

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 Louisiana, and AT&T Tennessee; Michigan Bell Telephone Company d/b/a AT&T Michigan; Southwestern Bell Telephone Company, d/b/a AT&T Missouri and AT&T Texas.

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

File No.

COMMISSION
CLERK

2023 NOV 27 AM 9:38

RECEIVED-FPSC

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 grandfather certain voice services provided over legacy facilities in sections of nine wire centers located in six states.

¹ AT&T Services, Inc. files this application on behalf of its affiliates BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Louisiana, and AT&T Tennessee; Michigan Bell Telephone Company d/b/a AT&T Michigan; Southwestern Bell Telephone Company, d/b/a AT&T Missouri and AT&T Texas.

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 VoIP services called AT&T Phone Service and AT&T Phone for Business where AT&T can only provide the services over copper (the "Affected Services") in portions of nine wire centers located in six states (the "Affected Service Area"). Grandfathering these services, which are outdated and prohibitively expensive for AT&T to maintain, will benefit the public and serve as an important step toward meeting both AT&T's and the Commission's goals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 Affected Service Area. Across the entire Affected Service Area covering over 17,000 Living Units, only 77 customers receive AT&T Phone Service over copper, and only 13 receive AT&T Phone for Business over copper.² Once the services are grandfathered, the small group of current

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

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 only *five* new orders for AT&T Phone Service over copper and *no* new orders for AT&T Phone for Business over copper over the past year in the Affected Service Area.

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 legacy voice services. 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 next-generation technologies using a variety of transmission means, including copper, fiber, and wireless spectrum-based services.”³ The effects of the technological transition are difficult to

³ Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure*

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.⁴

Investment, 32 FCC Rcd 11128, ¶ 1 (2017) (“*Accelerating Wireline Broadband Deployment Order*”).

⁴ 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 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>.

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,”⁵ 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.”⁶ In 2016, for example, the Commission adopted a test for streamlined treatment of applications seeking to discontinue legacy voice services.⁷ 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.⁸

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.”⁹ With this modernization, carriers “can dramatically reduce network costs, allowing providers to serve customers with

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”).

⁵ 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*”).

⁶ *Accelerating Wireline Broadband Deployment Order* ¶¶ 22, 33, 81.

⁷ See Second Report and Order, *Technology Transitions*, 31 FCC Rcd 8283, ¶ 65 (2016) (“*Second Technology Transitions Order*”).

⁸ 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*”).

⁹ *Id.* ¶ 20.

increased efficiencies that can lead to improved and innovative product offerings and lower prices.”¹⁰ These changes allow for “further investments in innovation that both enhance existing products and unleash new services, applications and devices, thus powering economic growth.”¹¹

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.”¹² 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.¹³ 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.¹⁴ As competition has swelled, including from cable providers, incumbent providers serve an ever-shrinking minority of residential and business wireline voice subscriptions.¹⁵ As the Commission summarized in 2020, American consumers

¹⁰ *2014 Technology Transitions Order* ¶ 2.

¹¹ *Id.*

¹² 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*”).

¹³ 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*”).

¹⁴ 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>.

¹⁵ 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 retail voice telephone connections); see also *id.* (showing that incumbent LEC switched access

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.”¹⁶ The declines in subscribership that the Commission has recognized show no sign of slowing.¹⁷

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.¹⁸ 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,¹⁹ while nearly \$7 billion from the connectivity fund is committed to support

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).

¹⁶ *Modernizing Unbundling and Resale Requirements Order* ¶ 23.

¹⁷ 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”).

¹⁸ 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.

¹⁹ 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.²⁰ 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.²¹

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.²² Last year marked the company's fifth straight year with 1 million or more net additions for AT&T Fiber.²³ 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.²⁴ 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 2025.²⁵

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*,

²⁰ 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>.

²¹ 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>.

²² 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”).

²³ 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>.

²⁴ See *id.*

²⁵ See *id.*

more than double the company's original year-end coverage target.²⁶ By the end of 2023, AT&T will reach *more than 200 million* people with mid-band 5G spectrum.²⁷ 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 described 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 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

²⁶ *See id.*

²⁷ *See* John T. Stankey Remarks.

origins of the Bell System. Maintaining the copper network, with its legacy telephone 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 Phone Service and AT&T Phone for Business provided over copper, in portions of nine out of 60 wire centers. The other applications concern AT&T Residential Local Service and AT&T Business Local Exchange Access Line Service; DS1 and DS3 services; and Remote Call Forwarding. 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.²⁸ 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

²⁸ 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, 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. Similarly, AT&T has discontinued, or will soon discontinue, AT&T Phone Service and AT&T Phone for Business where AT&T only provides either service over copper — the services at issue in this application — in 51 out of the 60 wire centers. Thus, this application only relates 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 AT&T Residential Local Service (AT&T's consumer POTS service), *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.

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.²⁹ By approving these grandfathering

²⁹ 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 Nine Wire Centers Where Almost All Customers Have Already Canceled Their AT&T Subscriptions in Favor of Cost-Effective Alternatives

This application concerns AT&T Phone Service and AT&T Phone for Business where AT&T can only provide the service over copper.³⁰ 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.

Demand for the Affected Services is exceptionally low and declining dramatically. Indeed, in 51 out of the 60 wire centers at issue in AT&T's concurrently filed application to grandfather legacy TDM-based voice services, AT&T has already discontinued the Affected Services due to a lack of *any* customers or demand in those areas. In the nine wire centers subject to this application, almost all individuals and businesses 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. Consequently, new orders for the Affected Services have all but evaporated in the Affected Service Area. In the past year, there were *no* new orders for AT&T Phone for Business over copper in the Affected Service Area, and only five new orders for AT&T Phone Service over copper. Across AT&T's

³⁰ AT&T will continue to accept new orders for AT&T Phone Service and AT&T Phone for Business Service in areas of these wire centers where AT&T can deliver AT&T Phone Service and AT&T Phone for Business Service over fiber.

entire footprint, retail customers for copper-based AT&T Phone Service have declined by 44% since December 2020.

The few existing users of the Affected Services have steadily been leaving for alternatives. Across the entire Affected Service Area, only 77 customers receive AT&T Phone Service over copper, and only 13 receive AT&T Phone for Business over copper, out of over 17,000 Living Units. *See* Ex. 1 (providing detail on the number of subscribers to the Affected Services in each affected wire center). That reflects a decrease of subscribers to AT&T Phone Service over copper by approximately 60% and a decrease of subscribers to AT&T Phone for Business over copper by approximately 48% since the end of 2020.

As the table at Exhibit 1 shows, there are *no* customers for one of the Affected Services in many of the wire centers within the Affected Service Area, and in all cases there is less than a de minimis number of customers.³¹ For example, there are no subscribers to AT&T Phone for Business over copper in six out of the nine wire centers subject to this application, and there are no more than 16 residential customers for AT&T Phone Service over copper in any of the eight wire centers that have subscribers to this service. Less than 1% of living units in the Affected Service Area subscribe to either of the Affected Services.

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

³¹ 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. 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.

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 legacy 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."³² 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 of the nine wire centers subject to this application. Customers in the Affected Service area also can purchase internet 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

³² *Modernizing Unbundling and Resale Requirements Order* ¶ 58.

throughout Affected Service Area.³³ All of these services are regularly advertised as cost-effective and superior alternatives to the Affected Services.³⁴

³³ 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.

³⁴ 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 (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 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”).

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 legacy voice services. 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 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 voice services. They also reduce or eliminate the downtime associated with hard-to-service copper lines after an outage, and 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. For example, AP-A comes with access to Digital Phone Call Protect, a spam-prevention feature which helps protect users against unwanted calls that are plaguing the American public. As the Commission has observed, U.S. consumers receive approximately 4 billion robocalls per

month.³⁵ They are the “FCC’s top consumer complaint and [the FCC’s] top consumer protection priority.”³⁶ AT&T is deeply committed to tackling this problem, and AP-A helps protect 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.³⁷ Over 180,000 AT&T customers have opted to receive Digital Phone Call Protect service as of March 2021.³⁸

Customers of AP-A Business also benefit from remote monitoring of connections, hardware, performance, and service continuity that is not available for customers of the Affected Services. A customer need not wait until it does not receive a dial tone to learn that a pest chewed through an old copper 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

³⁵ 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).

³⁶ 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”).

³⁷ 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.”)

³⁸ *Id.*

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.³⁹

AP-A and AP-A Business are also 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 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

³⁹ 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).

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 legacy 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 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 been 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;

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

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

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, 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.⁴⁰ 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: Fort George (FTGRFLMA), Sugarloaf Key (SGKYFLMA);

Sections of Louisiana: Certain areas currently served by the following wire center: Mer Rouge (MRRGLAMA);

Sections of Michigan: Certain areas currently served by the following wire center: Chassel (CHSLMIMN);

Sections of Missouri: Certain areas currently served by the following wire center: Delta (DELTMO SW);

Sections of Tennessee: Certain areas currently served by the following wire centers: Nashville (NSVLTNAA), Troy (TROYTNMT);

Sections of Texas: Certain areas currently served by the following wire centers: Bayside (BYSCTXBY), and Goldsmith (GLDSTXGS).

Brief Description of Type of Service Affected:

AT&T plans to grandfather AT&T Phone Service and AT&T Phone for Business in the Affected Service Area where AT&T can only provide the service over copper. As noted above, AT&T will continue to accept new orders for AT&T Phone Service and AT&T Phone for Business in areas of these wire centers where AT&T can deliver AT&T Phone Service and

⁴⁰ In some instances, an entire wire center is included in the Affected Service Area. In other instances, only specific sections of service area within a wire center, called "Distribution Areas" or "DAs," are included in the Affected Service Area.

AT&T Phone for Business over fiber. The number of current customers for each Affected Service is depicted in Exhibit 1.

AT&T Phone Service is an enhanced voice communication service that converts voice communications into Internet Protocol (IP) packets that are carried over AT&T's IP network — *i.e.*, “voice over IP” or “VoIP.” AT&T Phone Service includes direct-dialed calling and certain calling and call management features, as well as additional or advanced features that may be offered at additional costs, all of which AT&T, in its sole discretion, may add, modify, or delete from time to time. AT&T Phone Service also includes a telephone number or numbers that will be included in printed directories and/or directory assistance databases, and options, available at additional costs, to have numbers withheld from printed directories and/or directory assistance databases. It is not mobile or nomadic and will function only where installed.

AT&T Phone for Business provides an enhanced voice communication service that converts voice communications into Internet Protocol (IP) packets that are carried over AT&T's IP network. It may be generically referred to as “voice over IP” or “VoIP.” The service includes direct-dialed calling and certain calling and call management features or advanced features associated with the 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 14-21).

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

Customer notices were sent via US Mail on October 27, 2023, for affected customers of AT&T Phone Service; and on October 31, 2023, for affected customers of AT&T Phone for Business.⁴¹ 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 Area, and to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.⁴²

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.

⁴¹ Example notices are attached at Exhibits 2-3. Exhibit 2 is a representative example of the notice sent to subscribers to AT&T Phone Service over copper in the Affected Service Area. Exhibit 3 is a representative example of the notice sent to subscribers of AT&T Phone for Business over copper in the Affected Service Area.

⁴² 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 Services¹

Data as of 10/25/2023

Wire Center (CLLI)	State	AT&T Phone Service — Customer Count	AT&T Phone for Business — Customer Count
Fort George (FTGRFLMA)	FL	2	0
Sugarloaf Key (SGKYFLMA)	FL	13	0
Mer Rouge (MRRGLAMA)	LA	13	3
Chassel (CHSLMIMN)	MI	16	0
Delta (DELTMO SW)	MO	5	0
Cockrill Bend (NSVLTNCD)	TN	0	7
Troy (TROYTNMT)	TN	16	3
Bayside (BYSDTXBY)	TX	5	0
Goldsmith (GLDSTXGS)	TX	7	0
Total		77	13

¹ AT&T only seeks to grandfather AT&T Phone Service or AT&T Phone for Business where AT&T can only provide the service over copper. AT&T will continue to accept new orders for AT&T Phone Service and AT&T Phone for Business in areas of these wire centers where AT&T can deliver the service over fiber. Customer count data in this table only includes customers receiving AT&T Phone Service or AT&T Phone for Business over copper.

Exhibit 2



Account Information
Account ending: [REDACTED]



We'll no longer be accepting orders for AT&T Phone service in your area

Hi [REDACTED],

Effective on or after December 31, 2023, pending regulatory approval, we'll¹ no longer accept new orders for AT&T Phone Service in your area.² **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.

Here's why we're no longer accepting new AT&T Phone orders:

Due to low demand for our home phone services 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 home phone service or know someone moving to the area?

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

¹ In the areas impacted by this notice, AT&T Phone Service is provided by BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Louisiana, and AT&T Tennessee; Michigan Bell Telephone Company d/b/a AT&T Michigan; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, and AT&T Texas.

² This action only affects AT&T Phone Service in areas of the following wire centers where AT&T can only offer the service over its aging, copper-based platform: **Florida:** Fort George (FTGRFLMA), Sugarloaf Key (SGKYFLMA); **Louisiana:** Mer Rouge (MRRGLAMA); **Michigan:** Chassel (CHSLMIMN); **Missouri:** Delta (DELTMO SW); **Tennessee:** Nashville (NSVL TNCD), Troy (TROY TNMT); **Texas:** Bayside (BYS DTXBY), Goldsmith (GLDSTXGS). AT&T will continue to accept new orders for AT&T Phone Service in areas of these wire centers where AT&T can deliver AT&T Phone Service over fiber.

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 of BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Louisiana, and AT&T Tennessee; Michigan Bell Telephone Company d/b/a AT&T Michigan; Southwestern Bell Telephone Company, d/b/a AT&T Missouri, and AT&T Texas. 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 3



October 31, 2023



**Important Notice Regarding AT&T Phone for Business with AT&T Internet for Business
Change in Service Effective on or after December 31, 2023**

Thank you for using AT&T for your business service needs. We want to make you aware of planned changes to AT&T Phone for Business service in certain AT&T wire centers.¹ Our records indicate that you currently purchase AT&T Phone for Business within at least one of the AT&T wire centers impacted by these changes.²

AT&T Phone for Business provides an enhanced voice communication service that converts voice communications into Internet Protocol (IP) packets that are carried over AT&T's IP network. It may be generically referred to as "voice over IP" or "VoIP." The service includes direct-dialed calling and certain calling and call management features or advanced features associated with the service.

Effective on or after December 31, 2023, pending regulatory approval, AT&T Phone for Business will no longer be available for purchase by new or existing customers in certain AT&T wire centers. 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 – Advanced and AT&T Office@Hand as replacements for AT&T Phone for Business.

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

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

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

(Over)

¹ In the areas impacted by this notice, AT&T Phone for Business is provided by BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Louisiana, and AT&T Tennessee; Michigan Bell Telephone Company d/b/a AT&T Michigan; Southwestern Bell Telephone Company, d/b/a AT&T Missouri and AT&T Texas.

² This action only affects AT&T Phone for Business in areas of the following wire centers where AT&T can only offer the service over its aging, copper based platform: **Florida:** Fort George (FTGRFLMA), Sugarloaf Key (SGKYFLMA); **Louisiana:** Mer Rouge (MRRGLAMA); **Michigan:** Chassel (CHSLMIMN); **Missouri:** Delta (DELTMO SW); **Tennessee:** Nashville (NSVLTNCD), Troy (TROYTNMT); **Texas:** Bayside (BYSDTXBY), Goldsmith (GLDSTXGS). AT&T will continue to accept new orders for AT&T Phone for Business in areas of these wire centers where AT&T can deliver AT&T Phone for Business over fiber.

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 § 63.71 Application of BellSouth Telecommunications, LLC, d/b/a AT&T Florida, AT&T Louisiana, and AT&T Tennessee; Michigan Bell Telephone Company d/b/a AT&T Michigan; Southwestern Bell Telephone Company, d/b/a AT&T Missouri and AT&T Texas. Comments should include specific information about the impact of this proposed discontinuance (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

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 below.

/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

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
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

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