



June 21, 2016

Via **US** Mail

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COMMISSION
CLERK

RE: Information Only Copy of Talk America Services, LLC Filing with the FCC

Dear Sir or Madam:

For information purposes only, please find enclosed a copy of the Application that Talk America Services, LLC filed with the FCC to discontinue offering of certain operator services throughout its service territory.

This copy is provided in accordance with Section 214 (a) of the Communications Act of 1934, as amended, and 47 C.F.R. §63.71 is provided in compliance with Federal Communications Commission's Rules.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant to Talk America Services, LLC

file: Talk America Services - FCC

ST/im

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

In the Matter of)
Section 63.71 Application of)
Talk America Services, LLC)
to Discontinue Services)

File No. _____

Section 63.71 Application of Talk America Services, LLC

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seek authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue offering certain operator services throughout its service territory in the United States.

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

1. *Name and corporate headquarters address of Carrier*

Talk America Services, LLC
10802 Executive Center Drive
Benton Building, Suite 300
Little Rock, AR 72211

Correspondence concerning this Application should be sent to:

Sharon Thomas
Consultant to Talk America Services, LLC
Technologies Management, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: stthomas@tminc.com

2. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the operator services that are the subject of this Application on or after August 1, 2016, pending the Commission's approval of the discontinuance. As explained below, Talk America Services relies on the wholesale provisioning of these services by the underlying carriers (e.g., AT&T and Verizon) of certain Windstream Communications' Competitive Local Exchange Carrier ("CLEC") subsidiaries from whom Talk America Services purchases services for resale to its end users. As a result, once the underlying carriers discontinue the operator service offerings, Talk America Services will no longer be able to purchase them for resale from the Windstream CLECs. For example, AT&T has already received approval to discontinue its operator services¹, and Verizon recently sent notice to the FCC of its proposed discontinuance of certain operator services, effective August 9, 2016.

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

Applicant proposes to discontinue the provision of the operator services in all states and in the District of Columbia.

4. *Brief Description of Types of Service Affected:*

Applicant proposes to discontinue the following operator services:

1. **Collect Calling** - a billing arrangement by which the charge for an operator assistance call may be reversed (charged to the called station) provided the charge is accepted at the called station.
2. **Person-to-Person Calling** - a service where the person originating an operator assistance call specifies to the operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or particular PBX service point, department, or office to be reached.

¹ It is the Applicant's understanding that AT&T has agreed to extend the availability of the operator services that are subject to its planned discontinuance to the Windstream CLECs whose services Talk America Services resells until August 1, 2016.

3. **Billed to Third Party** - a billing arrangement by which an operator assistance call may be charged to an authorized station other than the station originating the call or the station where the call is terminated.

4. **Busy Line Verification (BLV)** - allows an operator to establish a "talking" connection to an apparently busy station line to determine if the station line is in working order.

5. **Busy Line Interruption (BLI)** - allows an operator to interrupt a voice conversation in progress on a line to advise the interrupted subscriber that the interrupting party has a need to reach the subscriber.

6. **International Directory Assistance** - allows customers to obtain telephone numbers for international locations where such information is available.

Talk America Services proposes to discontinue these services for two reasons. First, in those locations where AT&T or Verizon is the underlying ILEC to the Windstream CLECs (who provides this service to Talk America Services), Talk America Services will no longer be able to offer these services on a retail basis once AT&T and Verizon discontinue their wholesale offerings.² Second, there has been very low demand for these services and Applicant believes such trend will only continue if not decrease even more, irrespective of the territory in which Talk America Services offers service. Therefore, Talk America Services intends to discontinue these offerings throughout its service territory, including locations where other ILECs provide wholesale operator services, such as CenturyLink, Frontier and Windstream, coincident with their anticipated discontinuance of these offerings.

These services have declined in popularity over the years due to the growth of other communication methods, including mobile phones, text messaging, email, and other social media applications. With respect to International Directory Assistance, many international telecommunications carriers no longer provide operator assistance services, which makes the service obsolete in those countries.

Talk America Services, through its underlying carriers, will continue to provide Sent Paid Calls (e.g., direct dial assistance), Emergency Call Assistance and rate quotes where currently provided.

² Talk America Services believes that other ILECs, such as CenturyLink, may also discontinue these operator services in the near future.

5. *Brief Description of Dates and Methods of Notice to All Affected Customers:*


The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice is being provided via bill messages sent to affected customers in the June 2016 bill cycles (June 1 – 28). The text of the customer notice is attached hereto as Exhibit A. Because certain operator services which are being discontinued (e.g., collect calling) may impact customers outside of a state where they receive local services from Talk America Services, and to avoid any customer confusion, we have indicated in the customer notice that the discontinuance affects all 50 states and the District of Columbia.

A copy of this Application is being sent to each of the affected state regulatory commissions, state governors' offices and the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

Conclusion

Talk America Services respectfully requests that the Commission approve its Section 63.71 Application to discontinue the Operator Services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31st day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 16th day of June, 2016.

By: 

Keith Harvey
Vice President, Assistant General Counsel
Talk America Services, LLC

Sharon Thomas, Consultant to
Talk America Services, LLC
Technologies Management, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: stomas@tminc.com

Exhibit A

Customer Notice

Exhibit A

Text of Customer Notice

Pending applicable regulatory approvals, on or after August 1, 2016, Talk America Services will no longer offer the following operator services: Person-to-Person calls, calls Billed to Third Party, Collect Calling, Busy Line Verification/Interruption Service, and International Directory Assistance in all 50 states and the District of Columbia.

A filing is being made with the FCC for discontinuance of Special Operator Services, including Person-to-Person calls, calls Billed to Third Party, Collect Calling, Busy Line Verification/Interruption Service, and International Directory Assistance. The FCC will normally authorize this proposed discontinuance of service 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 §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-855-546-5000 or customercare@talkamericaservice.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.