

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
Section 63.71 Application of )  
LDL Telecom Services, Inc. ) File No. \_\_\_\_\_  
d/b/a Key Communications Services )  
to Discontinue Service )

**SECTION 63.71 APPLICATION**

LDL Telecom Services, Inc. d/b/a Key Communications Services (“Key Communications”), pursuant to Section 214 of the Communications Act of 1934, as amended, (“the Act”), 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 63.71, hereby files this Application to discontinue the provision of domestic and international switchless long distance services in Michigan and Ohio. In support of the Application Key Communications submits the following:

**Name and Address of Carrier**

LDL Telecom Services, Inc.  
d/b/a Key Communications Services  
23 Lisbon Street, Suite M  
Canfield, OH 44406

Correspondence concerning this Application should be sent to:

Patrick D. Crocker  
Crocker & Crocker  
107 W Michigan Ave., 4<sup>th</sup> Floor  
Kalamazoo, MI 49007  
Phone: (269) 381-8893  
Fax: (269) 381-4855  
E-mail: [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com)

**Date of Planned Service Discontinuance**

Key Communications will discontinue providing long distance service on or after October 15, 2016, subject to regulatory approval.

### **Points of Geographic Areas of Service Affected**

Key Communications will discontinue service in Michigan and Ohio.

### **Brief Description of Type of Service Affected**

Key Communications is a switchless reseller of long distance service and will discontinue all long distance resale service.

### **Brief Description of the Dates and Methods of Notice to All Affected Customers**

Key Communications notified customers by letter sent via U.S. Mail on December August 22, 2016. A copy of the letter is attached hereto as Attachment A.

### **Regulatory Classification of Carrier**

Key communications is considered non-dominant with respect to the services to be discontinued.

### **Service**

In accordance with Section 63.71 of the Commission's rules, copies of the Application are being sent, first class U.S. Mail to the Governor of the State of Michigan, the Michigan Public Service Commission, the Governor of the State of Ohio, the Public Utilities Commission of Ohio, and the Special Assistant for Telecommunications to the Secretary of Defense.

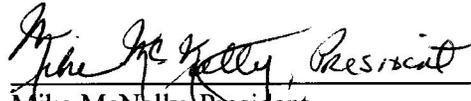
### **Circumstances of Discontinuance**

Key Communications has determined it is reasonable and necessary to revise its business plan and discontinue the provision of service, including switchless domestic and international long distance telecommunications resale services. The discontinuance of services to customers will not adversely affect the public convenience and necessity. Customers have been given notice that affords them ample opportunity to transfer to a new carrier. Key Communications has provided the minimum 30-day notice required by the Commission for discontinuance of domestic and international services.

**Conclusion**

Key Communications believes that the proposed discontinuance of service is reasonable and necessary. As outlined herein, Key Communications has taken all reasonable steps, to the extent it is able to assure that the discontinuance of service is not disruptive to the present or future public convenience and necessity. Key Communications respectfully requests that the Commission approve its Section 63.71 Application and permit it to discontinue the provision of services to customers in Michigan and Ohio.

Dated this 2<sup>ND</sup> day of Sept. 2016

  
Mike McNally, President  
LDL Telecom Services, Inc.  
d/b/a Key Communications Services

Patrick D. Crocker  
Crocker & Crocker  
107 W Michigan Ave, 4<sup>th</sup> Floor  
Kalamazoo, MI 49007  
Phone: (269) 381-8893  
Fax: (269) 381-4855  
Email: [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com)

**ATTACHMENT A**

**Customer Notice**



**NOTICE OF COMMUNICATION SERVICES DISCONTINUANCE**  
**DO NOT DISREGARD THIS NOTICE**

Sample Customer  
Mr. John Jones  
1234 Main Street  
Anytown OH 44444

8/17/2016

**Sample  
Letter**

RE: YOUR Account # 123456

Dear Key Communications Customer:

Since 2003, LDL Telecom Services, Inc., dba Key Communications Services has been providing long distance service in Ohio and Michigan. This letter is to inform you that Key Communications Services will discontinue providing long distance service on or after October 15, 2016, subject to regulatory approval.

**PLEASE NOTE THESE 2 IMPORTANT ITEMS:**

1. **Key Communications DOES NOT provide your local exchange services** – We provide to you ONLY Outbound (1+) and Toll-Free long distance service.
2. **You should take action now, and select a new long distance carrier as soon as possible to avoid any interruption of your long distance service.** Please check carefully to insure that ALL long distance services that Key Communications provides are moved to your new carrier. (Be sure to check both outbound long distance and toll-free service).

We've been proud and grateful to provide our service to you over these many years. To show our appreciation and assist you in moving your service, Key Communications has made "special arrangements" with Easton Telecom Services, Richfield, Ohio that will enable you to move your long distance from Key to Easton at the same long distance rate (in most cases) that you are enjoying with Key today. **ALSO - - Easton provides a complete and extremely competitive array of local exchange services which in most cases will result in significant savings on your LOCAL SERVICE as well.** You will definitely want to ask about Easton Local and Easton Digital Voice. Additionally, Easton will be a "One Stop" call for ALL your telecom and data needs to include VoIP and SIP Services. You should contact Easton at 1-800-222-8122, ask for Mr. Jim Butler and let him know you've been a Key Communications customer. We also setup a special email account to contact Easton for information. It is: [Key2Easton@eastontel.com](mailto:Key2Easton@eastontel.com)

The Federal Communications Commission ("FCC") permits customers to object to discontinuance of their service by a telecommunications provider, as provided in the FCC's rule 47 CFR 63.71:

*"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 not 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 your comments to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, D.C. 20554, and include in your comments a reference to the Section 63.71 Application of LDL Telecom Services, Inc., dba Key Communications Services. 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."*

Key Communications Service is pleased to have had the opportunity to serve you, and we are committed to making your service transition as smooth as possible. If you have any questions regarding discontinuance of our long distance services in Ohio and Michigan, please contact Key Communications Services Customer Service between 9:00 a.m. and 4:00 p.m. Monday thru Friday at 1-877-430-2777.

Sincerely.....and **Once Again, "Thanks for having been our customer"!**

Key Communications Customer Service

## **CERTIFICATE OF SERVICE**

I, Paula A. Schneider, do hereby certify that copies of the foregoing Section 63.71 Application were sent via first-class, postage prepaid, United States mail, the 6th day of September, 2016 to the following:

Michigan Public Service Commission  
P.O. Box 30221  
Lansing, MI 48909

Governor Rick Snyder  
Office of the Governor  
P.O. Box 30013  
Lansing, MI 48909

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3016

Governor John Kasich  
Office of the Governor  
Riffe Center, 30<sup>th</sup> Floor  
77 South High Street  
Columbus, OH 43215-6117

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

*Paula A. Schneider*

/s/ Paula A. Schneider