

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Section 63.63 Application of	)	
AT&T Corp.	)	
Pacific Bell Telephone Company	)	
SBC Long Distance, LLC	)	File No.
Teleport Communications America, LLC	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, As Amended,	)	
To Discontinue the Provision of Service	)	

**SECTION 63.63 APPLICATION OF AT&T**

AT&T Services, Inc. on behalf of its affiliates AT&T Corp., Pacific Bell Telephone Company d/b/a AT&T California, SBC Long Distance, LLC d/b/a AT&T Long Distance and Teleport Communications America, LLC, collectively referenced herein as “AT&T”, seeks emergency authorization under Section 214(a) of the Communications Act, as amended (“the Act”), 47 U.S.C. § 214, and Section 63.63 of the Federal Communications Commission’s (“Commission”) rules, to suspend AT&T’s interstate telecommunications services until services can be restored.

As required by Section 63.63(a) of the Commission’s rules, AT&T provides the following information:

**(1) The effective date of such discontinuance, reduction, or impairment, and the identification of the service area affected;**

AT&T’s services were discontinued or impacted starting Thursday, November 8, 2018 through November 25, 2018 as the Camp Road Fire (“the Fire”) spread across Butte county in Northern California effecting 4 AT&T Wire Centers.

**(2) The nature and estimated duration of the conditions causing the discontinuance, reduction, or impairment;**

On Thursday, November 8, 2018, a fire was reported by a Pacific Gas and Electric Company (PG&E) Rock Creek Powerhouse worker at 6:33 a.m. PST as having been told by an employee there was a fire burning under power lines near Pulga, California.<sup>1</sup> PG&E later reported that power lines were down in the area.<sup>2</sup> Within an hour the Butte County Sheriff's Office began a sequence of ordered evacuations of Paradise and other communities beginning with the community of Pulga followed by Concow<sup>3</sup> and Concow and the town of Paradise were destroyed within the first six hours of the Fire, losing an estimated 95 percent of their buildings.<sup>4</sup> On November 8, 2018 Governor Brown proclaimed a State of Emergency for Butte County.

When the Fire reached 100 percent containment on November 25, 2018, there were at least 86 civilian fatalities and the Fire covered an area of 153,336 acres and destroyed 18,804 structures, with most of the damage occurring within the first four hours.<sup>5</sup>

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<sup>1</sup> Trinidad, Anna (December 11, 2018). "911 Camp Fire calls reveal confusing and chaotic moments" (Wildfires). KTVU.

<sup>2</sup> "PG&E power lines may have sparked deadly Camp Fire, according to radio transmissions." *The San Jose Mercury News*. November 9, 2018.

<sup>3</sup> "Camp Fire Timeline of Terror: The evacuation of Butte County's Paradise from beginning to end." ABC7 News, 12/8/2018. Last accessed 12/15/2018.

<sup>4</sup> Wright, Pam (November 11, 2018). "At Least 23 Dead in Wildfire That Destroyed Northern California Town and Is Now the Most Destructive Fire in California History." The Weather Channel.

<sup>5</sup> CNBC (2018-11-25). "Deadly California wildfire now 100% contained after scorching 154,000 acres."

AT&T has 4 Central Offices (COs) in Butte County that were affected by the fire. All 4 COs had Distribution Areas (DAs) within the fire perimeter, which includes 137 DAs. After assessing these 137 Distribution areas (DA) in the field, 26 DAs were cleared as having no damage to our facilities, and 111 DAs incurred damage requiring more complex restoration plans. AT&T's Outside Plant Construction and Engineering personnel remain on sight and continue their work to restore service in the remaining 111 DAs.<sup>6</sup>

**(3) The facts showing that such conditions could not reasonably have been foreseen by the carrier in sufficient time to prevent such discontinuance, reduction, or impairment;**

The National Weather Service had issued a red flag warning for most of Northern California's interior and PG&E notified customers for two days before Nov. 8 that it might shut down power due to a forecast of high winds and low humidity, ultimately, PG&E did not shut down transmission lines.<sup>7</sup>

Investigators believe that the failure of a badly maintained steel hook holding up a high voltage line was a key cause of the fire.<sup>8</sup> A PG&E report to CPUC on December 11,

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<sup>6</sup> In the event of disasters that prompt the triggering of a disaster recovery plan, the Commission granted AT&T a limited waiver (of up to 180 days) of the advanced notification and waiting period requirements contained in its network disclosure rules (47 C.F.R. §§ 51.325-335) so as to allow AT&T to concentrate on restoration efforts. *See Petition of BellSouth Corporation for Special Temporary Authority and Waiver to Support Disaster Planning and Response, Order*, 21 FCC Rcd 6518 (2006). AT&T has been undertaking emergency restoral activities pursuant to this waiver. Once restoral assessments are completed, AT&T will file the relevant network change notifications associated with network changes that were a direct result of damage to the AT&T network infrastructure caused by the fires.

<sup>7</sup> Cal Fire (November 7, 2018). "CAL FIRE on Twitter." *Red Flag*

<sup>8</sup> Van Derbeken, Jaxon (December 5, 2018). "Hook on PG&E Tower Eyed as Cause of Deadly Camp Fire." *NBC Bay Area*.

2018 said that “it had found a hook designed to hold up power lines on the tower was broken before the fire, and that the pieces showed wear.”<sup>9</sup>

**(4) A description of the services involved;**

AT&T provides numerous residential and business interstate voice, private line, data and video services in this area.<sup>10</sup>

**(5) The nature of service which will be available or substituted;**

AT&T plans to restore services to all areas it served before the Fire. AT&T is deploying a variety of technologies and configurations in an effort to restore services in an expedited fashion, and is concurrently deploying long-term restoral solutions. AT&T will update the Commission, as needed, if it determines that it will discontinue offering any of its existing services.

**(6) The effect upon rates to any person in the community;**

AT&T is unaware of any effect this suspension may have upon rates to any person in the community.

**(7) The efforts made and to be made by applicant to restore the original service or establish comparable service as expeditiously as possible.**

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<sup>9</sup> Thomas Peele (December 14, 2018). “New rules planned for power shutoffs: State regulators approve toughening policy governing when utilities should turn off electricity in high winds.” *San Jose Mercury News. Bay Area News Group*. p. A1

<sup>10</sup> See AT&T Corp. Service Publications: AT&T Corp. Tariff F.C.C. No. 2 (Access Services), AT&T Corp. Tariff F.C.C. No. 4 (Business Telecommunications Services), AT&T Business Service Guide, AT&T F.C.C. Tariff No. 3 (AT&T Consumer Services), AT&T Interstate Consumer Service Guides; AT&T California Service Publications: Tariff F.C.C. No. 1 – Access Services, Tariff F.C.C. No. 2 – Special Construction, AT&T Interstate Access Guidebook, AT&T Interstate/IntraLATA Toll Services Guidebook, AT&T Switched Ethernet Service Guide; SBC Long Distance, LLC Service Publications: Tariff F.C.C. No. 18, Tariff F.C.C. No. 19, Voice Product Reference and Pricing Guidebook for Interexchange, Interstate and International Services, Data Product Reference and Pricing Guidebook (Interstate and International Services); Teleport Telecommunications America, LLC Service Publications: AT&T Business Service Guide, Teleport Communications Group Operating Companies Tariff, F.C.C. Tariff No. 2 (Access Services).

AT&T is restoring its facilities in the areas impacted by the Fire and related events based on location and/or customer access. AT&T has replaced and/or repaired (where possible) existing facilities that served structures that were salvageable.

**Conclusion:**

AT&T respectfully requests that the Commission grant AT&T's Section 63.63 Application to suspend AT&T's interstate services where its facilities were damaged in California until these facilities can be rebuilt and services restored as discussed above.

Respectfully submitted,

By: /s/ Terri L. Hoskins

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David Lawson

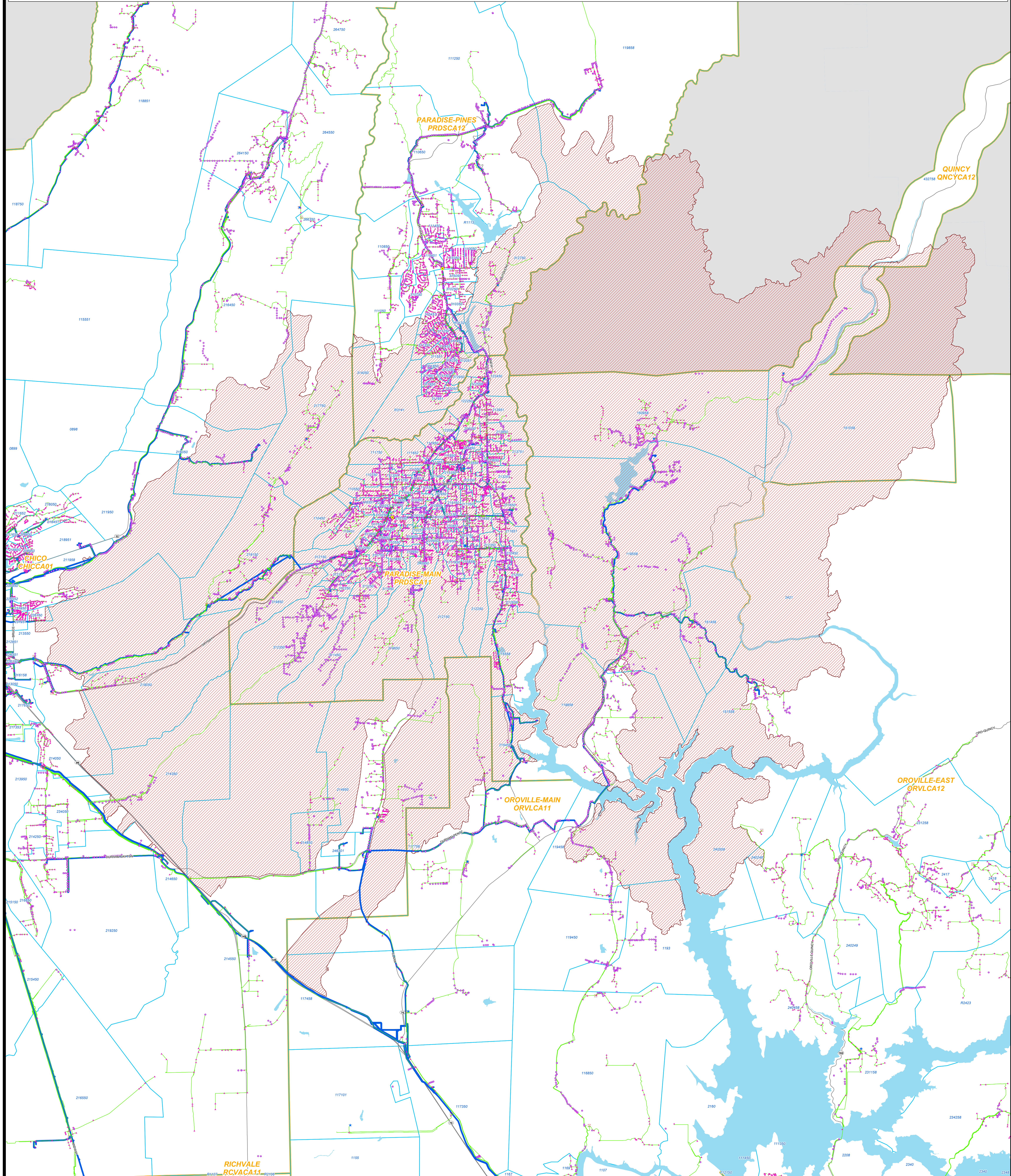
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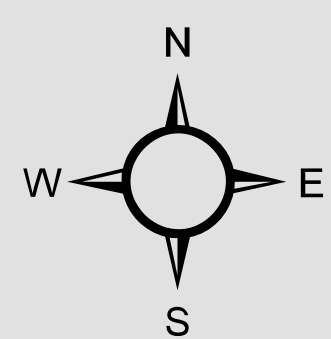
January 10, 2019



# CAMP FIRE - NOVEMBER 15, 2018 (9:15 AM)



- LEGEND**
- Copper Paths
  - Fiber Paths
  - SAI
  - Distribution Terminal
  - Remote Terminal
  - Pole
  - Central Office
  - AT&T Wirecenter
  - Distribution Area
  - Fire Perimeter



0 2,000 4,000 6,000 8,000 Feet

Coordinate System:  
UTM Zone 10  
GCS\_NAD\_1983  
Date Created: 11/15/2018

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