



GVNW CONSULTING, INC.

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August 18, 2016

Filed electronically *via* ECFS

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

re: Application of Border to Border Communications, Inc. for Authority to
Discontinue Operator Services Pursuant to 47 C.F.R § 63.71

Dear Ms. Dortch:

Please find enclosed for filing the Application of Border to Border Communications, Inc. ("Border to Border") for Authority to Discontinue Operator Services in compliance with 47 C.F.R § 63.71 of the Commission's rules.

Please contact me at 830-895-7226 or sgatto@gvnw.com with any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Gatto", is written over a light blue circular stamp.

Steve Gatto
Authorized Representative for
Border to Border Communications, Inc.

Attachments

cc: Herman C. Roark, Jr., President
Border to Border Communications, Inc.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Section 63.71 Application of) Comp. Pol. File No. _____
Border to Border Communications, Inc.)
For Authority to Discontinue Operator Services)

SECTION 63.71 APPLICATION TO DISCONTINUE SERVICE

Border to Border Communications, Inc. (“Border to Border”), pursuant to Section 63.71 of the Commission’s Rules and Section 214(a) of the Communications Act of 1934, as amended, hereby files this application to discontinue operator services to customers the Company serves in the state of Texas (“Application”).¹ In support of this Application, Border to Border submits the following:

I. Information Required by Section 63.71(a)(1-4)

A. Name and Address of Carrier

Border to Border Communications, Inc.
718 Alpine Drive
Kerrville, TX 78028

For purposes of this application, the Commission should contact:

Herman C. Roark, Jr., President
Border to Border Communications, Inc.
718 Alpine Drive
Kerrville, TX 78028
956-936-2000
herman.roark@border2border.com

¹ As required by Section 63.71(a) of the Commission’s Rules and concurrent with this filing, Border to Border has notified and submitted a copy of this Application to the Public Utility Commission of Texas, the Governor of Texas, and the Secretary of Defense.

B. Date of Planned Service Discontinuance

Border to Border will discontinue billing to a third number, busy line verification, busy line interrupt, collect calling, and person-to-person calling to its customers in the state of Texas on or after August 31, 2016, subject to completion of all necessary federal and state regulatory approvals.

C. Points of Geographic Areas of Service Affected

Border to Border customers affected by the discontinuance of these services are located in Border to Border's service territory in the Falcon exchange in Zapata County in the state of Texas.

D. Brief Description of Types of Services Affected

In the areas referenced above, Border to Border provides the following services which will be discontinued (collectively, "Affected Services"):

- Bill to a Third Number - A billing arrangement by which an operator-assisted call may be charged to an authorized service point other than the service point originating the call or the service point where the call is terminated.
- Busy Line Verification – An operator service allowing the operator to confirm whether a line is idle or in use.
- Busy Line Interrupt – An operator service allowing the operator to break into a conversation when a line is in use.
- Collect Calling - A billing arrangement by which the charge for a call is reversed provided the charge is accepted at the called service point.
- Person-to-Person – A service where the person originating the call specifies to the operator a particular person to be reached, a particular mobile service point to be

reached through a Mobile Telephone Service attendant, or a particular station, department or office to be reached through a PBX attendant.

This discontinuance is limited to the above-mentioned Affected Services and will not affect other current services in any other way. Customers will continue to have access to general operator services without interruption.

II. Brief Description of the Dates and Methods of Notice to All Affected Customers

Customer notification letters were sent to all Border to Border local exchange customers *via* U.S. Mail as a bill insert on July 1, 2016. Exhibit A is a sample copy of the notification letter that was sent to customers. Border to Border deemed the bill insert the most economic method of reaching its customers and printed the insert on distinctly colored paper to distinguish it from the billing statement and bring sufficient attention to the Notice.

III. Status of Carrier

Border to Border is an incumbent local exchange carrier and considered a dominant carrier with respect to the services that it proposes to discontinue in the state of Texas.

IV. Circumstances of Discontinuance

The Company's discontinuance of the Affected Services was a business decision based on a lack of customer demand for the services. In the preceding 12 months, the Company has had no instances of a customer utilizing the Affected Services. Therefore, the discontinuance of these services will not adversely affect the Company's customers.

V. Certification

I, Herman C. Roark, Jr., the undersigned, President of Border to Border Communications, Inc., do hereby certify that the statements contained herein are true, complete, and correct to the best of my knowledge and made in good faith.

VI. Conclusion

For the reasons stated herein, the Company respectfully requests that the Commission approve its Section 63.71 Application to discontinue the Affected Services.

Respectfully Submitted,



Herman C. Roark, Jr., President
Border to Border Communications, Inc.
718 Alpine Drive
Kerrville, TX 78028
956-936-2000
herman.roark@border2border.com

Date

June 20, 2016

CERTIFICATE OF SERVICE

I, Steve Gatto, do hereby certify that I have served a true and correct copy of the foregoing Section 63.71 Application on the following *via* United States Mail:

Public Utility Commission of Texas
Central Records
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

The Honorable Greg Abbott, Governor
P.O. Box 12428
Austin, TX 78711-2428

Secretary of Defense
ATTN: Special Assistant for Telecommunications
Pentagon
Washington, DC 20301



Steve Gatto



Date

Exhibit A

Customer Notification

June 1, 2016

RE: FCC-Required Notice of Discontinuance of Certain Operator Services

Dear Valued Customer:

This letter is to inform you that on or after July 31, 2016, Border to Border Communications, Inc. ("Border to Border") will no longer be providing the below operator services within the state of Texas. Customers who attempt to utilize the discontinued services will be informed by the operator that the service is not available.

- Bill to a Third Number - A billing arrangement by which an operator-assisted call may be charged to an authorized service point other than the service point originating the call or the service point where the call is terminated.
- Busy Line Verification – An operator service allowing the operator to confirm whether a line is idle or in use.
- Busy Line Interrupt – An operator service allowing the operator to break into a conversation when a line is in use.
- Collect Calling - A billing arrangement by which the charge for a call is reversed provided the charge is accepted at the called service point.
- Person to Person – A service where the person originating the call specifies to the operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or a particular station, department or office to be reached through a PBX attendant.

This discontinuance is limited to the above operator services and will not affect your Border to Border service in any other way. Customers will continue to have access to general operator services.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases 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, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Border to Border Communications, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

If you have any questions about this notice or Border to Border's discontinuance of the above operator services, please contact us at 718 Alpine Drive, Kerrville, TX 78028 or 956.936.2000.

We thank you for your business.

Sincerely,
Border to Border Communications, Inc.