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

In the Matter of

Section 63.71 Application of

AT&T Services, Inc., on behalf of its affiliate
BellSouth Telecommunications, LLC, d/b/a
AT&T Florida and AT&T Tennessee

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

File No.

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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 legacy voice services in sections of four wire centers located in two states.

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

¹ AT&T Services, Inc. files this application on behalf of its affiliate BellSouth Telecommunications, LLC, d/b/a AT&T Florida and AT&T Tennessee.

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 Remote Call Forwarding Service or TeleBranch (referred to collectively as "RCF" or the "Affected Service") in sections of two States, Florida and Tennessee (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 Grandfathering these services, which are outdated and prohibitively expensive for AT&T to maintain, will benefit the public and serve as an important step toward meeting both AT&T's and the Commission's goals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 Service in the Affected Service Area. AT&T only has *four* customers of the Affected Service in an area covered by over 10,000 Living Units.² Once the services are grandfathered, the small group of current customers that have not already abandoned the Affected Service will be able to keep their current service. Only prospective customers in the Affected Service Area will be unable to purchase the Affected Service, and there are virtually no such prospective customers. In fact, over the past year, AT&T only received *one* new order for RCF in the Affected Service Area.

Businesses in the Affected Service Area have many cost-effective alternative options to choose from as replacements for the Affected Service. These alternative options include remote call forwarding on AT&T Phone for Business – Advanced ("AP-A Business") — which AT&T

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

designed as reliable and cost-effective alternatives to the legacy voice services.³ They also include an array of competitive voice offerings with call forwarding services that are offered over cable, fiber, and mobile wireless technologies, which most businesses in the Affected Service Area have already selected in lieu of the Affected Service.

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.”⁴ The effects of the technological transition are difficult to 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

³ Today, AT&T does not seek to *discontinue* legacy TDM-based voice services, only to grandfather them. This application satisfies the appropriate test to grandfather these services, because the public convenience and necessity will not be adversely affected by the grandfathering of the Affected Service. See Second Report and Order, *Technology Transitions*, 31 FCC Rcd 8283, ¶ 64 (2016) (“*Second Technology Transitions Order*”) (indicating that the requirements for streamlined treatment under the Adequate Replacement Test only apply to applications to “discontinue a legacy TDM-based voice service,” not to grandfather one).

⁴ Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, 32 FCC Rcd 11128, ¶ 1 (2017) (“*Accelerating Wireline Broadband Deployment Order*”).

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.⁵

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,”⁶ and it has taken steps to help “eliminate unnecessary delays” in the discontinuance of legacy services that customers heading

⁵ 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.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”).

⁶ 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*”).

toward a “world without copper” have “largely . . . abandoned.”⁷ In 2016, for example, the Commission adopted a test for streamlined treatment of applications seeking to discontinue legacy voice services.⁸ 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.⁹

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.”¹⁰ With this modernization, carriers “can dramatically reduce network costs, allowing providers to serve customers with increased efficiencies that can lead to improved and innovative product offerings and lower prices.”¹¹ These changes allow for “further investments in innovation that both enhance existing products and unleash new services, applications and devices, thus powering economic growth.”¹²

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

⁷ *Accelerating Wireline Broadband Deployment Order* ¶¶ 22, 33, 81.

⁸ *See Second Technology Transitions Order* ¶ 65.

⁹ 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*”).

¹⁰ *Id.* ¶ 20.

¹¹ *2014 Technology Transitions Order* ¶ 2.

¹² *Id.*

wireless providers, as well as from mobile wireless providers.”¹³ 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.¹⁴ 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.¹⁵ As competition has swelled, including from cable providers, incumbent providers serve an ever-shrinking minority of residential and business wireline voice subscriptions.¹⁶ As the Commission summarized in 2020, American consumers 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

¹³ 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*”).

¹⁴ 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*”).

¹⁵ 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>.

¹⁶ 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 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).

“will only accelerate” with the “widespread deployment of 5G wireless networks.”¹⁷ The declines in subscribership that the Commission has recognized show no sign of slowing.¹⁸

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.¹⁹ 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,²⁰ while nearly \$7 billion from the connectivity fund is committed to support approximately 18 million students, 11,200 schools, and 1,000 libraries nationwide.²¹ 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.²²

¹⁷ *Modernizing Unbundling and Resale Requirements Order* ¶ 23.

¹⁸ 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”).

¹⁹ 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.

²⁰ 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>.

²¹ 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>.

²² 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>.

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.²³ Last year marked the company's fifth straight year with 1 million or more net additions for AT&T Fiber.²⁴ 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.²⁵ 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 2025.²⁶

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*, more than double the company's original year-end coverage target.²⁷ By the end of 2023, AT&T will reach *more than 200 million* people with mid-band 5G spectrum.²⁸ 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.

²³ 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").

²⁴ 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>.

²⁵ *See id.*

²⁶ *See id.*

²⁷ *See id.*

²⁸ *See* John T. Stankey Remarks.

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 discussed in more detail in the following section, 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 TDM-based 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 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 RCF, which AT&T currently offers in only four wire centers. The other

three applications concern AT&T Residential Local Service and AT&T Business Local Exchange Access Line Service (AT&T's POTS services), certain VoIP services provided over copper, and DS1 and DS3 services. 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 costs 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.²⁹ 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 center. For example, AT&T has discontinued, or will soon discontinue, certain VoIP services provided over copper in 51 out of the 60 wire centers. Thus, AT&T's application relating to those VoIP services — AT&T Phone Service and AT&T Phone for Business Service — only relates to nine wire centers. Similarly, AT&T has discontinued, or will soon discontinue, RCF — the service at issue in this application — in 56 out of the 60 wire centers, because of a lack any customer demand for the service in those wire centers. Thus, this application only relates to four wire centers.

²⁹ 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.

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), *one* new order for RCF, *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.³⁰ By approving these grandfathering 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 RCF Service in Four Wire Centers Where There Is Virtually No Demand for the Service and Where There Are Many Cost-Effective Alternatives

This application concerns RCF. AT&T has notified the users of the “Affected Service” 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 Service will no longer be available for purchase by new customers in the Affected Service Area.

³⁰ 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).

The demand for this Affected Service is exceptionally low. Across the entire Affected Service Area, which consists of four wire centers in two states, only *four* unique customers receive the Affected Service, through six circuits. *See* Ex. 1 (providing detail on the number of subscribers to the Affected Service in each affected wire center). This limited demand has persisted in recent years: Since 2022, there has been only *one* new customer for the Affected Service in the Affected Service Area. And in the other 56 wire centers subject to the applications AT&T is filing today, there are *no* customers and there has been *no* recent demand for the Affected Service. Accordingly, as noted above, AT&T has already discontinued or will soon discontinue RCF service in those 56 wire centers of the 60 wire centers, because there were no customers and AT&T received no reasonable requests for service in the 30 days preceding discontinuance.

Customers in the Affected Service Area have access to many readily available and cost-effective alternatives to the Affected Service. For example, according to Commission data, customers in the four wire centers can receive broadband and voice services from multiple cable and fiber providers, including companies, like Comcast, Charter, and/or Google Fiber. Those providers' voice offerings include remote-call-forwarding features.³¹ Voice options through CMRS providers also allow for remote call forwarding.

³¹ *See, e.g.*, Charter – Spectrum: How to Forward or Transfer a Landline Number to a Cell Phone, <https://www.communityphone.org/blogs/spectrum-forward-transfer-landline> (last visited Oct. 16, 2023); Comcast – Activate Remote Call Forwarding, <https://business.comcast.com/support/article/voice/phone-activate-remote-call-forwarding-rcf> (last visited Oct. 16, 2023); Comcast – Use the Xfinity Voice Call Forwarding Feature, <https://www.xfinity.com/support/articles/forward-calls-with-call-forwarding> (last visited Oct. 16, 2023); Google Fiber – Keep your business up and running even faster, <https://fiber.google.com/business/> (last visited Oct. 16, 2023) (“Google Fiber is working with Dialpad Business Phone System to offer Google Fiber Business customers 25% off of Dialpad service. With Dialpad, you get consolidated communications to call, chat, text, and video conference with colleagues and clients through a single, secure application with the speed and

Additionally, AT&T now offers AP-A Business in the Affected Service Area. AT&T specifically designed this service, which offers remote call forwarding, as a cost-effective alternative to legacy TDM-based voice services.³² AP-A Business leverages 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 6,669 business customers using AP-A Business.

AP-A Business allows customers to use their existing TDM-based telephones, inside wiring, and phone jacks to make and receive voice calls. AP-A Business transmits 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 Business can offer customers greater redundancy and reliability than legacy services. It also reduces or eliminates the downtime associated with hard-to-service POTS lines after an outage and offers 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 Business provides reliable service with superior quality and lower maintenance costs than legacy copper-based voice service. AP-A Business also includes a number of prized features in addition to remote call forwarding, such as unlimited

reliability of Google Fiber Business.”); Dialpad Help Center – Call Forwarding FAQs, <https://help.dialpad.com/docs/call-forwarding-faqs> (last visited Oct. 16, 2023) (noting that you can add up to five forwarding numbers on your Dialpad account).

³² See AT&T Phone Business-Advanced – What is AT&T Phone for Business - Advanced?, <https://www.business.att.com/products/att-phone-for-business-advanced.html> (last visited Oct. 16, 2023) (explaining that phone features include, “Fixed Call Forwarding with calling hours, and more”); AT&T Phone-Advanced – New AT&T Phone-Advanced, <https://www.att.com/home-phone/phone-advanced/> (last visited Oct. 16, 2023) (noting that features include call forwarding).

domestic long-distance calling, caller ID, call waiting, 3-way calling, and anonymous call blocking.³³

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, and AT&T Tennessee

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 Service 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 Service in the Affected Service Area set forth below. The list below identifies the wire centers in each State that include any service areas that

³³ In addition to being feature-rich, AP-A Business is designed for ease of use. The service is 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 AP-A Business is available for comparable or even lower price than existing TDM-based 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 Business's interoperability with legacy technologies and peripherals, which enables customers to extend the useable lifespan of their TDM-based devices.

fall within the Affected Service Area.³⁴ The *shaded* portions of exhibits 3 through 6 identify the sections of each wire center included within the Affected Service Area. The number of current customers for the Affected Service in each wire center 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 center: Sugar Loaf Key (SGKYFLMA) (Ex. 3);

Sections of Tennessee: Certain areas currently served by the following wire centers: Nashville (NSVLTNAA) (Ex. 4), Nashville (NSVLTNCD) (Ex. 5), and Troy (TROYTNMT) (Ex. 6).

Brief Description of Type of Service Affected:

AT&T plans to grandfather RCF in the Affected Service Area. As indicated above, the small number of current customers for this Affected Service is depicted in Exhibit 1. There have been no new customers in the past year.

RCF permits a customer in one exchange to arrange for calls made to a different telephone number in the same or different exchange (where RCF facilities are available) to be automatically forwarded and automatically billed to the customer's station.³⁵ In other words, RCF is a service whereby incoming calls to the RCF telephone number are automatically forwarded by the Company's central office equipment to another number designated by the customer.

³⁴ In some instances, only specific sections of service area within each wire center, called "Distribution Areas" or "DAs," are included in the Affected Service Area.

³⁵ AT&T, *AT&T Remote Call Forwarding* (last visited Oct. 5, 2023), <https://www.att.com/support/article/local-long-distance/KM1065396/>.

As explained in the Introduction, the public convenience and necessity will not be impaired by the grandfathering of these services. The demand for this Affected Service is very low, and new customer orders for the Affected Service have virtually disappeared. The four active customers of this Affected Service will not be losing service with this filing, and prospective customers have many alternative services to choose from (as explained above at pages 13-15).

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

Customer notices were sent via U.S. Mail on October 30, 2023.³⁶ 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.³⁷

Regulatory Classification of Carrier:

AT&T offers the Affected Service 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.

³⁶ An example notice is attached at Exhibit 2. Exhibit 2 is a representative example of the notice sent to subscribers of RCF in the Affected Service Area.

³⁷ 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 Service. AT&T respectfully requests the Commission approve its Section 63.71 Application to grandfather services.

By: /s/ Brett Farley

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Customer Data for Affected Service

Data as of 10/25/2023

Wire Center (CLLI)	State	AT&T Remote Call Forwarding Service (RCF) — Circuit Count
Sugarloaf Key (SGKYFLMA)	FL	1
Nashville (NSVLTNAA)	TN	1
Cockrill Bend (NSVLTNCD)	TN	2
Troy (TROYTNMT)	TN	2
Total		6¹

¹ This total figure represents distinct circuit counts of RCF service. Because a single customer may order multiple RCF circuits, the total “circuit count” figure exceeds the total number of unique customers in the Affected Service Area. Across the Affected Service Area, there are only *four* unique RCF customers.

Exhibit 2



October 30, 2023

[Redacted]



**Important Notice Regarding Remote Call Forwarding Service
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 your Remote Call Forwarding Service in certain AT&T wire centers. Our records indicate that you currently purchase Remote Call Forwarding Service within at least one of the AT&T wire centers impacted by these changes.¹

Remote Call Forwarding Service is a service whereby incoming calls to the Remote Call Forwarding Service telephone number are automatically forwarded by the Company's central office equipment to another number designated by the customer.

Effective on or after December 31, 2023, pending regulatory approval, Remote Call Forwarding Service 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.**

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

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

(Over)

¹ Here is a full list of AT&T wire centers affected by this notice: **Florida:** Sugarloaf Key (SGKYFLMA); **Tennessee:** Nashville (NSVLTNAA), Cockrill Bend (NSVLTNCD), Troy (TROYTNMT). In these locations, Remote Call Forwarding Service is provided by BellSouth Telecommunications, LLC, d/b/a AT&T Florida and AT&T Tennessee.

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 Florida and AT&T Tennessee. 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.

Service Addresses in Areas Impacted by this Notice:

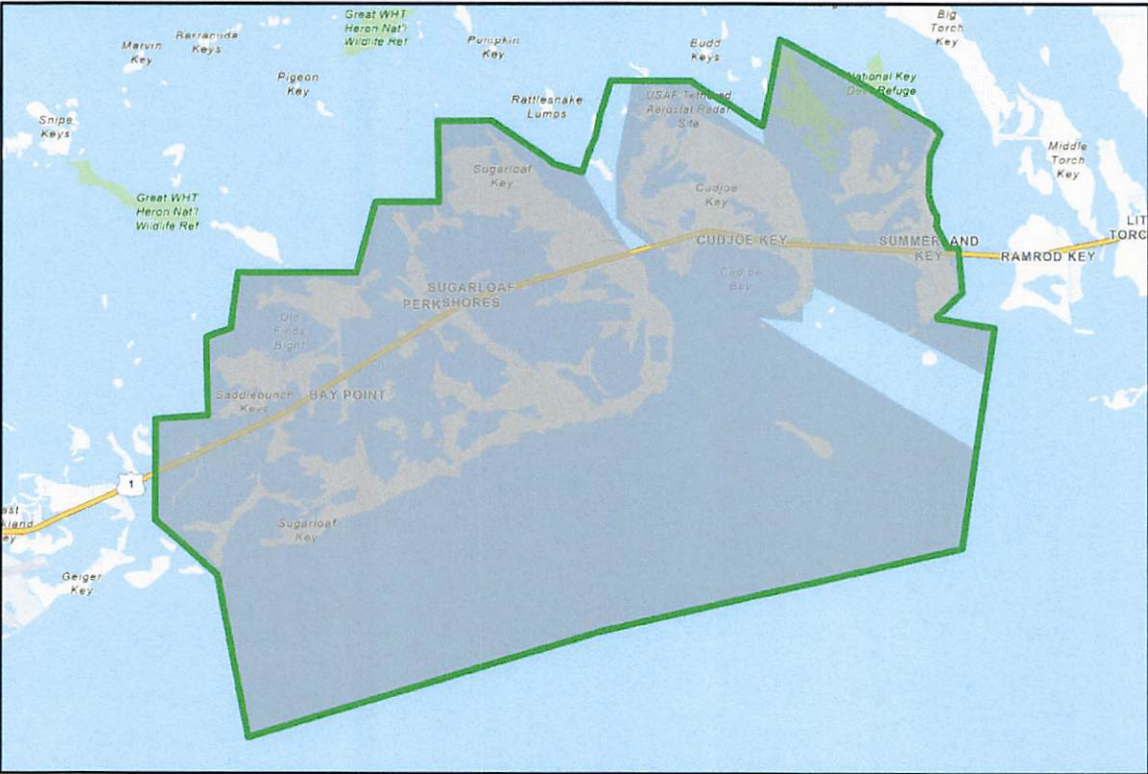
SERVICE ADDRESS	SERVICE CITY	SERVICE STATE	SERVICE ZIP
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Exhibit 3

SUGARLOAF WIRE CENTER, FL (SGKYFLMA)

As of 25 OCT 2023

Service	AT&T Remote Call Forwarding Service (RCF)
Number of Circuits	1



Center: 81°32'W 24°37'35"N



Exhibit 4

AIRPORT AUTHORITY WIRE CENTER, TN (NSVLTNAA)

As of 25 OCT 2023

Service	AT&T Remote Call Forwarding Service (RCF)
Number of Circuits	1



Center: 86°40'8"W 36°7'50"N

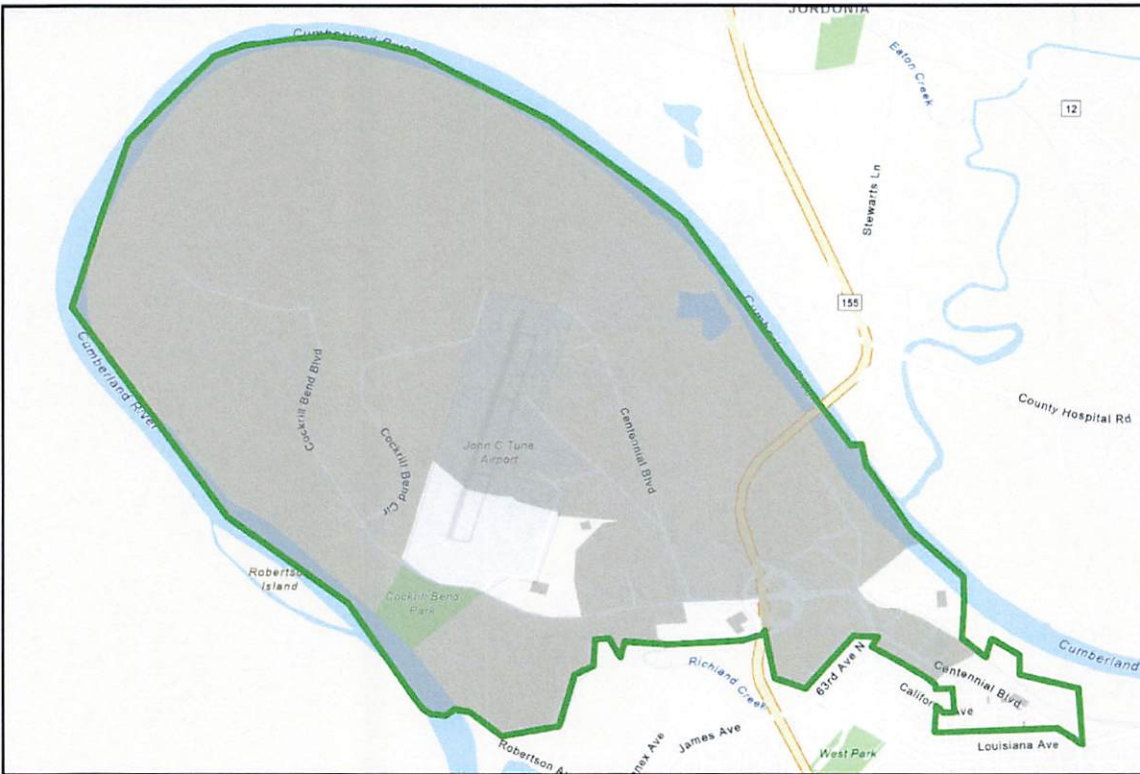


Exhibit 5

COCKRILL BEND WIRE CENTER, TN (NSVLTNCD)

As of 25 OCT 2023

Service	AT&T Remote Call Forwarding Service (RCF)
Number of Circuits	2



Center: 86°52'51"W 36°11'4"N

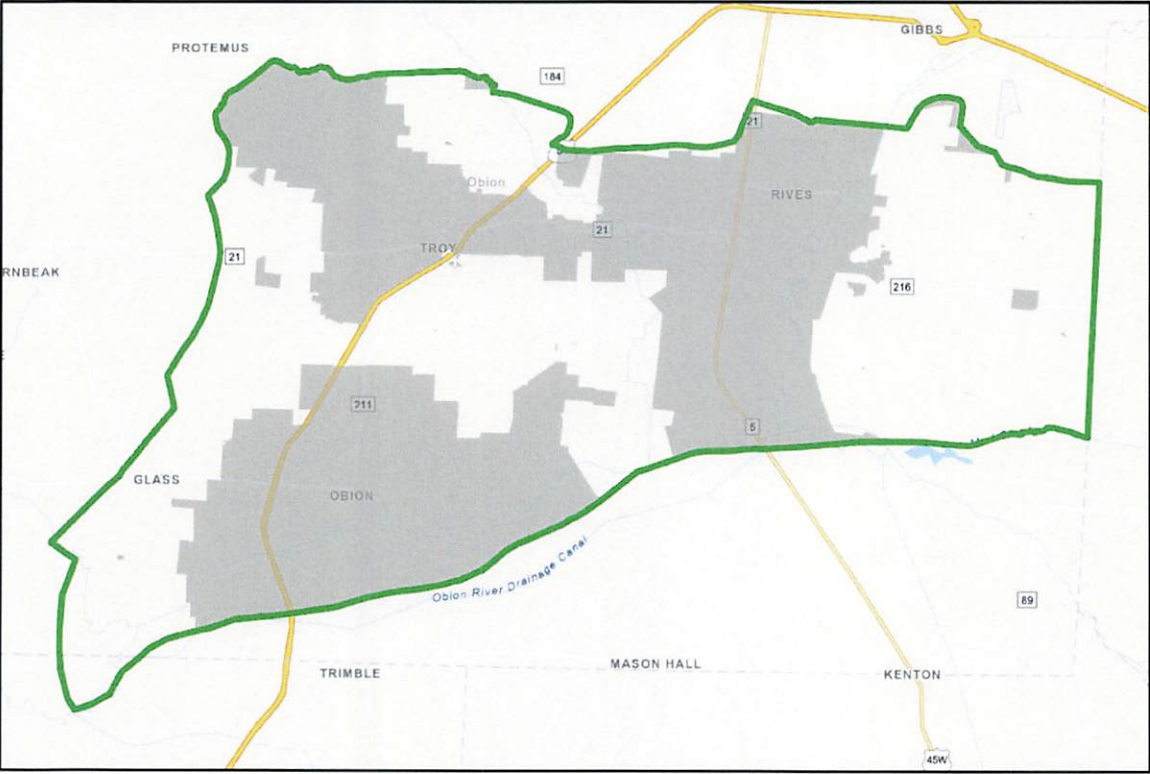


Exhibit 6

TROY WIRE CENTER, TN (TROYTNMT)

As of 25 OCT 2023

Service	AT&T Remote Call Forwarding Service (RCF)
Number of Circuits	2



Center: 89°7'12"W 36°17'39"N



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

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The Capitol
Tallahassee, FL 32399

Office of the Governor
Tennessee State Capitol
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Tennessee Regulatory
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Department of Defense
Chief Information Officer
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Washington, D.C. 20301