

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

In the Matter of )  
 ) WC Docket No. 16-\_\_\_\_\_  
Section 63.71 Application of )  
Comcast IP Phone, LLC )

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**SECTION 63.71 APPLICATION**

Comcast IP Phone, LLC (“Comcast”), hereby seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214(a), and Section 63.71 of the rules of the Federal Communications Commission (“FCC” or “Commission”), 47 C.F.R. § 63.71, to discontinue its offering and provision of Branch Office Voice (“BOV”). Comcast’s BOV offering involves voice over Internet protocol (“VoIP”) services as well as related auto-attendant, hunt group, toll-free number, voicemail, alternate number routing, and faxing capabilities provided to enterprise customers. Comcast has now deployed new Comcast voice offerings, such as Business Voice, that support the same functionalities. Comcast has only a limited number of BOV customers remaining – no more than twenty-six. Consequently, maintaining BOV as a standalone offering is no longer commercially viable or consistent with Comcast’s business plans.

Specifically, Comcast intends to stop offering BOV services to the public and to discontinue BOV services to its limited number of remaining customers on or after November 30, 2016. The proposed discontinuance will not result in material harm to these customers, as they may obtain alternative services from Comcast or a variety of other providers, including traditional TDM-based wireline providers, facilities-based VoIP providers, and non-facilities-based VoIP providers.

Comcast provides the following information pursuant to Section 63.71 of the Commission's rules:

1. Name and Address of Carrier: Comcast IP Phone, LLC, One Comcast Center, Philadelphia, PA 19103
2. Date of Planned Service Discontinuance, Reduction, or Impairment: Comcast plans to discontinue its provision of the BOV services on or after November 30, 2016. Comcast understands that this Application will be granted automatically on the 31st day after public notice of its filing unless the Commission notifies Comcast to the contrary.
3. Points of Geographic Areas of Service Affected: Comcast proposes to discontinue its offering and provision of the BOV services in Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, the District of Columbia, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New Mexico, New York, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, and Wisconsin.
4. Brief Description of Type of Service Affected: Comcast's BOV services and associated features enable VoIP calling, as well as related auto-attendant, hunt group, toll-free number, voicemail, alternate number routing, and faxing capabilities. These services are being discontinued because they are duplicative of other, newer Comcast offerings and therefore are no longer consistent with Comcast's business plans.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers: In accordance with Section 63.71(a), on September 29, 2016, Comcast provided written notice by first class mail to all affected customers. A sample copy of the notice provided to customers is attached hereto as Attachment A. In addition to this formal notification, Comcast previously contacted each of its customers to advise them of Comcast's plan to discontinue the BOV services, including through an informal notice letter in March 2016.
6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to be Discontinued, Reduced, or Impaired: Comcast is considered non-dominant with respect to the affected services.

In accordance with Section 63.71 of the Commission's Rules, a copy of this Application is being mailed to the Special Assistant for Telecommunications for the Secretary of Defense and to the public utility commission and the Governor of each state in which the discontinuance of service is proposed.

The public convenience and necessity will not be adversely affected by the discontinuance of the BOV services. All customers that will be affected have been given notice affording them ample time to acquire one of the many substitute services that are readily available. Comcast, therefore, respectfully requests Commission approval of this Section 63.71 Application. Please direct any questions regarding this Application to the undersigned.

Respectfully submitted,

Comcast IP Phone, LLC

/s/ Emily J. H. Daniels

Emily J. H. Daniels

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Comcast Corporation

One Comcast Center

Philadelphia, PA 19103

Tel: (215) 286-7893

Email: Beth\_Choroser@Comcast.com

Dated: September 30, 2016

**ATTACHMENT A**

# COMCAST BUSINESS

September 29, 2016

[Customer Name and Address]

[Customer Name],

We are writing to remind you that Comcast IP Phone, LLC (“Comcast”), intends to discontinue its offering and provision of Branch Office Voice (“BOV”) as soon as November 30, 2016. Comcast’s BOV offering includes voice over Internet protocol (“VoIP”) services as well as related auto-attendant, hunt group, toll-free number, voicemail, alternate number routing, and faxing capabilities. This discontinuance will affect service in Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, the District of Columbia, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New Mexico, New York, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, and Wisconsin.

Please note that you are responsible for making the necessary arrangements to transition to an alternative service provided by either Comcast or one of the many alternate service providers available in your area. Comcast will continue to provide you with reasonable support and assistance during your transition in order to minimize the potential for service disruptions. You also may continue to place orders for additional services at the prices specified in your agreement on a month-to-month basis until the BOV offering is discontinued.

Comcast has notified the Federal Communications Commission (“FCC” or “the Commission”) about its plan to discontinue these BOV services and features. 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, 445 12th Street, SW, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Comcast IP Phone, 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.

If you have any questions, you may contact Comcast at (866) 407-6338. As a valued Comcast customer, we appreciate the opportunity to serve you and will do our best to make your transition to a new Comcast service or new service provider as smooth as possible.

Sincerely,

Comcast IP Phone, LLC  
One Comcast Center  
Philadelphia, PA 19103

## CERTIFICATE OF SERVICE

I, Ruth E. Holder, hereby certify that a copy of the foregoing Section 63.71 Application of Comcast IP Phone, LLC was served on this 30th day of September, 2016, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below:

Office of Governor Robert J. Bentley  
State Capitol  
600 Dexter Avenue  
Montgomery, AL 36130

Alabama Public Service Commission  
P.O. Box 304260  
Montgomery, AL 36130

Office of Governor Doug Ducey  
Executive Tower  
1700 West Washington Street  
Phoenix, AZ 85007

Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007-2996

Office of Governor Asa Hutchinson  
State Capitol Room 250  
500 Woodlane Street  
Little Rock, AR 72201

Arkansas Public Service Commission  
P.O. Box 400  
Little Rock, AR 72203-0400

Office of Governor Edmund G. Brown, Jr.  
State Capitol, Suite 1173  
Sacramento, CA 95814

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Office of Governor John W. Hickenlooper  
136 State Capitol Building  
Denver, CO 80203

Colorado Public Utilities Commission  
1560 Broadway, Suite 250  
Denver, CO 80202

Office of Governor Dannel P. Malloy  
210 Capitol Avenue  
Hartford, CT 06106

Connecticut Public Utilities Regulatory  
Authority  
10 Franklin Square  
New Britain, CT 06051

Office of Governor Jack Markell  
150 Martin Luther King Jr. Boulevard South  
2nd Floor  
Dover, DE 19901

Delaware Public Service Commission  
861 Silver Lake Boulevard  
Cannon Building, Suite 100  
Dover, DE 19904

Office of Mayor Muriel Bowser  
1350 Pennsylvania Avenue N.W., Suite 316  
Washington, DC 20004

Public Service Commission of the  
District of Columbia  
1325 G Street N.W., Suite 800  
Washington, DC 20005

Office of Governor Rick Scott  
The Capitol  
400 South Monroe Street  
Tallahassee, FL 32399-0001

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

Office of Governor Nathan Deal  
206 Washington Street  
111 State Capitol  
Atlanta, GA 30334

Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334-9052

Office of Governor Bruce Rauner  
207 State House  
Springfield, IL 62706

Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

Office of Governor Mike Pence  
200 West Washington Street, Room 206  
Indianapolis, IN 46204

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

Office of Governor Sam Brownback  
Capitol  
300 Southwest 10th Avenue, Suite 241S  
Topeka, KS 66612-1590

Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

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

Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602-0615

Office of Governor John Bel Edwards  
P.O. Box 94004  
Baton Rouge, LA 70804

Louisiana Public Service Commission  
Galvez Building, 12th Floor  
602 North Fifth Street  
P.O. Box 91154  
Baton Rouge, LA 70821-9154

Office of Governor Paul LePage  
#1 State House Station  
Augusta, ME 04333-0001

Maine Public Utilities Commission  
18 State House Station  
Augusta, ME 04333-0018

Office of Governor Larry Hogan  
100 State Circle  
Annapolis, MD 21401-1925

Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul Street, 16th Floor  
Baltimore, MD 21202

Office of Governor Charlie Baker  
Massachusetts State House  
Room 280  
Boston, MA 02133

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

Office of Governor Mark Dayton  
116 Veterans Service Building  
20 W. 12th Street  
St. Paul, MN 55155

Office of Governor Phil Bryant  
P.O. Box 139  
Jackson, MS 39205

Office of Governor Jay Nixon  
P.O. Box 720  
Jefferson City, MO 65102

Office of Governor Maggie Hassan  
State House  
107 North Main Street  
Concord, NH 03301

Office of Governor Chris Christie  
P.O. Box 001  
Trenton, NJ 08625

Office of Governor Susana Martinez  
490 Old Santa Fe Trail, Room 400  
Santa Fe, NM 87501

Office of Governor Andrew M. Cuomo  
NYS State Capitol Building  
Albany, NY 12224

Massachusetts Department of  
Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

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

Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

Mississippi Public Service Commission  
P.O. Box 1174  
Jackson, MS 39215-1174

Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO 65102-0360

New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

New Jersey Board of Public Utilities  
44 South Clinton Avenue  
Trenton, NJ 08625

New Mexico Public Regulation Commission  
1120 Pasco De Peralta  
PERA Building  
P.O. Box 1269  
Santa Fe, NM 87504

New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Office of Governor John R. Kasich  
Riffe Center, 30th Floor  
77 South High Street  
Columbus, OH 43215-6117

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

Office of Governor Kate Brown  
State Capitol Building  
900 Court Street NE, 160  
Salem, OR 97301-4047

Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, OR 97308-1088

Office of Governor Tom Wolf  
508 Main Capitol Building  
Harrisburg, PA 17120

Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Office of Governor Nikki R. Haley  
1205 Pendleton Street  
Columbia, SC 29201

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

Office of Governor Bill Haslam  
1st Floor, State Capitol  
Nashville, TN 37243

Tennessee Regulatory Authority  
502 Deaderick Street  
Nashville, TN 37243

Office of Governor Greg Abbott  
P.O. Box 12428  
Austin, TX 78711-2428

Public Utility Commission of Texas  
1701 North Congress Avenue  
P.O. Box 13326  
Austin, TX 78711-3326

Office of Governor Gary R. Herbert  
350 North State Street, Suite 200  
P.O. Box 142220  
Salt Lake City, UT 84114-2220

Public Service Commission of Utah  
Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84114

Office of Governor Peter Shumlin  
109 State Street, Pavilion  
Montpelier, VT 05609

Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620-2701

Office of Governor Terry McAuliffe  
Common Ground for Virginia  
P.O. Box 1475  
Richmond, VA 23218

Virginia State Corporation Commission  
Division of Communications  
P.O. Box 1197  
Richmond, VA 23218

Office of Governor Jay Inslee  
P.O. Box 40002  
Olympia, WA 98504-0002

Washington Utilities and Transportation  
Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Office of Governor Earl Ray Tomblin  
State Capitol  
1900 Kanawha Boulevard, East  
Charleston, WV 25305

Public Service Commission of West Virginia  
201 Brooks Street  
Charleston, WV 25301

Office of Governor Scott Walker  
115 East Capitol  
Madison, WI 53702

Public Service Commission of Wisconsin  
P.O. Box 7854  
Madison, WI 53707-7854

Secretary of Defense  
Attn: Special Assistant for  
Telecommunications  
Pentagon  
1400 Defense Pentagon  
Washington, DC 20301-1400

/s/ Ruth E. Holder  
Ruth E. Holder