



Victoria Carter-Hall  
Manager - Federal Regulatory

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February 5, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Public Notice of Copper Retirement Under Rule 51.332**

Dear Ms. Dortch:

Pursuant to the notification requirements in §51.325 -- §51.335 of the Commission's rules, AT&T hereby submits this Public Notice of Copper Retirement Under Rule 51.332 (ATT20180125C.1). A description of the network change is attached, and is also available online.

<u>NUMBER</u>	<u>TYPE OF CHANGES PLANNED</u>	<u>LOCATION OF CHANGE</u>
ATT20180125C.1	<p>On September 10, 2017, Florida Keys suffered severe damage when Hurricane Irma made landfall as a category 4 hurricane. This was the strongest hurricane to hit the U.S. in more than a decade. A 15 foot storm surge caused severe flooding in surrounding counties. The Hurricane destroyed many facilities in its path such as buildings, utility poles, aerial cable (both electric and telecommunications), and street signs. The storm surge caused severe flooding in surrounding low-land areas and caused damage to AT&amp;T equipment that remained under salt water for many days.</p> <p>On September 10, 2017, President Trump declared Florida a major disaster area. A total of 48 distribution areas (DAs) were directly impacted. An estimated 10,000 residents were homeless after Hurricane Irma pass through Florida Keys. Immediately after Hurricane Irma struck Florida, AT&amp;T activated its Network Disaster Recovery Team in Florida and began deploying portable cell sites, mobile command centers, hazmat response vehicles and charging stations.</p> <p>On November 10, 2017, AT&amp;T filed an application for emergency authorization under Section 214(a) of the Communications Act and Section 63.63 of the Federal Communications Commission's rules to suspend AT&amp;T's interstate telecommunications services until services can be rebuilt.</p> <p>As a result of Hurricane Irma, AT&amp;T Florida determined that the copper facilities comprising the below - Distribution Areas (DAs) in Sugarloaf Key, Florida and Big Pine Key, Florida wire centers suffered severe and/or irreparable damage. Although AT&amp;T Florida restored service to several customers on temporary copper facilities, AT&amp;T has or will replace the copper distribution plant and service wires (Drops) in these DAs with a permanent</p>	<p>Sugarloaf Key, FL</p> <p>Big Pine Key, FL</p>

	<p><b>network solution known as Gigabit Passive Optical Network (GPON)/Fiber to the Premises (FTTP).</b></p> <p><b>BellSouth Telecommunications, LLC d/b/a AT&amp;T Florida, replaced the SAI and copper facilities in the following distribution areas with GPON/FTTP facilities: 110503, 110506, 110510, 111502, 111516, 111522, 111902, 111903, 120306, 120310, 120331, 120335, 210103, 210106, 220308, 220310, 220312, 220314, and 230105 in the Sugarloaf wire center SGKYFLMA, 19921 Overseas Hwy, Sugarloaf Key FL 33042.</b></p> <p><b>Distribution areas: 110305, 110306, 110310, 110316, 110318, 110705, 110706, 111906, 111909, 211320, 211336, 211340, 212306, 220102, 220106, 310203, 310210, 310214, 310216, 310224, 310307, 310910, 310924, 311502, 311906, 312902, 312903, 313302, and 313303 in the Big Pine Key wire center BGPIFLMA, 30769 Avenue A, Big Pine Key FL 33043; and 461333 in the Arch Creek wire center NDADFLAC, 2100 NE 164th St, North Miami Beach FL 33162</b></p>	
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This copper retirement notice is also available at: <https://ebiznet.att.com/networkreg/>

Should you have any questions, please do not hesitate to contact me at (202) 457-2164.

Sincerely,



Attachments

cc: Carmell Weathers  
Florida Public Service Commission  
Office of the Governor of Florida  
Department of Defense Chief Information Officer

# PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.332

**Network Disclosure  
Number:**

**ATT20180125C.1**

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**Issue Date: 2/5/2018**

**Carrier's Name:**

BellSouth Telecommunications, LLC d/b/a AT&T  
Florida

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**Carrier's Address:**

1120 20<sup>th</sup> Street NW, Suite 1000, Washington, DC 20036

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**Contact:**

Your Account Manager or Service Representative

**Technical Issues**

Terry McKenzie  
2800 W 10Th St  
Sioux Falls, SD 57104  
(605) 530-9456  
[tm921b@att.com](mailto:tm921b@att.com)

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**Public Notice:** can be obtained on the Internet at:  
<https://ebiznet.att.com/networkreg/>

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**Implementation Date: On or after September, 2017**

**Description of Network Changes Planned:**

On September 10, 2017, Florida Keys suffered severe damage when Hurricane Irma made landfall as a category 4 hurricane. This was the strongest hurricane to hit the U.S. in more than a decade. A 15 feet storm surge caused severe flooding in surrounding counties. The Hurricane destroyed many facilities in its path such as buildings, utility poles, aerial cable (both electric and telecommunications), and street signs. The storm surge caused severe flooding in surrounding low-land areas and caused damage to AT&T equipment that remained under salt water for many days.

On September 10, 2017, President Trump declared Florida a major disaster area. A total of 48 distribution areas (DAs) were directly impacted. An estimated 10,000 residents were homeless after Hurricane Irma pass through Florida Keys. Immediately after Hurricane Irma struck Florida, AT&T activated its Network Disaster Recovery Team in Florida and began deploying portable cell sites, mobile command centers, hazmat response vehicles and charging stations.

On November 10, 2017, AT&T filed an application for emergency authorization under Section 214(a) of the Communications Act and Section 63.63 of the Federal Communications Commission's rules to suspend AT&T's interstate telecommunications services until services can be rebuilt.

As a result of Hurricane Irma, AT&T Florida determined that the copper facilities comprising the below - Distribution Areas (DAs) in Sugarloaf Key, Florida and Big Pine Key, Florida wire centers suffered severe and/or irreparable damage. Although AT&T Florida restored service to several customers on temporary copper facilities, AT&T has or will replace the copper distribution plant and service wires (Drops) in these DAs with a permanent network solution known as Gigabit Passive Optical Network (GPON)/Fiber to the Premises (FTTP).

BellSouth Telecommunications, LLC d/b/a AT&T Florida, replaced the SAI and copper facilities in the following distribution areas with GPON/FTTP facilities: 110503, 110506, 110510, 111502, 111516, 111522, 111902, 111903, 120306, 120310, 120331, 120335, 210103, 210106, 220308, 220310, 220312, 220314, and 230105 in the Sugarloaf wire center SGKYFLMA, 19921 Overseas Hwy, Sugarloaf Key FL 33042.

Distribution areas: 110305, 110306, 110310, 110316, 110318, 110705, 110706, 111906, 111909, 211320, 211336, 211340, 212306, 220102, 220106, 310203, 310210, 310214, 310216, 310224, 310307, 310910, 310924, 311502, 311906, 312902, 312903, 313302, and 313303 in the Big Pine Key wire center BGPIFLMA, 30769 Avenue A, Big Pine Key FL 33043; and 461333 in the Arch Creek wire center NDADFLAC, 2100 NE 164th St, North Miami Beach FL 33162

**Description of Reasonably Foreseeable Impact of the Planned Changes:**

After the retirement of the SAI and copper distribution facilities, AT&T Florida no longer offers services over the copper network. The copper distribution plant and copper service wires (Drops) were replaced with new fiber service wires to the NID. Currently there is some internet services available in the impacted DA's. High speed internet service is available with GPON/FTTP service. This change does not impact these services. The impacted addresses are in the embedded document.

**Description of Changes to Rates, Terms and Conditions:**

In general, replacing copper facilities will not result in changes to rates, terms, and conditions where the affected service is converted to a like-for-like service available on fiber facilities.

List of affected premises included on the NCN as an excel attachment at -

[https://ebiznet.att.com/networkreg/regulatory\\_documents/ATT20180125C.1\\_Web.doc](https://ebiznet.att.com/networkreg/regulatory_documents/ATT20180125C.1_Web.doc)

A hard copy of this list can be obtained by contacting Terry McKenzie at the address listed above.