

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

In the Matter of)
)
Section 63.71 Application of)
)
BellSouth Telecommunications, LLC d/b/a)
AT&T Southeast)
)
)
For Authority Pursuant to Section 214 of)
The Communications Act of 1934, As Amended,)
To Discontinue the Provision of Service)

File No.

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COMMISSION
CLERK

**SECTION 63.71 APPLICATION OF BELLSOUTH TELECOMMUNICATIONS
LLC**

AT&T Services, Inc., on behalf of its affiliate, BellSouth Telecommunications, LLC d/b/a AT&T Southeast (“AT&T”), applies for authority under Section 214(a) of the Communications Act, as amended (“the Act”), 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 Voice Grade service (aka BellSouth Special Access DS0 VG Service), and Digital Data Access service (aka BellSouth Special Access DS0 Digital Data) throughout the lower keys in Florida.

AT&T deployed new facilities in these areas because of the severe flooding caused by Hurricane Irma, which completely destroyed AT&T’s copper facilities serving these areas.¹ After the storm, AT&T temporarily restored service using copper cable which is deteriorating at a rapid pace. As a result, AT&T replaced the copper cable in this area with

¹ <https://www.cnn.com/specials/hurricane-irma>.

a fiber-to-the-premises architecture, which will increase the broadband service options for this area. AT&T is discontinuing the above-referenced services because it is either uneconomical or technically infeasible to provision these services over the new architecture. AT&T offers AT&T Switched Ethernet Service as a replacement service to the affected customers.

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

For purposes of this 214 Application the address is as follows:
2180 Lake Blvd NE
Atlanta, GA 30319

Date of Planned Service Discontinuance:

AT&T plans to discontinue offering these services on or after November 1, 2018 or immediately upon approval of this application, whichever is first.

Points of Geographic Areas of Service Affected:

AT&T will no longer offer these services in the lower Keys mile marker 15 through mile marker 40 covering AT&T's Big Pine and Sugarloaf Key wire centers, which includes Big Pine Key, Ramrod Key, Summerland Key, Cudjoe Key, Howe Key, National Key Deer Refuge, Big Torch Key, Sugar Loaf Key, and Upper Sugar Loaf Sound.²

Brief Description of Type of Service Affected:

Voice Grade service (aka BellSouth Special Access DS0 VG Service) provides voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz

² See Map – Attachment A.

and may be terminated two-wire or four-wire. Voice Grade (a.k.a. BellSouth SPA DSO VG) channels are provided between customer designated premises or between a customer designated premises and a Telephone Company Hub.

Digital Data Access service (aka BellSouth Special Access DSO Digital Data) provides a channel for the digital transmission of synchronous serial data at rates of 2.4, 4.8, 9.6, 19.2, 56.0 or 64.0 kbps. The channel provides a synchronous service with timing provided by the Telephone Company through the Telephone Company's facilities to the customer in the received bit stream. Digital Data Access (a.k.a. BellSouth SPA DSO Digital Data) service is used to connect customer designated premises to a Telephone Company DDAS Hub.

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

Customer notices were sent via U.S. Mail on August 2, 2018.³ Copies of this Application are being sent, first class U.S. Mail, to the public utilities commission, governor of Florida, federally recognized tribes (if any), and to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.⁴

Regulatory Classification of Carrier:

AT&T offers these services pursuant to non-dominant carrier regulation.

³ See - Attachment B

⁴ 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.

Questions about this application may be addressed to Joshua Woodbridge, AT&T Services, Inc., Director - Federal Regulatory, 1120 20th Street N.W., Suite 1000, Washington, D.C. 20036, (202) 457-2139.

Conclusion:

The public convenience and necessity will not be adversely affected by the discontinuance of these services because there is very low demand for these services in the affected geographic area, and AT&T offers other fiber-based replacement services. AT&T respectfully requests the Commission approve its Section 63.71 Application to discontinue these services.

Respectfully submitted,

By: /s/Terri L. Hoskins

Terri L. Hoskins
Gary L. Phillips
David Lawson
AT&T Services, Inc.
1120 20th Street NW
Suite 1000
Washington, DC 20036

Its Attorneys

August 6, 2018

ATTACHMENT A

Mile Marker 40



ATTACHMENT B



August 2, 2018

AT&T
ATTN: Telecom Manager

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

Important Notice Regarding AT&T Services
Service Discontinuance *Effective 11/01/18*

Thank you for using AT&T for your business service needs. **Effective November 1, 2018**, pending regulatory approval where such approval is required, BellSouth Telecommunications, LLC, d/b/a AT&T Southeast in Florida ("AT&T") will be retiring the following services (the "AT&T Services") in the Sugarloaf and Big Pine wire centers in the Florida Keys:

Voice Grade service (aka BellSouth Special Access DS0 VG Service)
Digital Data Access service (aka BellSouth Special Access DS0 Digital Data)

We want to make you aware of planned changes to your SPECIAL-ANALOG-VOICEGRADE (AKA SPA DS0 VG) 7.

Our records indicate active BellSouth Telecommunications, LLC dba AT&T Analog Voice Grade Service to the following address(es):

Service Address: [REDACTED]

On September 10, 2017, Hurricane Irma hit southwest Florida, "leaving a trail of tornadoes and storm-surge flooding as its core slowly moved inland" (CNN). After the storm, AT&T temporarily restored service using copper cable which is deteriorating at a rapid pace. Due to the wear and tear on the copper cable, the chances are high that you could experience service deterioration or even an outage. As a result, AT&T replacing the copper cable in this area with a fiber-to-the-premises architecture, which will increase the broadband service options for this area. AT&T is discontinuing the above-referenced AT&T Services, because it is either uneconomical or technically infeasible to provision these services over the new architecture. **AT&T has decided to discontinue offering the AT&T Services at the Sugarloaf and Big Pine wire centers effective November 1, 2018.**

(Over)

While withdrawing the AT&T Services at the Sugarloaf and Big Pine wire centers, we offer **AT&T Switched Ethernet Service as a replacement solution at those locations**. AT&T Switched Ethernet Service uses fiber optic technology to connect each of your offices to our highly secure core Ethernet network and can support multiple Ethernet Virtual Channels, helping customers to manage their traffic as needed.

To help ensure service continuity, **it is recommended that you transition to AT&T Switched Ethernet Service or an alternate service arrangement by October 1, 2018**. Your AT&T Service Representative will be in contact soon to begin discussions regarding alternate solutions that meet your business communication needs.

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

Sincerely,

Maria King
Senior Product Marketing Manager

AT&T Services, Inc.
2180 Lake Blvd NE
Atlanta, GA 30319

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 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, LLC d/b/a AT&T Southeast. 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.

CERTIFICATE OF SERVICE

I, **Lacretia Hill**, certify that I have, on August 6, 2018 served a copy of the foregoing Section 63.71 Application of BellSouth Communications, LLC by U.S. Mail postage prepaid to the addresses below⁵:

/s/Lacretia Hill
Lacretia Hill

Office of the Governor
The Capitol
Tallahassee, FL 32399-0001

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

Department of Defense Chief Information
Officer
Attn: Military Asst./Mobility Team
The Pentagon
Washington, D.C. 20301

⁵ AT&T found not federally recognized tribal lands in the area affected by this service discontinuance.