

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of)	File No.
Citizens Long Distance Company to)	
Discontinue Operator Services)	
)	

**SECTION 63.71 APPLICATION
OF
CITIZENS LONG DISTANCE COMPANY**

Pursuant to Section 214(a) of the Communications Act, as amended, and Section 63.71 of the Federal Communications Commission's rules, Citizens Long Distance Company ("Citizens Long Distance" or "the Company") hereby files this application to discontinue offering operator services throughout its service area in the state of Missouri.

In support of its application, Citizens Long Distance provides the following information:

I. Name and Address of Carrier (47 C.F.R. §§63.71(a)(1), (c)(2))

Citizens Long Distance Company
1905 Walnut Street
P.O. Box 737
Higginsville, MO 64037

II. Date of Planned Service Discontinuance (47 C.F.R. §§63.71(a)(2), (c)(2))

Citizens Long Distance plans to discontinue all operator services to its customers in the state of Missouri on or after November 1, 2018, subject to FCC authorization.

III. Points of Geographic Areas of Service Affected (47 C.F.R. §§63.71(a)(3), (c)(2))

Citizens Long Distance will discontinue operator services throughout its serving area, which consists of the Higginsville exchange (includes Higginsville, Corder, Mayview and Aullville) in Lafayette County, Missouri.

IV. Brief Description of the Type of Service Affected (47 C.F.R. §§63.71(a)(4), (c)(2))

In the above-referenced geographic area, Citizens Long Distance offers the following operator services which will be discontinued:

- Person-to-Person Calling – A service where the person originating an operator assistance call specifies to the Company operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or particular PBX service point, department, or office to be reached.
- Collect Calling – A billing arrangement by which the charge for an operator assistance call may be reversed (charged to the called service point) provided the call is accepted at the called service point.
- Billed 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 – A service allowing the operator to confirm when a line is idle or in use.
- Busy Line Interruption – A service allowing the operator to break into a conversation when a line is in use.

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

Citizens Long Distance notified all affected customers of its planned operator services discontinuance through a bill insert. The notice was printed on Company letterhead that is larger in size than the bill, in order to attract subscriber attention. The notice was included in the Company's September 1, 2018 bills which were sent via U.S. mail on August 31, 2018. A bill insert was deemed the most economical and effective means of notifying Citizens Long Distance's subscribers. Exhibit A contains a copy of the bill insert notice.

VI. Regulatory Classification of Carrier (47 C.F.R. §63.71(c)(4))

Citizens Long Distance is an interexchange carrier and considered a non-dominant carrier in the state of Missouri with respect to the operator services that it plans to discontinue.

VII. Circumstances of Discontinuance

Citizens Long Distance is discontinuing its operator services due to a lack of customer demand. The Company has had no instances of a subscriber utilizing any operator services for at least the past 12 months. Customers are using alternate technologies and methods of communication – including mobile phones, text messaging, e-mail, and social media applications – which have rendered operator services nearly obsolete. Moreover, given that there is substantial competition in the market for long distance service, if a customer wanted to use operator services, they could easily obtain those services from another interexchange carrier that provides them.

VIII. Conclusion

The public convenience and necessity will not be adversely affected by Citizens Long Distance's discontinuance of operator services because these services are not being used by customers and have largely been replaced with other technologies and communication methods.

Therefore, Citizens Long Distance requests that the FCC grant its Section 63.71 application to discontinue the operator services discussed herein.

Respectfully submitted,

/s/ Brian L. Cornelius
Brian L. Cornelius
President and General Manager

Citizens Long Distance Company
1905 Walnut Street
P.O. Box 737
Higginsville, MO 64037
(660) 584-5500

September 4, 2018

EXHIBIT A

CUSTOMER NOTICE



Notice of Operator Services Discontinuance

Dear Valued Customer:

This notice is to inform you that on or after November 1, 2018, Citizens Long Distance Company (“Citizens” or “the Company”) will no longer provide operator services in the state of Missouri. Specifically, the following operator services will be discontinued:

- **Person-to-Person Calling** – A service where the person originating an operator assistance call specifies to the Company operators a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or particular PBX service point, department, or office to be reached.
- **Collect Calling** – A billing arrangement by which the charge for an operator assistance call may be reversed (charged to the called service point) provided the call is accepted at the called service point.
- **Billed 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** – A service allowing the operator to confirm when a line is idle or in use.
- **Busy Line Interruption** – A service allowing the operator to break into a conversation when a line is in use.

Citizens will discontinue these operator services throughout the entirety of its service area which consists of the Higginsville exchange (includes Higginsville, Corder, Mayview and Aullville) in Lafayette County, Missouri. This discontinuance is limited only to operator services and will not affect the service you receive from the Company in any other way.

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 15 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 Citizens Long Distance Company. 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 Citizens’ discontinuance of operator services, please contact us at 1905 Walnut Street, P.O. Box 737, Higginsville, MO 64037, or by phone at 660-584-5500 or 800-321-4282.

We appreciate your business and look forward to continuing to serve your communications needs.

Sincerely,

Citizens Long Distance Company

CERTIFICATE OF SERVICE

I, Kristyna Rios, hereby certify that a copy of the foregoing Section 63.71 Application of Citizens Long Distance Company was sent by first class United States mail, postage prepaid, on this, the 4th day of September, 2018, to the addresses listed below.

Morris L. Woodruff, Secretary
Missouri Public Service Commission
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102-0360

Office of Governor Mike Parson
Capitol Building
Room 216, P.O. Box 720
Jefferson City, MO 65102

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

/s/ Kristyna Rios
Kristyna Rios
Administrative Assistant

Moss Adams LLP
8750 N. Central Expressway, Suite 300
Dallas, TX 75231
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