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February 8, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 (ATT20180129C.2). 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>
ATT20180129C.2	<p>On October 8, 2017, high winds and multi-year drought conditions created the environment for wildfires of unknown origin. These conditions created a conflagration that spread, creating 21 fires, which caused major damage and loss of life in five counties of Northern California: Napa, Solano, Sonoma, Lake, and Mendocino. It is estimated that 320,000 acres burned, which destroyed or damaged at least 8,700 structures, and killed 43 people.</p> <p>On October 9, 2017, Governor Jerry Brown declared a State of Emergency for Butte, Lake, Mendocino, Nevada, Orange, Napa, Sonoma and Yuba Counties due to the wildfires. On October 10, 2017, Governor Brown declared a State of Emergency for Solano County. In addition, FEMA declared the California Wildfires (DR-4344) a Major Disaster Declaration on October 10, 2017.</p> <p>Pacific Bell Telephone Company d/b/a AT&T California activated its Network Disaster Recovery Team in California and began deploying portable cell sites, mobile command centers, hazmat response vehicles and charging stations.</p> <p>On December 7, 2017, AT&T California 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.</p> <p>As a result of the Tubbs, Nuns, and Atlas wild fires, AT&T California, determined that the copper feeder facilities to specific distribution areas were destroyed beyond repair in a portion of Santa Rosa (SNRSCA01, 516 3RD St, Santa Rosa, CA 95401) and Napa (NAPACA01, 1300 Clay St, Napa, CA 94559).</p>	<p>Santa Rosa, CA</p> <p>Napa, CA</p>

	This action will require the retirement of copper distribution plant and service wires (Drops) in Santa Rosa DA's: 142901, 143201, 143301, 141657, 390402, 560301, 540413, 540716, 520404, 580101, 580201, 590205, 593105, 592101, 593201, and R5501 and for NAPA DA's: 212650, 213050, 213350, 213951, 214250, 214350, and 214450. AT&T California has a Gigabit Passive Optical Network (GPON)/Fiber to the Premises (FTTP) platform available to serve the impacted addresses in the embedded document below.	
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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,

A handwritten signature in black ink that reads "Vietrice Carter Hall". The signature is written in a cursive style with a horizontal line at the end.

Attachments

cc: Carmell Weathers
California Public Utilities Commission
Office of the Governor of California
Department of Defense Chief Information Officer

PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.332

**Network Disclosure
Number:**

ATT20180129C.2

Issue Date: 2/8/2018

Carrier's Name:

Pacific Bell Telephone Company d/b/a AT&T California

Carrier's Address:

1120 20th Street NW, Suite 1000, Washington, DC 20036

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

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

Implementation Date: On or after October, 2017

Description of Network Changes Planned:

On October 8, 2017, high winds and multi-year drought conditions created the environment for wildfires of unknown origin. These conditions created a conflagration that spread, creating 21 fires, which caused major damage and loss of life in five counties of Northern California: Napa, Solano, Sonoma, Lake, and Mendocino. It is estimated that 320,000 acres burned, which destroyed or damaged at least 8,700 structures, and killed 43 people.

On October 9, 2017, Governor Jerry Brown declared a State of Emergency for Butte, Lake, Mendocino, Nevada, Orange, Napa, Sonoma and Yuba Counties due to the wildfires. On October 10, 2017, Governor Brown declared a State of Emergency for Solano County. In addition, FEMA declared the California Wildfires (DR-4344) a Major Disaster Declaration on October 10, 2017.

Pacific Bell Telephone Company d/b/a AT&T California activated its Network Disaster Recovery Team in California and began deploying portable cell sites, mobile command centers, hazmat response vehicles and charging stations.

On December 7, 2017, AT&T California 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 the Tubbs, Nuns, and Atlas wild fires, AT&T California, determined that the copper feeder facilities to specific distribution areas were destroyed beyond repair in a portion of Santa Rosa (SNRSCA01, 516 3RD St, Santa Rosa, CA 95401) and Napa (NAPACA01, 1300 Clay St, Napa, CA 94559).

This action will require the retirement of copper distribution plant and service wires (Drops) in Santa Rosa DA's: 142901, 143201, 143301, 141657, 390402, 560301, 540413, 540716, 520404, 580101, 580201, 590205, 593105, 592101, 593201, and R5501 and for NAPA DA's: 212650, 213050, 213350, 213951, 214250, 214350, and 214450. AT&T California has a Gigabit Passive Optical Network (GPON)/Fiber to the Premises (FTTP) platform available to serve the impacted addresses in the embedded document below.

Description of Reasonably Foreseeable Impact of the Planned Changes:

After the retirement of the DLC, SAI and FTTN facilities, AT&T California will: (1) no longer offer services over the FTTN facilities; and (2) cease maintaining the FTTN facilities. Since the FTTN platform is a copper based architecture, the copper distribution plant and copper service wires (Drops) will be/are being replaced with new fiber service wires to the NID. There are presently 5,412 living units in these distribution areas that will be affected with this transition from copper to an all FTTP network. There will be CLEC circuits impacted in this project. 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. However, the DSL internet service plan of some existing customers will not be available after the move to fiber optic technology. With fiber optic technology, other internet service plans with the same features and functions are available and rates vary by speed. A higher speed service plan is available at the same or lower rate than the customer's current rate plan.

List of affected premises included on the NCN as an excel attachment at - https://ebiznet.att.com/networkreg/regulatory_documents/ATT20180129C.2_Web.doc
A hard copy of this list can be obtained by contacting Terry McKenzie at the address listed above.

¹ See FEMA, California Fires (DR-4344), https://www.fema.gov/disaster/4344?utm_source=hp_promo&utm_medium=web&utm_campaign=disaster See also FEMA DR-4344 Map, Attachment A.