

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter Of)
)
Section 63.71 Application of)
)
Windstream Services, LLC) WC Docket No. _____
)
For Authority Pursuant to Section 214 of)
the Communications Act of 1934 to)
Discontinue the Provision of Certain Services)

SECTION 63.71 APPLICATION OF WINDSTREAM SERVICES, LLC

Windstream Services, LLC¹ ("Windstream"), on behalf of its competitive local exchange carrier affiliates, Network Telephone, LLC and Talk America, LLC (collectively "Windstream"), through its undersigned counsel and pursuant to Section 214 of the Communications Act of 1934, 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, hereby files this Application to discontinue the provision of certain services in the markets specified below. In support of this Application, Windstream submits the following information:

1. Information listed in 47 C.F.R. § 63.71(a)(1)-(4) (47 C.F.R. § 63.71(b)(2)):

a. Name and Address of Carrier (47 C.F.R. § 63.71(a)(1)-(4), (b)(2)):

Network Telephone, LLC²
Talk America, LLC³
4001 North Rodney Parham Rd.
Little Rock, AR 72212

¹ FRN 0014400220

² FRN 0004071262

³ FRN 0004319430

b. Date of Planned Discontinuance (47 C.F.R. § 63.71(a)(2), (b)(2)):

Windstream plans to discontinue the Affected Services (see sub-paragraph d, below) on or about December 30, 2019.

c. Point of Geographic Areas of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

Affected Services will be discontinued in Mobile, AL; and, in Lafayette, Lake Charles, Monroe, New Iberia, Opelousas, Ruston, Shreveport and West Monroe, LA; and, in Detroit, MI; and, in Columbus, New Albany and Tupelo, MS.

d. Brief Description of the Type of Service to be Affected (47 C.F.R. § 63.71(a)(4), (b)(2)):

The services to be affected are POTS, DSL and Integrated Voice and Data services ("the Affected Services") which are currently being offered via collocations that are subject to network consolidation.

2. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

On October 8, 2019, Windstream sent by First Class U.S. Mail notice to all affected customers of the planned discontinuance. A copy of such notice is attached hereto as Attachment 1, which is compliant with, among other things, Section 63.71(a)(5) of the Commission's rules, 47 C.F.R. § 63.71(a)(5).

3. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (a)(4)):

Windstream is nondominant with respect to the services that it proposes to discontinue.

4. Service:

In accordance with Section 63.71(a)(1) of the Commission's rules, 47 C.F.R. § 63.71(a)(1), Windstream is submitting a copy of this Application by First Class U.S. Mail to the Alabama Public Service Commission and to the Office of Alabama Governor, Kay Ivey; to the Louisiana Public Service Commission and to the Office of Louisiana Governor, John Bel Edwards; to the Michigan Public Service Commission and to the Office of Michigan Governor Gretchen Witmer;

and to the Mississippi Public Service Commission and to the Office of Mississippi Governor, Phil Bryant; and also to the Secretary of Defense (at the address given in 47 C.F.R. § 63.71(a)).

5. Additional Questions Regarding This Application May be Addressed to the Undersigned.

6. Circumstances of Discontinuance.

Over the years, a number of CLECs have become Windstream affiliates and operate as part of the Windstream family of companies. Some of these Windstream CLECs operate in overlapping markets with duplicative collocation facilities. To improve operational efficiencies, Windstream is in the process of consolidating various collocation facilities across its network. Windstream will continue to serve its customers in each of these markets and geographic coverage will not be affected; however, the menu of services available to customers served through the consolidated collocations will change. The Affected Services are provided on end-of-life platforms that will be decommissioned in the collocations that are being consolidated. A total of twenty-seven (27) business customers (no residential customers) will be affected. Windstream will assist affected customers, providing them options for migrating to alternative Windstream services or to move services to another carrier.

These customers will not be unduly harmed because they are being provided ample notice of the discontinuance and are being offered alternative services to the ones being discontinued. Furthermore, customers have comparable options from other providers serving these locations.

7. Conclusion

Windstream believes that the proposed discontinuance is reasonable and necessary. As outlined herein, Windstream will take reasonable steps to assure that the discontinuance of the Affected Services is not unduly disruptive to the present or future public convenience and necessity. Accordingly, Windstream respectfully requests that the Commission permit it to

discontinue the provision of the Affected Services to customers in the affected locations pursuant to Section 63.71.

Respectfully submitted

A handwritten signature in black ink, reading "Edward J. Cadieux". The signature is written in a cursive, flowing style.

Edward J. Cadieux
Regulatory Counsel
Windstream Services, LLC
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Little Rock, AR 72112
(314) 249-0216
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October 16, 2019

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application was served this 16th day of October, 2019, by mailing true and correct copies thereof, postage prepaid, to the following persons to the addresses listed below.

Secretary of Defense
Attn: Special Assistance for Telecommunications
Pentagon
Washington, DC 20301

Mr. Walter L. Thomas, Jr. Secretary
Alabama Public Service Commission
100 Union Street, Suite 850
Montgomery, AL 36104

Office of Governor, Kay Ivey
600 Dexter Ave
Montgomery, AL 36130

Louisiana Public Service Commission
Eve Kahao Gonzalez, Executive Secretary
PO Box 91154
602 North Fifth Street
Baton Rouge, LA 70821-9154

Office of Governor John Bel Edwards
P. O. Box 94004
Baton Rouge, LA 70804-9004

Mississippi Public Service Commission
Brian Ray, Executive Secretary - PSC
501 North West Street
Woolfolk State Office Bldg.
Jackson, MS 39201-1174

Office of Governor Phil Bryant
P.O. Box 139
Jackson, MS 39205

Michigan Public Service Commission
Michelle Conarton, Executive Secretary
9 West Saginaw Highway
Lansing, MI 48909

Office of Governor Gretchen Witmer
P.O. Box 30013
Lansing, MI 48909

A handwritten signature in black ink, reading "Edward J. Cadieux". The signature is written in a cursive, flowing style with a horizontal line extending from the end of the name.

Edward J. Cadieux