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October 15, 2019  
**Via ECFS Filing**

Talk America Services, LLC  
10802 Executive Center Drive Benton Building Suite 300  
Little Rock, Arkansas 72211

FRN: 0023997349  
Secretary, Federal Communications Commission  
Washington, DC 20554  
ATTN: Wireline Competition Bureau

**RE: Talk America Services, LLC  
Application to Discontinue Service**

Dear Ms. Dortch:

Enclosed for filing please find the Application to Discontinue Service submitted on behalf of Talk America Services, LLC. This filing is made pursuant to Title 47, Section 63.71 to notify the Commission of the Company's intent to discontinue the provision of exchange access and interstate long-distance services to all residential customers in the Commonwealth of Pennsylvania.

A copy of this filing has been provided to the Service List provided as Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [Sthomas@inteserra.com](mailto:Sthomas@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas  
Consultant

cc: Talk America - Talk America Services  
tms: Via ECFS

ST/cc

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

In the Matter of )  
Section 63.71 Application of )  
Talk America Services, LLC )  
to Discontinue Services )

File No. \_\_\_\_\_

**Section 63.71 Application of Talk America Services, LLC**

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of exchange access and/or interstate long distance services in the Commonwealth of Pennsylvania. This proposed discontinuance will affect approximately 1,741 existing customers.<sup>1,2</sup>

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

*1. Name and corporate headquarters address of Carrier*

Talk America Services, LLC  
10802 Executive Center Drive  
Benton Building, Suite 300  
Little Rock, AR 72211

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<sup>1</sup> Subject to regulatory approval, 70 additional Pennsylvania customers, who are served in a Multi-Dwelling Unit, will be transferred to Windstream D&E Systems, Inc., a subsidiary of Windstream Services, LLC, on or around the same time that Talk America Services proposes to discontinue services to its remaining Pennsylvania customer base via the instant Application. That customer base transfer will be the subject of a separate joint application for assignment of assets to be filed with the Commission.

<sup>2</sup> Talk America Services also intends to disconnect local exchange service (dial tone and local usage), digital subscriber line ("DSL") internet access, and intrastate long-distance services to some of the affected customers. These services are not subject to the FCC's Section 214 discontinuance rules and are, therefore, not included as part of this request for authorization. However, customers are being notified regarding all of the services that are to be discontinued.

2. *Correspondence concerning this Application should be sent to:*

Sharon Thomas  
Consultant to Talk America Services, LLC  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [stthomas@inteserra.com](mailto:stthomas@inteserra.com)

3. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the services that are the subject of this Application on or about December 5, 2019, pending required federal and state regulatory approval of the discontinuance.

4. *Points of Geographic Areas of Service Affected:*

Talk America Services proposes to discontinue all of its telecommunications services in the Commonwealth of Pennsylvania. Services provided to existing customers will be discontinued and services will no longer be offered to new customers following the proposed discontinuance.

5. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

The table below identifies the types of telecommunications services and the number of customers impacted by the proposed discontinuance of service.

State	Local Exchange/Exchange Access Lines and Intrastate/Interstate Long Distance (Bundled)	Intrastate and Interstate Long Distance Only	Total Affected Customers
Pennsylvania	1,401	340	1,741

The services subject to the FCC's jurisdiction that are the subject of this request for authorization are exchange access and interstate long distance. Talk America Services relies exclusively on an underlying provider to provide services in the affected states. The underlying provider has notified Talk America Services that it will no longer provide or support these services. Consequently, Talk America Services must discontinue service to the affected customers.

As described below, Talk America Services is providing all affected customers with ample notice of

the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

6. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice was provided via 1<sup>st</sup> class U.S. mail to all affected customers in three batches mailed on the following dates: September 30, 2019, October 7, 2019, and October 14, 2019. The notice is attached as Exhibit A.

A copy of this Application is being sent to the state regulatory commission and governor's office in Pennsylvania, as well as to the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

**Conclusion**

Talk America Services, LLC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31<sup>st</sup> day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 15<sup>th</sup> day of October 2019.

By: /s/ Allison W. Taylor

Allison W. Taylor  
Vice President, Operations  
Talk America Services, LLC

Sharon Thomas, Consultant to  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [stthomas@inteserra.com](mailto:stthomas@inteserra.com)

**Exhibit A**

**Customer Notice**



October 14, 2019

Customer Name

Customer Address

City, State Zip

***URGENT: Your telephone services will be impacted unless you take action!***

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the state of Pennsylvania on or after December 5, 2019, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

It is important that you migrate the services you are receiving from Talk America Services to an alternative provider **before December 5, 2019** to avoid a **permanent disruption of your telephone services**. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers before December 5, 2019. Alternative providers in your area are available in your local phone book or through an online search.

A filing is being made with the FCC for approval of this discontinuance of service. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the \$63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

For additional assistance or questions, contact Talk America Services' customer service at 1-800-962-4772 or [customercare@talkamericaservices.com](mailto:customercare@talkamericaservices.com) or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,

Talk America Services, LLC

## **Exhibit B – Service List**

Ms. Rosemary Chiavetta, Commission Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Governor Tom Wolf  
Governor of Pennsylvania  
Room 225  
Main Capitol Building  
Harrisburg, PA 17120

U.S. Department of Defense  
Pentagon  
Attn. Special Assistant for Telecom.  
Washington, DC 20301

**CERTIFICATE OF SERVICE**

STATE OF FLORIDA        )

COUNTY OF ORANGE       )

On this date, October 15, 2019, the foregoing Section 63.71 Application was sent by U.S. Mail postage prepaid to the service list contained in Exhibit B.

/s/Keith Rice

For Shipping Department  
Inteserra Consulting Group, Inc.