

**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 between December 4, 2017 and January 26, 2018 as three fires spread across 5 counties in Southern California and major mud slides followed in the burn areas.

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

As noted above, on Monday, December 4, 2017, the Thomas Fire originated as two separate fires, with the first fire igniting on December 4th, in Santa Paula Canyon, near Thomas Aquinas College. The second fire started shortly thereafter nearly 4 miles north in Upper Ojai, at the top of Koenigstein Road.<sup>1</sup> The fires soon merged, which caused major damage and loss of life in five counties in Southern California: Los Angeles, Riverside, San Diego, Santa Barbara, and Ventura Counties. It is estimated that 315,000 acres burned, which destroyed or damaged at least 1300 structures, and killed 2 people. On December 5th, Governor Jerry Brown declared a state of emergency for Ventura and Los Angeles Counties, followed by San Diego County on December 7th.<sup>2</sup> On January 2, 2018, President Donald J. Trump approved a major disaster declaration for California.<sup>3</sup>

In addition, on January 8, 2018, a storm system moved into southern California, prompting mandatory evacuations in parts of Los Angeles, Santa Barbara, and Ventura counties over potential mudslides in areas affected by the wildfires. The storm intensified on the following day, with two to four inches of rain falling over the two-day period, and

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<sup>1</sup> *Thomas Fire Had Two Origins*, Stolz, The Santa Barbara Independent (December 22, 2017). <https://www.independent.com/news/2017/dec/22/thomas-fire-had-two-origins>, (last checked Feb. 2, 2018).

<sup>2</sup> *State of emergency declared for Los Angeles County as Creek, Rye fires continue to burn*, Yee, The Mercury News (December 6, 2017) <https://www.mercurynews.com/2017/12/05/state-of-emergency-declared-for-los-angeles-county-as-creek-rye-fires-continue-to-burn/>, (last checked Feb. 2, 2018).

<sup>3</sup> See FEMA, California Fires (DR-4353), <https://www.fema.gov/news-release/2018/01/02/president-donald-j-trump-approves-major-disaster-declaration-california>, (last checked Feb. 2, 2018) See also FEMA DR-4353 Map, Attachment A.

causing several major mudflows.<sup>4</sup> The mudslides added delay to AT&T's restoration of the areas impacted by the fires.

AT&T has 5 Central Offices (COs) in the counties affected by the fires. All 5 COs had areas within them that were burned, which includes 80 Distribution Areas (DAs). After assessing these 80 Distribution areas (DAs) in the field, 42 DAs were cleared as having no damage to our facilities; 28 DAs were repaired and restored; and 10 DAs incurred damage requiring more complex restoration plans. Of those 10 DAs, service has been restored in 7 DAs. AT&T's Outside Plant Construction and Engineering personnel remain on site and continue their work to restore service in the remaining 3 DAs.<sup>5</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;**

As noted above, the discontinuance of service was caused by wildfires with as yet unknown origins.

**(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>6</sup>

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<sup>4</sup> *1st Major Storm of the Year Brings Rain to SoCal, Triggers Evacuations Amid Concerns of Mudslides in Burn Areas*, Friel, Lyster, Myers, Pascucci, Quednow, KTLA 5 News (January 8, 2018) <http://ktla.com/2018/01/08/first-significant-storm-of-the-year-brings-concern-for-debris-flow-in-recent-socal-burn-areas/> (last checked Feb. 2, 2018).

<sup>5</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>6</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.

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

AT&T plans to restore services to all areas it served before the wildfires. 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.**

AT&T is restoring its facilities in the areas impacted by the wildfires 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.

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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).

Respectfully submitted,

By: /s/ Terri L. Hoskins

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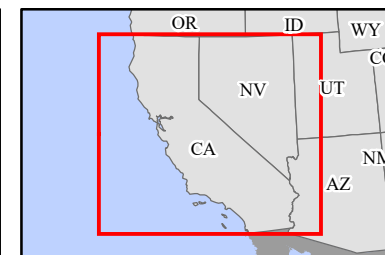
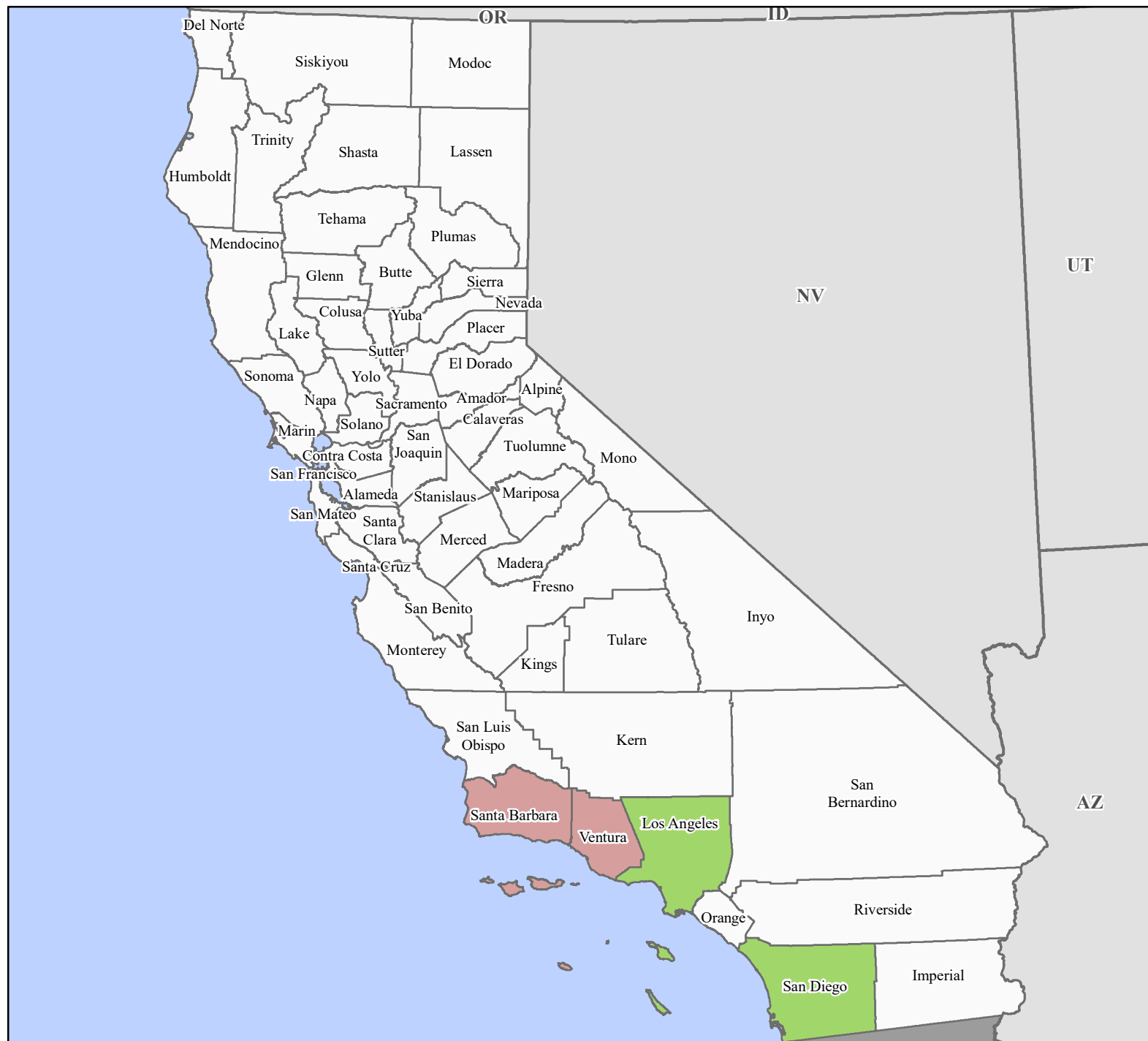
February 2, 2018

# ATTACHMENT A

# FEMA-4353-DR, California Disaster Declaration as of 01/15/2018



FEMA



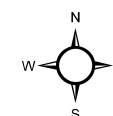
## Data Layer/Map Description:

The types of assistance that have been designated for selected areas in the State of California.

All designated areas in the State of California are eligible to apply for assistance under the Hazard Mitigation Grant Program.

## Designated Counties

- No Designation
- Individual Assistance
- Individual Assistance and Public Assistance



0 30 60 90 120  
Miles

## Data Sources:

FEMA, ESRI;  
Initial Declaration: 01/02/2018  
Disaster Federal Registry Notice:  
Amendment #2 01/15/2018  
Datum: North American 1983  
Projection: Lambert Conformal Conic