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August 5, 2019

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**RE: Section 63.71 Application of XO Communications Services, LLC and XO Virginia, LLC (WC Docket No. 19-203)**

Dear Ms. Dortch:

On July 5, 2019, Verizon subsidiaries XO Communications Services, LLC and XO Virginia, LLC (collectively "XO") filed an Application under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to grandfather and eventually discontinue certain services offered by XO. Verizon provides supplemental information regarding the following services also referenced in Exhibit A to the Application:

- Remote Call Forwarding ("RCF"): RCF is a local service that is provisioned from a local central office and billed to customers according to the local XO tariff or product guide. Should the customer choose to forward the call out of state, the customer is billed separately according to the terms of their long distance plan.
- Digital Subscriber Line ("DSL"): DSL is an information service that allows subscribers to access and transmit data to the internet.
- Distributed Denial of Service ("DDoS") Mitigation: DDoS Mitigation is a data service offered to XO internet subscribers to provide cybersecurity protection from DDoS attacks.
- Managed Modems Service: Managed Modems Service is offered on a private carriage basis.

Because these offerings are local, data and/or information services, or are offered by private carriage (or otherwise excluded), they are not subject to the Commission's Section 214 discontinuance rules. If you have any additional questions regarding this matter, please contact me at 202-515-2588.

Very truly yours,

Michele G. Cober

cc: Kimberly Jackson, Wireline Competition Bureau