



Victoria Carter-Hall
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March 2, 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 (ATT20180228C.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>
ATT20180228C.1	<p>Pacific Bell Telephone Company d/b/a AT&T California has 5 Central offices (CO's) in the counties affected by the fires. All 5 CO's had areas within them that were burned, which included 80 Distribution Areas (DA's). After assessing these 80 DA's in the field, 42 DA's were cleared as having no damage to facilities; 28 DA's were repaired and restored; and 10 DA's incurred damage requiring more complex restoration plans. Of those 10 DA's, service has been restored in 8.</p> <p>Because the damage to the copper facilities in the remaining DAs was so severe, AT&T California determined that the copper feeder plant serving two Distribution Areas would be replaced with fiber optic feeder cable within the Ojai (OJAICA11- 202 W Ojai Ave. Ojai, CA 93023) central office area.</p> <p>This action will require the retirement of the copper feeder plant to the Ojai DA's 214102 and 413501. The circuits will be transferred from a copper based remote terminal system to a fiber based Digital Loop Carrier (DLC) system. The transfer of these circuits does not compromise the capacity of the remote terminal cabinets. Service quality is expected to be improved by the placement of fiber cable and the DLC systems.</p>	<p>Los Angeles, CA</p> <p>Riverside, CA</p> <p>San Diego, CA</p> <p>Santa Barbara, CA</p> <p>Ventura, CA</p>

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 "Victoria Carter Hall". The signature is written in a cursive style with a horizontal line at the end.

Attachments

cc: Carmell Weathers
Michael R. Peevey, 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:**

ATT20180228C.1

Issue Date: 3/2/2018

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:

Richard Hatch

131 Huntsville Rd

Eureka Springs, AR 72632

(479) 253-7675

rh4979@att.com

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

Implementation Date: On or after December, 2017

Description of Network Changes Planned:

On or after December 4, 2017, AT&T's facilities were severely damaged or destroyed by three fires that spread across five counties in Southern California and major mudslides that followed in the burn areas.

On Monday, December 4, 2017, the Thomas fire originated as two separate fires, with the first igniting on December 4th, in Santa Paula Canyon, near Thomas Aquinas College. The second fire started shortly thereafter nearly 4 miles North in upper Ojai, at the top of Koenigstein Road. The fires soon merged, which caused major damage and loss of life in five counties in Southern California: Los Angeles, Riverside, San Diego, Santa Barbara and Ventura Counties. It is estimated that 315,000 acres burned, which destroyed or damaged at least 1300 structures, and killed two people.

On December 5th, Governor Jerry Brown declared a state of emergency for Ventura and Los Angeles Counties, followed by San Diego County on the 7th. On December 5, 2017, AT&T California initially activated its disaster recovery plan; expanding the scope of the areas affected as the fires continued to burn. On January 2, 2018 President Donald J. Trump approved a major disaster declaration for California. On 2/2/2018, AT&T 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.

In addition, on January 8, 2018, a storm system moved into Southern California prompting mandatory evacuations in parts of Los Angeles, Santa Barbara, and Ventura counties over potential mudslides in areas affected by the wildfires. The storm intensified on the following days, with two to four inches of rain falling over the two day period, and causing several major mudflows. The mudslides added delay to AT&T's restoration of the areas impacted by the fires.

Pacific Bell Telephone Company d/b/a AT&T California has 5 Central offices (CO's) in the counties affected by the fires. All 5 CO's had areas within them that were burned, which included 80 Distribution Areas (DA's). After assessing these 80 DA's in the field, 42 DA's were cleared as having no damage to facilities; 28 DA's were repaired and restored; and 10 DA's incurred damage requiring more complex restoration plans. Of those 10 DA's, service has been restored in 8.

Because the damage to the copper facilities in the remaining DAs was so severe, AT&T California determined that the copper feeder plant serving two Distribution Areas would be replaced with fiber optic feeder cable within the Ojai (**OJAICA11**- 202 W Ojai Ave. Ojai, CA 93023) central office area.

This action will require the retirement of the copper feeder plant to the Ojai DA's 214102 and 413501. The circuits will be transferred from a copper based remote terminal system to a fiber based Digital Loop Carrier (DLC) system. The transfer of these circuits does not compromise the capacity of the remote terminal cabinets. Service quality is expected to be improved by the placement of fiber cable and the DLC systems.

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 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. 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 does not offer unbundled loops over fiber.

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.

List of affected premises included on the NCN as an excel attachment at - https://ebiznet.att.com/networkreg/regulatory_documents/ATT20180228C.1_Web.doc
A hard copy of this list can be obtained by contacting Richard Hatch at the address listed above.