

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Applicant(s): AT&T Services, Inc., on behalf of its affiliates, BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee; Illinois Bell Telephone Company, LLC, d/b/a AT&T Illinois; Indiana Bell Telephone Company, Incorporated, d/b/a AT&T Indiana; Michigan Bell Telephone Company, d/b/a AT&T Michigan; Nevada Bell Telephone Company, d/b/a AT&T Nevada; Pacific Bell Telephone Company, d/b/a AT&T California; Southwestern Bell Telephone Company, d/b/a AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma, and AT&T Texas; The Ohio Bell Telephone Company, d/b/a AT&T Ohio; and Wisconsin Bell, Inc., d/b/a AT&T Wisconsin.

WC Docket No. 19-238

**SUPPLEMENTAL COMMENTS OF THE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

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October 28, 2019

I. INTRODUCTION

Per our comments of September 30, 2019, the California Public Utilities Commission (CPUC) hereby submits additional information regarding AT&T's Section 214 application(s). CPUC staff contacted certain customers of AT&T's program audio service, and has found that these customers, contrary to AT&T's assertions, do not know that their service is being discontinued. Program audio is used by radio and television stations to send their signal to the public, and terminating the service on the schedule AT&T has proposed in its application would be a huge burden for companies which are unaware they will lose service. From AT&T's application: "AT&T plans to discontinue Program Audio Service on or after November 1, 2020, or upon the expiration of the customer's existing term agreement, whichever is later."

CPUC staff spoke with representatives from VietLink Radio, Multicultural Radio in Sacramento, KHTS Amizzo Radio and CBS Radio SF --- none of whom were aware of the pending discontinuance or the letters which were supposedly sent from AT&T.¹ Because of the short time frame, and due to the fact that the CPUC is heavily engaged in the response to the California wildfires, we have not been able to contact more media companies who are on the program audio discontinuance list or other customers who have services which are planned to be discontinued. However, it is clear that the customers we have contacted have no idea what is about to happen, or have even begun to plan for it.

¹ These customers authorized us to identify them in these comments.

The determination to grant this application is partially based on whether “the public convenience and necessity is otherwise adversely affected.” 47 CFR § 63.71 (5) (ii). Terminating service to customers that provide broadcast programming to the public would negatively affect the public convenience and necessity. The FCC should deny the application(s) as AT&T has failed to demonstrate it has taken steps to ensure its customers will not be left without service. At the very least, the FCC should notify AT&T that its Section 214 application to discontinue identified services in California will not become effective on October 29, 2019.

Respectfully submitted,

By: /s/ KIMBERLY J. LIPPI

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