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June 27, 2018

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

**Re: Certification Notice of Copper Retirement Under Rule 51.332
ATT20180223C.1 – San Antonio, TX
WC Docket No. 18-87, Report No. NCD-2812**

Dear Ms. Dortch:

Pursuant to §51.332(d) of the Commission's rules, Southwestern Bell Telephone Company d/b/a AT&T Texas (AT&T) hereby submits the attached certification executed by Jacquelyne Flemming, an authorized representative of AT&T. The attached certifies that AT&T has met the requirements of the Commission's rules related to the San Antonio, Texas Copper Retirement Network Change Notification (ATT20180223C.1) filed on February 27, 2018. The Commission's Public Notice of this change was released on March 29, 2018.

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

Sincerely,

A handwritten signature in black ink that reads "Victoria Carter-Hall". The signature is written in a cursive, flowing style.

Victoria Carter-Hall
Manager – Federal Regulatory

Attachments

cc: Carmel Weathers

Certification of Compliance with Commission Rule 51.332(d)
Notice of Network Changes: Copper Retirement
ATT20180223C.1 – San Antonio, TX
(WC Docket No. 18-87; Report No. NCD-2812)

I, Jacquelyne Flemming, Assistant Vice President-External Affairs/Regulatory, as an authorized representative of Southwestern Bell Telephone Company d/b/a AT&T Texas (AT&T) certify that:

1. Pursuant to paragraph 51.332(d)(1), AT&T provides the following statement identifying the proposed change:

AT&T Texas intends to retire and remove copper feeder facilities. The copper feeder cables that serve two Serving Area interfaces (SAIs) will be retired and consolidated into a single fiber fed Digital Loop Carrier (DLC) system in the Martinez Wire Center, SNANTXMA – (1427 Ackerman Rd., San Antonio, TX 78219).

2. Pursuant to paragraph 51.332(d)(2), AT&T provides the following statement:

Notice of the proposed change was filed with the Commission on February 27, 2018 in compliance with paragraph 51.332(b)(1).

3. Pursuant to paragraph 51.332(d)(3), AT&T provides the following statement:

AT&T timely served a copy of its notice filed pursuant to paragraph 51.332(b)(1) upon each entity within the affected service area that directly interconnects with AT&T's network.

4. Pursuant to paragraph 51.332(d)(4), the names and addresses of each entity directly interconnected with AT&T's network in the service area affected by this change were served the previously referenced notice provided in the Attachment.

5. Pursuant to paragraph 51.332(d)(5), AT&T provides the following statement:

The proposed network change affects AT&T's network in the state of Texas. AT&T timely notified and submitted a copy of its public notice to the Texas Public Utilities Commission, Office of the Governor of Texas, and the Department of Defense. There are no federally recognized Tribal Nations with authority over Tribal lands in which the network change is proposed.

6. Pursuant to paragraph 51.332(d)(6), AT&T provides the following statement:

No customer notification was required under paragraph 51.332(b)(3). AT&T had no retail customers affected by the proposed change.

7. Pursuant to paragraph 51.332(d)(8), provides the following statement:

The proposed changes are not reasonably expected to render any customer's terminal equipment incompatible with AT&T's communications facilities, or require modification or alteration of such terminal equipment, or otherwise materially affect its use or performance, therefore the notification requirements of §68.110(b) do not apply.

8. Pursuant to paragraph 51.332(d)(8), provides the following statement:

AT&T has complied with the good faith communication requirements of 51.332(g) and will continue to do so until implementation of the planned copper retirement is complete.

9. The FCC's Public Notice dated March 29, 2018, assigned WC Docket No. 18-87, Report No. NCD-2812 to the notice AT&T provided pursuant to 51.332(b)(1).

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 27, 2018.



Jacquelyne Flemming, AVP External Affairs/Regulatory

Attachments

ATTACHMENT

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