



**Brief Description of Type of Service Affected (47 C.F.R. §§63.71(a)(3), (b)(2)):**

PulseNet Service is an alarm service which utilizes derived channel technology to transport signals from an end-user's location to the end-user's monitoring agency over the end-user's exchange access line. The end-user's monitoring sensor is customer premises equipment located in the end-user's monitored location. The Service uses a scanner located at the end-user's serving central office which receives information from the end-user's monitoring sensor over the end-user's exchange access line, even when the line is in use. A change in the status of the end-user's monitoring sensor is identified by customer premises equipment located on the end-user's premises and is transported through the scanner to a centrally located message switch. The message switch transports the change in status indication to the end-user's monitoring agency over compatible private line facilities subscribed to by the monitoring agency.

Broadview has advised each of the 42 commercial customers of the Service of the planned discontinuance of the Service as a result of the discontinuance of the Service by Broadview's underlying service provider and has explained that no product currently exists which would provide an identical functionality as the Service. While Broadview does offer other reasonably similar alarm products, those products differ from PulseNet Service in one particular way – while PulseNet Service is continually “open”, Broadview's other alarm products only “open” and advise the customer of a situation at the time of its occurrence. Other than these 42 commercial customers, no other Broadview customer will be impacted by the decision of Broadview's underlying service provider to cease providing the Service to wholesale customers such as Broadview. In all

other respects, Broadview will continue serving these 42 specific commercial customers; only PulseNet Service will be discontinued.

Broadview has tasked a dedicated team of service representatives to work with these 42 commercial customers in order to facilitate a transfer, if desired by the customer, to an alternative service arrangement which, while not identical, would mirror in many ways the functionality of the Service for these customers. No residential customers will be affected by the proposed service discontinuance. Accordingly, the public convenience and necessity will not be impaired by this service discontinuance.

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

As noted above, only 42 of Broadview's commercial customers utilize the Service slated for decommissioning by Broadview's underlying service provider; all affected service locations of those 42 commercial customers are located within the States of Massachusetts and New York. No Broadview residential customer will be impacted by the discontinuation of PulseNet Service.

In accordance with FCC rules, on July 25, 2017, Broadview sent written notice of the anticipated discontinuance of the Service to all 42 commercial customers; this notice was sent to each customer's regular record address for the delivery of all correspondence, including monthly service bills, via U.S. Mail, postage prepaid. Each customer was advised of each of its service locations to which the Service would be discontinued following FCC approval. The text of such notices is set forth hereto as Attachment A.

Copies of this Application are being sent, First Class U.S. Mail, to the public utility commissions and the Governors of the States of Massachusetts and New York and

also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by §63.71(a) of the Commission's Rules.

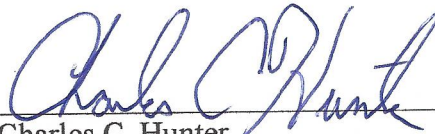
**Regulatory Classification of Carrier (47 C.F.R. §63.71(b)(4)):**

Broadview is considered non-dominant with respect to the service to be discontinued. Questions about this Application may be addressed to Catherine M. Hannan, Deputy General Counsel of Broadview Networks, Inc., 14300 Gallant Fox Lane, Suite 103, Bowie, MD 20715, or (240) 461-0412 or [channan@broadviewnet.com](mailto:channan@broadviewnet.com).

**Conclusion:**

The public convenience and necessity will not be adversely affected by the discontinuance of this Service since there is very low demand and various alternatives for the Service. Broadview respectfully requests that the Commission approve its Section 63.71 Application.

Respectfully submitted,



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Executive Vice President and General  
Counsel  
Broadview Networks, Inc.  
800 Westchester Avenue, Suite N-501  
Rye Brook, NY 10573

(914) 922-7589

Its Attorney

July 26, 2017

## **ATTACHMENT A**





Making Connections That Make a Difference

800 Westchester Ave.  
Suite N-501  
Rye Brook, NY 10573  
240-461-0412  
800-276-2384

July 25, 2017

[Customer Name]

[Address]

[Address]

Re: Discontinuance of PulseNet Service to  
[Service Location Address(es)]

Dear [Customer Name]:

Broadview Networks has been informed by one of our underlying carriers that it will be discontinuing service of the product which enables Broadview to provide PulseNet Service (the "Service") to you at the above service address(es) on September 1, 2017.

As you are aware, PulseNet Service is an alarm service which utilizes derived channel technology to transport signals from your location to your monitoring agency over your exchange access line. The monitoring sensor is customer premises equipment located in your monitored location. The Service uses a scanner located at your serving central office which receives information from the monitoring sensor over your exchange access line, even when the line is in use. A change in the status of the monitoring sensor is identified by customer premises equipment located on your premises and is transported through the scanner to a centrally located message switch. The message switch transports the change in status indication to your monitoring agency over compatible private line facilities subscribed to by the monitoring agency.

Unfortunately, no Broadview product currently exists which would provide an identical functionality as the Service. While Broadview does offer other reasonably similar alarm products, those products differ from PulseNet Service in one particular way – while PulseNet Service is continually "open", Broadview's other alarm products only "open" and advise the customer of a situation at the time of a triggering occurrence. We have been in contact with you to provide you the opportunity to select another available product which should provide many of the functionalities of the Service. As of the date of this letter, you have not indicated whether you desire to transition to another available service product or simply to permit the scheduled discontinuance of PulseNet Service to proceed apace (i.e., whether you no longer require or desire a service arrangement with the functionalities previously provided by PulseNet Service. To aid you in making this decision, Broadview will be in contact with you again in the near future. Broadview appreciates your continued assistance and cooperation as we work to accommodate the

changes necessitated by the discontinuance of the Service as a result of the retirement of the product which is slated for retirement by Broadview's underlying carrier.

The FCC will normally authorize the proposed discontinuance of service (or reduction or impairment), unless it is shown that a customer is unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity is otherwise adversely affected. If you do wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases the 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, Wireless Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Broadview Networks, Inc. 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.

On, or after September 1, 2017, subject to approval from the FCC, your existing PulseNet Service will be discontinued. **If you wish to allow the discontinuation of PulseNet Service to proceed as scheduled without selecting a replacement product, no action is required on your part.**

If you wish to migrate to a similar service, one which will mirror in many ways the benefits currently provided you by PulseNet Service, Broadview may require access to your premises to install the new service and/or equipment necessary to your migration to that new service. This may result in a short service interruption while your new service configuration is being installed. **Other than the unavailability of PulseNet Service after September 1, 2017, you will experience no changes to your Broadview services, which will continue to be provided to you in exactly the same manner as they are today.**

A Broadview representative will contact you within the next few days to discuss your choice of whether to replace PulseNet Service with a Broadview service which provides a similar functionality and, if necessary, to coordinate a date to migrate your company to that new service.

You may also contact our Customer Care line directly at **1-800-BROADVIEW** at any time to speak with a Customer Care representative should you have any questions or concerns.

We appreciate your assistance and patience through this transition and look forward to providing you with the best solution possible for your business.

**BROADVIEW NETWORKS**

**CERTIFICATE OF SERVICE**

I, Catherine M. Hannan, certify that I have, on this 26th day of July, 2017 served  
copies of the foregoing Section 63.71 Application of Broadview Networks, Inc., by U.S.

Mail, postage prepaid, to the following:


Hon. Sara J. Clark, Secretary  
Massachusetts Department of  
Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

The Honorable Charlie Baker, Governor of Massachusetts  
Office of the Governor  
Room 280  
Boston, MA 02113

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo, Governor of New York State  
Office of the Governor  
State Capitol  
Albany, NY 12224

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

  
Catherine M. Hannan