

Before the  
Federal Communications Commission  
Washington D.C. 20554

In the Matter Of	)	
	)	
Section 63.71 Application of	)	
	)	
Windstream NuVox, LLC	)	WC Docket No. _____
PAETEC Communications, LLC	)	
	)	
For Authority Pursuant to Section 214 of	)	
the Communications Act of 1934 to	)	
Discontinue the Provision of Service	)	

**SECTION 63.71 APPLICATION OF WINDSTREAM SERVICES, LLC**

Windstream Services, LLC ("Windstream"), on behalf of its competitive local exchange carrier affiliates Windstream NuVox, LLC, and PAETEC Communications, LLC (collectively "Windstream"), through its undersigned counsel and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, hereby files this Application to discontinue the provision of DS0/POTS services, Digital Subscriber Line services, DS1/1.5Mb T-1 Voice, Data and Integrated services (collectively "Affected Services") in Louisville, Kentucky and Nashville, Knoxville and Clarksville, Tennessee. In support of this Application, Windstream submits the following information:

**1. Information listed in 47 C.F.R. § 63.71(a)(1)-(4) (47 C.F.R. § 63.71(b)(2)):**

**a. Name and Address of Carrier (47 C.F.R. § 63.71(a)(1)-(4), (b)(2)):**

Windstream NuVox, LLC  
PAETEC Communications, LLC  
4001 North Rodney Parham Rd.  
Little Rock, AR 72212

**b. Date of Planned Discontinuance (47 C.F.R. § 63.71(a)(2), (b)(2)):**

Windstream plans to discontinue the Affected Services on or about July 31, 2018.

**c. Point of Geographic Areas of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):**

Affected Services will be discontinued in Louisville, Kentucky and Nashville, Knoxville and Clarksville, Tennessee.

**d. Brief Description of the Type of Service to be Affected (47 C.F.R. § 63.71(a)(4), (b)(2)):**

The services to be affected are DS0/POTS services, Digital Subscriber Line services, DS1/1.5Mb T-1 Voice, Data and Integrated currently being offered on end of life equipment.

**2. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):**

On June 1, 2018, Windstream sent by First Class U.S. Mail notice to all affected customers of the planned discontinuance. A copy of such notice is attached hereto as Attachment 1, which is compliant with, among other things, Section 63.71(a)(5) of the Commission's rules, 47 C.F.R. § 63.71(a)(5).

**3. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (a)(4)):**

Windstream is nondominant with respect to the services that it proposes to discontinue.

**4. Service:**

In accordance with Section 63.71(a)(1) of the Commission's rules, 47 C.F.R. § 63.71(a)(1), Windstream is submitting a copy of this Application by First Class U.S. Mail to the Kentucky Public Service Commission and the Office of Kentucky Governor, Matt Bevin, to the Tennessee Public Utility Commission and the Office of Tennessee Governor, Bill Haslam and also to the Secretary of Defense (at the address given in 47 C.F.R. § 63.71(a)).

**5. Additional Questions Regarding This Application May be Addressed to the Undersigned.**

**6. Circumstances of Discontinuance.**

Windstream provides the Affected Services throughout the Louisville, Kentucky, and the Nashville, Knoxville and Clarksville metropolitan areas. The Affected Services are provided on end-of-life platforms that are scheduled to be decommissioned on or about July 31, 2018. The discontinuance of the Affected Services will affect a total of 36 small business customers and 9 enterprise business customers in these areas of Kentucky and Tennessee. Windstream will assist affected customers in migrating their services to Windstream's supported platform or upgrade to one of our more robust unified communications products.

These customers will not be unduly harmed because they are being provided ample notice of the discontinuance and are being offered alternative services to the ones being discontinued. Furthermore, customers have comparable options at comparable rates from other providers serving these Kentucky and Tennessee locations.

**7. Conclusion**

Windstream believes that the proposed discontinuance is reasonable and necessary. As outlined herein, Windstream will take reasonable steps to assure that the discontinuance of this service is not unduly disruptive to the present or future public convenience and necessity. Accordingly, Windstream respectfully requests that the Commission permit it to discontinue the provision of the Affected Services to customers in Louisville, Kentucky, and in Nashville, Knoxville and Clarksville, Tennessee pursuant to Section 63.71.

Respectfully submitted

A handwritten signature in black ink that reads "Edward J. Cadieux". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

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Edward J. Cadieux  
Regulatory Counsel  
Windstream Services, LLC  
4001 N. Rodney Parham Rd.  
MS: 1170-B1F03-53A  
Little Rock, AR 72112  
(314) 249-0216  
Edward.Cadieux@windstream.com

June 1, 2018

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Section 63.71 Application was served this 1st day of June, 2018, by mailing true and correct copies thereof, postage prepaid, to the following persons to the addresses listed below.


Secretary of Defense  
Attn: Special Assistance for Telecommunications  
Pentagon  
Washington, DC 20301

Gwen Pinson, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601

Matt Bevin  
Office of the Governor of the Commonwealth of Kentucky  
700 Capital Avenue, Suite 100  
Frankfort, KY 40601

Sharla Dillon, Dockets and Records Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Bill Haslam  
Office of the Governor  
State Capitol, 1<sup>st</sup> Floor  
600 Charlotte Ave.  
Nashville, TN 37243

A handwritten signature in black ink, reading "Edward J. Cadieux". The signature is written in a cursive, flowing style.

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Edward J. Cadieux

**Attachment 1**

**Customer Notice**



June 1, 2018

Windstream Services, LLC  
4001 N. Rodney Parham Rd.  
Little Rock, AR 72212

<<Contact>>  
<<Company>>  
<<Address>>  
<<City, State Zip>>

**Important Notification Regarding Your Service for Account # <Acct No>**

Because your business matters to Windstream, we wanted to provide advance notification of some changes we are making to the location from which your current DS0/POTS services, DS0/DSL services and/or DS1/1.5Mb T-1 Voice, Data and Integrated services are provisioned.

**The platform that currently supports these DS0/POTS services, DS0/DSL services and DS1/1.5Mb T-1 Voice, Data and Integrated services has reached the end of its useful life. As a result, Windstream customers in the Louisville, KY and Nashville, Knoxville and Clarksville, TN areas will have these services retired on July 31, 2018.**

The change requires action on your part and we want to work with you to make you aware of your options and assist you in any way possible to ensure a smooth transition prior to the service retirement.

**To avoid service interruption, we encourage you to take action as soon as possible by contacting Customer Care at <Care No.>, no later than June 22, 2018 to explore an alternative service solution. Failure to do so may result in permanent service termination or insufficient time to transition to a replacement service, with no immediate restoral options.**

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Windstream Services, LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Thank you for your time and attention to this important matter to ensure enough time is allotted to select and migrate to a new solution prior to July 31, 2018.

Regards,

Customer Care