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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.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>
ATT20180129C.1	<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 Nuns, Tubbs, Redwood and Sulphur wild fires, AT&T California determined that the copper feeder plant to specific distribution areas were destroyed beyond repair in portions of Sonoma (SONMCA12 17021 Cedar St. Sonoma, California 95476), Ukiah (UKIHCA12 6140 N. State St., Ukiah,</p>	<p>Ukiah, CA</p> <p>Santa Rosa, CA</p> <p>Sonoma, CA</p> <p>Lower Lake, CA</p>

	<p>California 95418), Santa Rosa (SNRSCA11 478 Los Alamos Rd. Santa Rosa, California 95409) and Lower Lake (LWLKCA11 14902 Palmer Ave. Lower Lake, California 95422).</p> <p>This action will require the retirement of the copper feeder plant in the following locations: Sonoma DA's 110550, 110750 and 410850; Ukiah DA's 430751 and 430851; Santa Rosa DA 480702; and Lower Lake DA's 830257, 830356 and 820652. The circuits will be transferred to fiber based NGDLC systems. The transfer of these circuits does not compromise the capacity of the cabinets.</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
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.1

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 can be obtained on the Internet at:

Notice: <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.

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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 Nuns, Tubbs, Redwood and Sulphur wild fires, AT&T California determined that the copper feeder plant to specific distribution areas were destroyed beyond repair in portions of Sonoma (SONMCA12 17021 Cedar St. Sonoma, California 95476), Ukiah (UKIHCA12 6140 N. State St., Ukiah, California 95418), Santa Rosa (SNRSCA11 478 Los Alamos Rd. Santa Rosa, California 95409) and Lower Lake (LWLKCA11 14902 Palmer Ave. Lower Lake, California 95422).

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Description of Reasonably Foreseeable Impact of the Planned Changes:

After the retirement of the copper feeder plant, copper feeder facilities from the Central Office will no longer be available or maintained in the affected areas. Unbundled loops are defined as compatible with Digital Loop Carrier (DLC), e.g., those defined to transport POTS-grade service, will be transferred to the DLC system without consequence. There are presently 1,173 working services affected under this notice. The impacted addresses are in the embedded document.

Description of Changes to Rates, Terms and Conditions:

In general, retiring 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 NGDLC facilities.

It should be noted that if a competitive carrier obtains an unbundled loop that has been defined to transport POTS-grade service, but then utilizes this loop to provide DSL service, AT&T will have no knowledge of the presence of DSL. In such case, AT&T has no basis or ability to notify the carrier.

List of affected premises included on the NCN as an excel attachment at - https://ebiznet.att.com/networkreg/regulatory_documents/ATT20180129C.1_Web.doc
A hard copy of this list can be obtained by contacting Terry McKenzie at the address listed above.