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June 16, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Certification of Short Term Public Notice Under Rule 51.333(a);
CC Docket No. 96-98**

Dear Ms. Dortch:

Pursuant to the notification requirements in §51.325 -- §51.335 of the Commission's rules, AT&T hereby submits this Certification of Short Term Public Notice of Network Change. A description of the network change is attached, and is also available online.

<u>NUMBER</u>	<u>TYPE OF CHANGE PLANNED</u>	<u>LOCATION OF CHANGE</u>
ATT20170608S.1	BellSouth Telecommunications LLC d/b/a AT&T Tennessee intends to re-route the copper feeder facilities in the Chickasaw wire center (MMPHTNCT – 105 S. Holmes St, Memphis, TN) Route 8 due to a Tennessee DOT road project on Poplar Av. All AT&T facilities in conflict with the construction area must be re-routed for the project to commence. There will be no right of way to re-route our facilities along the existing path, because an existing bridge is being removed and replaced over the course of a two-year timeline, so a new path must be built. Copper facilities will remain available at the completion of this project, but due to loss of the existing physical path and space limitations in the new right of way, an exact like-for-like copper replacement is not possible. Services will continue to be provided over copper as well as Digital Loop Carrier (DLC) systems that provide pair gain facilities through feeder fiber.	Memphis, TN

This notice is also available at: <https://ebiznet.att.com/networkreg/>

If you have any questions, please do not hesitate to contact me at (202) 457-2164.

Sincerely,

Attachments

cc: Carmell Weathers

CERTIFICATION OF PUBLIC NOTICE(s) OF NETWORK CHANGE(s) UNDER RULE 51.329(a)

On **June 16, 2017** the following Public Notice(s) of Network Change(s) have been made by **AT&T Tennessee** pursuant to Code of Federal Regulations 47, Subsections 51.325 – 51.335.



Terry L McKenzie
Manager - Regulatory Relations
Telephone: (605) 530-9456 Date: 06/16/2017

The Public Notice(s) can also be obtained on the Internet at:

<https://ebiznet.att.com/networkreg/>

Title(s) of Network Notification(s):

ATT20170608S.1

**CERTIFICATION OF SHORT TERM PUBLIC NOTICE
UNDER RULE 51.333(a)**

I, Terry L McKenzie, do hereby certify that on **June 09, 2017** (a minimum of five business days prior to this filing), I caused the **AT&T Tennessee** Public Notice listed on the attached Short Term Public Notice of Network Change to be served via U.S. Mail or e-mail at the other service provider's preference, upon each known provider of telephone exchange service that interconnects directly with **AT&T Tennessee** in the applicable area(s). Attached are the names and addresses of those providers who were served.



Terry L McKenzie
Manager - Regulatory Relations
Telephone: (605) 530-9456

Date: 06/09/2017

The Public Notice(s) can also be obtained on the Internet at:

<https://ebiznet.att.com/networkreg/>

Title(s) of Network Notification(s):

ATT20170608S.1

SHORT TERM PUBLIC NOTICE of NETWORK CHANGE UNDER RULE 51.333(a)

Network Disclosure ID: ATT20170608S.1 **Issue Date:** 06/16/2017

Carrier's Name: BellSouth Telecommunications, LLC d/b/a AT&T Tennessee

Carrier's Address: 1120 20th Street NW, Suite 1000, Washington, DC 20036

Contact: Your Account Manager or Service Representative
or
For technical issues contact
Terry McKenzie
2800 W 10th St. Rm208
Sioux Falls, SD 57104
605-530-9456
tm921b@att.com

Public Notice has been given in compliance with §§ 51.325 through 51.335.

Public Notice Available on the internet at: <https://ebiznet.att.com/networkreg/>

Implementation Date: On or after November 2017

Description of Planned Network Changes:

BellSouth Telecommunications LLC d/b/a AT&T Tennessee intends to re-route the copper feeder facilities in the Chickasaw wire center (MMPHTNCT – 105 S. Holmes St, Memphis, TN) Route 8 due to a Tennessee DOT road project on Poplar Av. All AT&T facilities in conflict with the construction area must be re-routed for the project to commence. There will be no right of way to re-route our facilities along the existing path, because an existing bridge is being removed and replaced over the course of a two year timeline, so a new path must be built. Copper facilities will remain available at the completion of this project, but due to loss of the existing physical path and space limitations in the new right of way, an exact like-for-like copper replacement is not possible. Services will continue to be provided over copper as well as Digital Loop Carrier (DLC) systems that provide pair gain facilities through feeder fiber.

Description of Reasonably Foreseeable Impact of the Planned Changes:

Copper cable will remain available to all addresses where it is currently available, but many customers will experience some manner of cutover to new facilities, whether to the re-routed copper or Digital Loop Carrier (DLC). After the work is completed, copper feeder facilities from the Central Office to the affected areas will have an increased loop length. Unbundled loops that are defined as compatible with DLC, e.g., those defined to transport POTS-grade service, will be transferred to the new fiber fed DLC system without consequence. Unbundled loops that are defined to require copper facilities, e.g., Digital Subscriber Line (DSL) or line sharing circuits will be impacted by the additional copper length, resulting in unavailability for

some locations. Currently, AT&T has 19 Competitive Carrier circuits defined to require copper facilities on the affected copper facilities. At the completion of this project, two of these CLEC DSL circuits will be have a loop length that is too long to maintain the existing service, as a result of having to re-route the copper along the new, longer path to bypass the road work. AT&T Tennessee is providing separate notice to the affected competitive carrier(s).

Address	Loop Name
2451 jackson av	t3.lxfu.623873..sc ckl 2
769 holly st	t3.lxfu.623829..sc ckl 2

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 will have no knowledge of the presence of DSL. In such a case, AT&T has no basis to notify the carrier and the ability of the competitive carrier to provide DSL service may be affected.

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