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April 18, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

**RE: Notification of Discontinuance of Common-Carriage Tariffed Wireline
Broadband Internet Access Service ("WBIAS") and Initiation of Provision on
a Permissive Detariffed Common-Carriage Basis by:**

**Fidelity Telephone Company
FCC Registration Number 0002550309
Study Area Code 421882**

CC Docket No. 02-33

Dear Ms. Dortch:

John Staurulakis, Inc. (JSI), on behalf of Fidelity Telephone Company (Company), an issuing carrier for NECA Tariff F.C.C. No. 5, respectfully files the attached notice pursuant to the *Wireline Broadband Order* of the intent of the Company to discontinue its Wireline Broadband Internet Access Service (WBIAS) offerings under NECA Tariff F.C.C. No. 5 effective July 3, 2018. Upon discontinuance of the tariffed offerings, the Company will provide WBIAS on a common-carriage non-tariffed basis. See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (*Wireline Broadband Order*).

Any questions regarding the notice may be directed to me at the address and telephone number listed above or by email at jkuykendall@jsitel.com.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
Vice President

Attachment

cc: Fidelity Telephone Company
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Eric Greitens, Governor of Missouri
Missouri Public Service Commission
National Exchange Carrier Association

**Notice of Permissive Detariffing of Wireline Broadband Internet Access Service
Effective July 3, 2018 by**

FIDELITY TELEPHONE COMPANY – SAC 421882

64 North Clark Street

Sullivan, MO 63080

573-468-8081

CC Docket No. 02-33

Fidelity Telephone Company (“Company”) hereby provides notice that it plans to terminate provision of wireline broadband Internet access service (WBIAS) on a tariffed basis effective July 3, 2018 at which time it plans to offer permissive detariffed WBIAS on a Title II common-carriage basis pursuant to paragraph 94 of the Federal Communications Commission’s *Wireline Broadband Order*.¹ The Company currently offers WBIAS through Asymmetric Digital Subscriber Line (“ADSL”) Access Service and Symmetric Digital Subscriber Line (“SDSL”) Access Service under National Exchange Carrier Association (“NECA”) Tariff F.C.C. No. 5, for which the Company is an issuing carrier.

The Company has requested of NECA that it remove the Company as a carrier listed in NECA Tariff F.C.C. No. 5 as a provider of ADSL and SDSL Access Services (hereinafter “WBIAS”) under the tariff effective July 3, 2018.

Impact on Customers

The only customer for the Company’s WBIAS is the Company’s affiliate nonregulated Internet Service Provider (“ISP”) operation. The affiliate purchases WBIAS for use as a component in its broadband Internet service sold to consumers and business customers. The discontinuance of the tariffed offering of WBIAS will have no effect on the end user service provided by the affiliate.

Serving Area

The company’s provision of WBIAS is limited to its ILEC serving area in Missouri.

Future Availability of WBIAS on a Permissive-Detariffed Common Carriage Basis

The Company will continue to make WBIAS available on a common-carriage basis through posting of rates, terms and conditions on its Internet web-site in a manner similar to that required for interstate and international interexchange services under Section 42.10 of the FCC’s rules (47 C.F.R. § 42.10).

¹ See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (*Wireline Broadband Order*).

FIDELITY TELEPHONE COMPANY

64 North Clark Street

Sullivan, MO 63080

573-468-8081

WBIAS DETARIFFING TIMELINE

April 18, 2018

30-Day Notice filed with following:

Federal Communications Commission (under CC Docket No. 02-33)
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Eric Greitens, Governor of Missouri
Missouri Public Service Commission
National Exchange Carrier Association

April 18, 2018

Notice to customers.

As indicated above, the only customer for the Company's wireline broadband Internet Access Service (WBIAS) is the Company's affiliate nonregulated ISP operation. The 30-day notice to the affiliate ISP will be provided by interoffice memorandum cover with this notice attached.

June 18, 2018

Expected filing by NECA on 15-day notice of a tariff transmittal that will include, *inter alia*, removal of Fidelity Telephone Company from the list of issuing carriers offering ADSL and SDSL Access Service.

July 3, 2018

Planned NECA tariff filing to become effective. Beginning on this date the Company no longer offers WBIAS under NECA Tariff F.C.C. No. 5.

July 3, 2018 Forward

WBIAS available on common-carriage non-tariffed basis under rates, terms and conditions posted at www.fidelitycommunications.com.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notification of Discontinuance of Common Carrier Tariffed Wireline Broadband Internet Access Service was served this 18th day of April, 2018 by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense
Attn: Special Assistant for Telecommunications
1000 Defense Pentagon
Washington, D.C. 20301-1000

Office of Governor Eric Greitens
P.O. Box 720
Jefferson City, MO 65102

Morris Woodruff, Secretary
Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City, MO 65102-0360

National Exchange Carrier Association
80 South Jefferson Road
Whippany, New Jersey 07981

A handwritten signature in black ink, appearing to read "Kim Walbridge", is written over a horizontal line.