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October 22, 2019

Marlene Dortch
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: WC Docket No. 17-354; RENEWAL of SECTION 63.63 APPLICATION of AT&T

Dear Ms. Dortch:

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" filed a Section 63.63 application in the above-referenced docket on December 7, 2017 seeking emergency authorization under Section 214(a) of the Communications Act, as amended ("the Act"), 47 U.S.C. § 214, to suspend AT&T's wireline interstate telecommunications services as a result of twenty-one fires that spread across five counties in Northern California and damaged AT&T's facilities throughout the area.

On January 26, 2018, AT&T filed a request pursuant to Section 63.63(b) to renew the emergency authorization to suspend its services until April 30, 2018. At that time, AT&T had completed its network restoration in 86 (76.8%) of the 112 Distribution Areas (DAs) that incurred damage requiring more complex restoration plans. On April 18, 2018, AT&T filed a subsequent request to renew the emergency authorization to suspend services until October 30, 2019. As of April 2018, AT&T has completed its network restoration in 89 (79.5%) of the 112 Distribution Areas (DAs).

In the remaining areas, the damage was so severe that AT&T was required to build new facilities to restore services. By October 31, 2019, AT&T will complete 18 of 20 projects to install fiber over the damaged copper network. Unfortunately, two fiber projects require additional time to complete.

These two projects were delayed due to availability of fiber optic cable and securing easements and permits from the city. In fact, AT&T has made several attempts to complete one of these projects, but its efforts were unsuccessful due to the extremely rocky terrain. Each time our approved plan of action fails, a new set of encroachment permits must be designed and submitted to the City of Santa Rosa for review and approval. At this time, AT&T is on the 3rd iteration of trenching/boring attempts. AT&T expects to fully restore service to these areas before December 30th, 2019, and accordingly renew its request for an extension of the emergency discontinuance authorization until that date.

AT&T also requests a waiver of 63.63(b), which required it to seek a renewal of the emergency authorization to suspend service not later than 10 days prior to the expiration of the authorized period. The waiver should be granted as good cause exists as there was a miscommunication within AT&T concerning the actual completion of the projects. Further, there

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is no harm associated with this minor error as AT&T continues to restore its services as expeditiously as possible.

Best regards,

A handwritten signature in black ink, appearing to read "Terri L. Hoskins", with a long, sweeping horizontal line extending to the left.

Terri L. Hoskins

cc: Kimberly Jackson