida, Georgia, Kentucky, and Tennessee, DS1s are sold as "DS1 (a.k.a. Bellsouth SPA DS1)" and DS3s are sold as "LightGate 1 Service (a.k.a. BellSouth SPA Point to Point Network 1 DS3 capacity)," "LightGate 2 Service (a.k.a. BellSouth SPA Point to Point Network 3 DS3 capacity)," "LightGate 3 Service (a.k.a. BellSouth SPA Point to Point Network 12 DS3 capacity)," and "LightGate 4 Service (a.k.a. BellSouth SPA Point to Point Network 24 DS3 capacity)." In Indiana, Michigan, and Wisconsin, DS1s are sold as "DS1 Service," and DS3s are sold as "DS3 Service." In Missouri, Oklahoma, and Texas, DS1s are sold as "DS1 (a.k.a. MegaLink 1.5 High Capacity Digital Service, MegaLink III – Wideband Digital Service 1.544 Mbps)," and DS3s are sold as "DS3 (a.k.a. DS3 Service, Southwestern Bell DS3 Service)."

⁵ An example notice is attached at Exhibit 2. In some wire centers, AT&T meets the criteria under 47 CFR § 63.71(*l*)(1)(ii) for discontinuing DS1 services on an expedited basis, because AT&T Switched Ethernet is offered throughout the Affected Service Area. However, for the administrative simplicity of addressing DS1 and DS3 in the same application, AT&T's customer notices provided an additional five days for commenting under 47 CFR § 63.71(a)(5)(i).

Area, and to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.⁶

Regulatory Classification of Carrier:

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

Questions about this application may be addressed to Meredith Williams, AT&T

Services, Inc., AVP – Federal Relations, 601 New Jersey Ave NW, Suite 400, Washington, DC,

(202) 227-9725.

Public Convenience and Necessity:

The public convenience and necessity will not be impaired by the discontinuance of these services. The Commission recognized close to a decade ago that DS1 and DS3 technologies would soon become "obsolete" in the face of significant advancement in competing services and changes in customer demand.⁷ That prediction has come to fruition, as demand for DS1 and DS3 services is very low. As a result, it is economically inefficient for AT&T to continue to provide the Affected Services.

Current customers in the Affected Service Area have many options to choose from in lieu of the Affected Services. Most importantly, in the Affected Service Area, existing and prospective DS1 and DS3 customers, including wholesale customers, can secure cost-effective alternatives through AT&T Switched Ethernet, AT&T Dedicated Internet, and AT&T Wavelength Metro Service. AT&T Business Fiber is also available in portions of the Affected

⁶ 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.

⁷ Business Data Services Order in an Internet Protocol Environment, Report and Order, 32 FCC Rcd 3459, ¶ 3 (2017), vacated in part on other grounds, Citizens Telecomms. Co. of Minn. v. FCC, 901 F.3d 991 (8th Cir. 2018) ("Business Data Services Order").

Service Area. AT&T highlighted these services as key alternatives to the Affected Services in its previous grandfathering applications covering these services in the Affected Area,⁸ and the Commission has long recognized the substitutability and superiority of Ethernet services over DS1 and DS3 services.⁹

There are other broadly available alternatives in the Affected Service Area, which many businesses have already selected in lieu of the Affected Services, including services from cable or fiber providers, such as Charter or Xfinity, among others. ¹⁰ Other customers in the Affected Service area may be instead purchasing services through fixed wireless providers, such as T-Mobile and/or Verizon. Still others may have switched to other wireless options in lieu of wired services, such as AT&T Wireless Broadband; mobile wireless service (voice and broadband) from providers including T-Mobile, Verizon, and/or AT&T; or service from satellite providers such as Viasat, HughesNet, or Starlink. ¹¹

⁸ See, e.g., 2023 Grandfathering Application at 16-18; 2024 Grandfathering Application at 1-2; 2025 Grandfathering Application at 6-7.

⁹ Business Data Services Order ¶¶ 23-24; see also Section 214 Application of Farmers Telecommunications Cooperative, Inc. for Authority to Discontinue Certain Services, WC Dkt No. 23-95 (filed Mar. 6, 2023) (discontinuing T1/DS1 service where Ethernet was available as a replacement service).

¹⁰ More than six years ago, the Commission identified "[t]he entry of cable into business data services provisioning" as "the most dramatic change in the market over the past decade," noting "the fact that every increment of additional investment in cable networks brings fiber facilities closer to nearby business data services demand and lowers the cost of building to meet that demand." Business Data Services Order ¶¶ 55-56. The Commission recognized that carriers — including AT&T — were losing business customers to broadband services from cable companies and noted the expected continued growth of cable business service offerings. *Id.* ¶¶ 30-31, 55-62.

¹¹ See Id. at ¶ 38 (predicting that "given the very high capacity of 5G networks, they have the potential to represent a significant additional source of competition for the provision of business data services."); see also Id. at ¶ 36. ("[s]atellite providers also offer business data services that are currently relied upon by many end users as acceptable substitutes for all or part of their broadband demand requirements.")

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, discontinuing the Affected Services in this area will not impair the public convenience or necessity.

CONCLUSION

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

By: /s/ Brett Farley

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

Exhibit 1

List of Affected Wire Centers

<u>Sections of Alabama</u>: Certain areas currently served by the following wire centers: Fort Payne (FTPYALMA), Parrish (PRSHALNM)

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

Big Pine (BGPIFLMA), Munson (MNSNFLMA), Pahokee (PAHKFLMA)

<u>Sections of Georgia</u>: Certain areas currently served by the following wire centers: Swainsboro (SWBOGAES), Tifton (TFTNGAMA)

<u>Sections of Indiana</u>: Certain areas currently served by the following wire centers:

Dale (DALEIN01)

<u>Sections of Kentucky</u>: Certain areas currently served by the following wire centers:

McDaniels (MCDNKYMA), Trenton (TRENKYMA), Utica (UTICKYMA)

<u>Sections of Michigan</u>: Certain areas currently served by the following wire centers: Willis (WILSMIWL)

<u>Sections of Missouri</u>: Certain areas currently served by the following wire centers:

Benton-314 (BNTNMOKI), Center (CNTRMOAM), Fulton (FLTNMOMI), Frohna

(FRHNMOTA), Lake Ozark (LKOZMOEN), Portage Des Sioux (PRSXMO68)

<u>Sections of Oklahoma</u>: Certain areas currently served by the following wire centers:

Luther (LTHROKMA), Noble (NOBLOKMA), Weleetka (WLTKOKMA)

<u>Sections of Tennessee</u>: Certain areas currently served by the following wire centers:

Airport Authority (NSVLTNAA), Cockrill Bend (NSVLTNCD)

<u>Sections of Texas</u>: Certain areas currently served by the following wire centers:

Childress (CHLDTXWE), San Diego (SNDGTXSD), Vinton (VNTNTXMA), Waco-China

Springs (WACOTXCS), Waco-Moody (WACOTXMD)

<u>Sections of Wisconsin</u>: Certain areas currently served by the following wire centers:

Columbus Wi (CLMBWIII)

Exhibit 2



June 30, 2025



Important Notice Regarding Interstate DS1 and DS3 Service – Effective on or After June 30, 2026

Thank you for using AT&T for your business service needs. We want to make you aware of planned changes to your interstate DS1 and DS3 Service in certain AT&T wire centers. Effective on or after June 30, 2026, pending regulatory approval, AT&T will no longer offer DS1 and DS3 Service at the locations listed at the bottom of this letter.¹

DS1 Service provides a point-to-point channel for the transmission of isochronous serial digital data at rates of 1.544 Mbps. DS3 Service provides a point-to-point channel for the transmission of isochronous serial digital data at rates of 44.736 Mbps.

Our records indicate that you currently purchased at least one of the Affected Services within at least one of the wire centers impacted by these changes. Your affected service addresses are listed below. As a <u>current</u> AT&T customer, you may retain your existing service(s) subject to the following changes:

- **Effective on or after June 30, 2026**, pending regulatory approval, AT&T will no longer offer DS1 Service or DS3 Service, after which it is subject to disconnection.
- Following the expiration of your current term agreement, AT&T will only allow renewal of the Service upon terms specified by AT&T, subject to AT&T's right to change the rates, terms, and conditions of the service upon notification.

You may continue to use the Affected Services until June 30, 2026. AT&T offers AT&T Switched Ethernet on Demand, AT&T Dedicated Internet (ADI), and AT&T VPN (AVPN) as replacements for DS1 and DS3 Services.

We are here to help if you have any questions about DS1 Service or DS3 Service. We are ready to provide support when and how you need it. Please contact your Account Manager with any questions you may have or contact us at 855-235-0900 for help. You can also visit https://www.business.att.com for additional information.

We appreciate your understanding and look forward to serving your business.

Sincerely, AT&T Business Services 208 S. Akard Street Dallas, TX 7520

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¹ The Affected Services are provided by the following AT&T entities: BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee; Indiana Bell Telephone Company, LLC, d/b/a AT&T Indiana; Michigan Bell Telephone Company, LLC, d/b/a AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, LLC, d/b/a AT&T Wisconsin.

Depending on the location, DS1 service and DS3 service may be sold under different names. In Alabama, Florida, Georgia, Kentucky, Louisiana, North Carolina, South Carolina, and Tennessee DS1s are sold as DS1 (a.k.a. Bellsouth SPA DS1) and DS3s are sold as LightGate 1 Service (a.k.a. BellSouth SPA Point to Point Network 1 DS3 capacity), LightGate 2 Service (a.k.a. BellSouth SPA Point to Point Network 12 DS3 capacity), and LightGate 4 Service (a.k.a. BellSouth SPA Point to Point Network 12 DS3 capacity), and LightGate 4 Service (a.k.a. BellSouth SPA Point to Point Network 12 DS3 capacity). In Indiana, Michigan, Ohio, and Wisconsin DS1s are sold as DS1 Service, and DS3s are sold as DS3 Service. In Arkansas, Missouri, Oklahoma, and Texas DS1s are sold as DS1 (a.k.a. MegaLink 1.5 High Capacity Digital Service, MegaLink III – Wideband Digital Service 1.544 Mbps) and DS3s are sold as DS3 (a.k.a. DS3 Service, Southwestern Bell DS3 Service).

³ A list of AT&T wire centers impacted by this notice is included at the end of this notice.

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 15 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 Inc., d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, AT&T Tennessee; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Communications of Indiana, LLC; Michigan Bell Telephone Company, LLC d/b/a AT&T Michigan; Ohio Bell Telephone Company, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, d/b/a AT&T Arkansas, AT&T Missouri, AT&T Oklahoma, AT&T Texas; 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.

To the extent your contract with AT&T is inconsistent with the above, these planned changes may not apply to you. Please check your contract or contact us with questions.

Below is a full list of AT&T wire centers affected by this notice:

List of Impacted Wire Centers

Alabama:

Fort Payne (FTPYALMA), Parrish (PRSHALNM)

Florida:

Big Pine (BGPIFLMA), Munson (MNSNFLMA), Pahokee (PAHKFLMA)

Georgia:

Swainsboro (SWBOGAES), Tifton (TFTNGAMA)

Indiana:

Dale (DALEIN01)

Kentucky:

McDaniels (MCDNKYMA), Trenton (TRENKYMA), Utica (UTICKYMA)

Michigan:

Willis (WILSMIWL)

Missouri:

Benton-314 (BNTNMOKI), Center (CNTRMOAM), Fulton (FLTNMOMI), Frohna (FRHNMOTA), Lake Ozark (LKOZMOEN), Portage Des Sioux (PRSXMO68)

Oklahoma:

Luther (LTHROKMA), Nobie (NOBLOKMA), Weleetka (WLTKOKMA)

Tennessee

Airport Authority (NSVLTNAA), Cockrill Bend (NSVLTNCD)

Texas

Childress (CHLDTXWE), San Diego (SNDGTXSD), Vinton (VNTNTXMA), Waco- China Springs (WACOTXCS), Waco-Moody (WACOTXMD)

Wisconsin:

Columbus Wi (CLMBWI11)

Service addresses in areas impacted by this notice:

• • • •

SERVICE ADDRESS	CITY	STATE	ZIP

CERTIFICATE OF SERVICE

I, Lacretia Hill, certify that I have, on July 15, 2025 served a copy of the foregoing Section 63.71 Application of AT&T by U.S. Mail postage prepaid to the addresses below.

/s/Lacretia Hill Lacretia Hill Alabama Public Service Commission 100 N. Union Street Suite 950 Montgomery, AL 36130

Office of the Governor State Capitol 600 Dexter Avenue Montgomery, AL 36130

Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Office of the Governor The Capitol 400 S. Monroe St. Tallahassee, FL 32399-0001

Georgia Public Service Commission 244 Washington Street, SW Atlanta, GA 30334

Office of the Governor Georgia State Capitol 206 Washington St. Suite 203 Atlanta, GA 30334

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

Office of the Governor Statehouse 200 W. Washington St. Indianapolis, IN 46204

Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

Office of the Governor 700 Capital Avenue Suite 100 Frankfort, KY 40601 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 Madison Street PO Box 360 Jefferson City, MO 65102-0360

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

Oklahoma Corporation Commission P.O. Box 52000 Oklahoma City, OK 73152-2000

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

Tennessee Regulatory Authority 502 Deaderick Street Nashville, TN 37243

Office of the Governor State Capitol Nashville, TN 37243-0001

Public Utility Commission of Texas 1701 N. Congress Avenue PO Box 13326 Austin, TX 78711-3326

Office of the Governor P.O. Box 12428 Austin, TX 78711 -2428 Public Service Commission of Wisconsin North Tower 6th Floor Hill Farms State Office Bld. 4822 Madison Yards Way Madison, WI 53707-7854

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

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

Grand Traverse Band of Ottawa & Chippewa Indians, Michigan Chairman 2605 N. West Bay Shore Dr. Peshawbestown, MI, 49682-9275

Iowa Tribe of Oklahoma 335588 East 750 Road Perkins, OK 74059

The Chickasaw Nation P.O. Box 1548 Ada, OK 74821

Kickapoo Tribe of Oklahoma P.O. Box 70 McLoud, OK 74851

Citizen Potawatomi Nation 1601 South Gordon Cooper Drive Shawnee, OK 74801

Absentee-Shawnee Tribe of Indians of Oklahoma 2025 South Gordon Cooper Drive Shawnee, OK 74801

The Muscogee (Creek) Nation P.O. Box 580 Okmulgee, OK 74447