

October 21, 2019
Via ECFS Filing

Secretary, Federal Communications Commission
Washington, DC 20554
ATTN: Wireline Competition Bureau

RE: Talk America Services, LLC – WC Docket No. 19-258
Application to Discontinue Service – Supplemental Response to Alexander Comment

Dear Ms. Dortch:

Please accept this letter submitted on behalf of Talk America Services, LLC (“Company”) providing supplemental information in response to comments submitted in the above-referenced docket by Ms. Kristen Alexander, a Talk America Services customer. Ms. Alexander expressed concern that she would be unable to obtain an alternative landline telephone service when Talk America Services discontinues service in Delaware.

As indicated in the Company’s prior response submitted on September 30, 2019, the Company’s research into other options available to Ms. Alexander determined that Verizon offers an unbundled landline/copper basic local service in her area. Talk America Services communicated with representatives from Verizon in an effort to help Ms. Alexander find an affordable replacement for her existing service bundle. Based on our correspondence with Verizon, Ms. Alexander was not interested in the lowest-price basic service offering available from Verizon, with pricing in the \$40/month range, because that plan does not include unlimited long-distance service, which Ms. Alexander prefers. Verizon indicated that they informed Ms. Alexander that the price for an unlimited voice local/long distance service bundle is \$65.99+ taxes and fees, for a total of approximately \$85 per month.

Unfortunately, Talk America Services has no control over the service alternatives or pricing available from other providers. Nor can it control whether the marketplace will provide a bundle of services at a price point that each customer prefers to pay. Deregulation in both federal and state jurisdictions, coupled with policies that encourage wireless and broadband adoption but give limited attention to ensuring the continued availability of low-priced wireline voice services, have resulted in few alternatives for customers who prefer wireline voice-only service. Talk America Services emphasizes that it is not discontinuing the provision of services because it is choosing to do so—rather, due to the unavailability of inputs from its wholesale provider it will be legally unable to continue to provide services in the coming months. The Company is taking every effort to ensure an orderly transition for affected customers, including significant work to directly reach out to Verizon on behalf of Ms. Alexander in order to present her with available options. The Company’s above-referenced application should not be delayed or denied because of pricing and provisioning decisions by other carriers that negatively impact consumers’ ability to find specific wireline voice service alternatives at a price point that they would prefer to pay.

Talk America Services regrets the inconvenience to Ms. Alexander and other customers who it will no longer be able to serve. The company is providing as much assistance as possible to help them find and transition to alternative providers.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant