

Before the  
Federal Communications Commission  
Washington D.C. 20554

In the Matter Of )  
)  
Section 63.71 Application of )  
)  
Windstream Alabama, LLC )  
Windstream Arkansas, LLC )  
Windstream Florida, LLC )  
Windstream Georgia, LLC )  
Windstream Georgia Communications, LLC )  
Georgia Windstream, LLC )  
Windstream Georgia Telephone, LLC )  
Windstream Standard, LLC )  
Windstream Accucomm, LLC )  
Windstream Iowa Communications, LLC )  
Windstream Montezuma, LLC )  
Windstream Kentucky East, LLC )  
Windstream Kentucky West, LLC )  
Windstream Lakedale, Inc. )  
Windstream Mississippi, LLC )  
Windstream Missouri, LLC )  
Windstream Nebraska, Inc. )  
Windstream New York, Inc. )  
Windstream North Carolina, LLC )  
Windstream Concord Telephone, LLC )  
Windstream Lexcom Communications, LLC )  
Windstream Ohio, LLC )  
Windstream Western Reserve, LLC )  
Windstream Oklahoma, LLC )  
Oklahoma Windstream, LLC )  
Windstream Pennsylvania, LLC )  
Windstream D&E, Inc. )  
Windstream Conestoga, Inc. )  
Windstream Buffalo Valley, Inc. )  
Windstream South Carolina, LLC )  
Windstream Texas, LLC )  
Windstream Sugar Land, LLC )  
Valor Telecommunications of Texas, LLC )  
)  
For Authority Pursuant to Section 214 of )  
the Communications Act of 1934, As Amended, )  
to Discontinue the Provision of Service )  
)

WC Docket No. 16-194

## **REPLY COMMENTS OF WINDSTREAM SERVICES, LLC**

On May 27, 2016, Windstream Services, LLC on behalf of its incumbent local exchange carrier affiliates (collectively “Windstream”), filed an application to discontinue the provision of operator assisted calls requesting Bill to a Third Number, Busy Line Verify, Busy Line Interrupt, Collect Calling, and Person to Person. On June 17, 2016, Windstream filed an amended application to correct certain inaccuracies included in the application filed on May 27, 2016 (the application filed May 27, 2016 and the amended application filed June 17, 2016 are referred to hereinafter as the “Application”).

Windstream received two comments via the Electronic Comment Filing System (“ECFS”) and another customer filed an informal complaint with the Commission. Windstream contacted all three customers by phone to explain the reasons for the discontinuance and answer questions. The customers were appreciative of the calls and understood the reasons for the discontinuance, but expressed disappointment with Windstream’s decision to discontinue the services. As discussed in these reply comments, the Commission should grant Windstream’s Application because none of the comments demonstrate that the public convenience and necessity will be impaired as a result of Windstream’s proposed discontinuance.<sup>1</sup>

The two comments filed via EFCS raised concerns about the proposed discontinuance of Busy Line Verify and Busy Line Interrupt (collectively “BLV/I”). As discussed in Windstream’s Application, Windstream resells these services from AT&T, which is discontinuing their availability due to low demand. Windstream believes that the

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<sup>1</sup> Windstream will address the comments and the informal complaint in these reply comments.

Commission already has approved AT&T's application to discontinue these services. Notwithstanding, several AT&T customers raised similar concerns to the ones received by Windstream. In its reply comments, AT&T states that it is not aware of any replacement products for BLV/I but the low usage for these services indicates that these services are obsolete and a replacement service is not needed.<sup>2</sup> Windstream agrees. As discussed in Windstream's Application, approximately 55 customers used the services to be discontinued (not just BLV/I). Customers now subscribe to other services such as call waiting or caller id, wireless services that have diminished the use and value customers had on BLV/I. Windstream is not alone. As a result of the low demand for these services, other carriers also have discontinued BLV/I offerings.<sup>3</sup> As demonstrated herein, customers are sporadically using these services because they are using other services to notify them when another party is trying to reach them. Accordingly, the public convenience and necessity will not be affected by Windstream's proposed discontinuance.

The customer who filed the informal complaint was concerned about the continued availability of collect calling. Windstream concurs with AT&T that the explosion of wireless services has diminished the value and need for collect calling. Further, as AT&T notes, customers have alternative services to those provided by Windstream such as 1-800-COLLECT and pre-paid calling cards.<sup>4</sup> As a result, the

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<sup>2</sup> See Reply Comments of AT&T Services, Inc., WC Docket No. 16-13 (filed March 7, 2016) at 2.

<sup>3</sup> See *Id.* at 4, noting that Waldron Telephone Company and Verizon's local exchange affiliates have discontinued BLV/I services.

<sup>4</sup> *Id.* at 5.

public convenience and necessity will not be impaired by Windstream's proposed discontinuance.

**Conclusion**

Windstream has demonstrated the public convenience and necessity will not be impaired by Windstream's discontinuance of BLV/I and collect calling. Windstream respectfully requests that the Commission approves its Application.

Respectfully Submitted,



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