

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Section 63.71 Application of	)	File No.
	)	
BroadSoft Adaption, Inc.	)	
	)	
For Authority to Discontinue the Provision of	)	
Service	)	

**SECTION 63.71 APPLICATION**

BroadSoft Adaption, Inc. (“BroadSoft Adaption”) through its undersigned counsel and pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, hereby submits this application to discontinue the provision of voice services made available to customers of its BroadSoft Business suite of software services.

As required by Section 63.71(a) and (b) of the Commission’s rules, BroadSoft Adaption provides the following information in support of its application:

**1. Name and address of carrier**

BroadSoft Adaption, Inc.  
9737 Washingtonian Blvd.  
Gaithersburg, MD 20878

**2. Date of planned service discontinuance**

BroadSoft Adaption plans to no longer offer voice services to new BroadSoft Business customers, and to discontinue voice services to existing non-term BroadSoft Business customers, on November 14, 2018 subject to regulatory approval. For existing BroadSoft Business customers on term agreements that provide for the use of voice services, BroadSoft Adaption plans to discontinue voice services on November 14, 2018

or the expiration of the customer's term agreement, whichever is later. Existing term agreements will not be renewed or extended.

3. **Points of geographic areas of service affected**

BroadSoft Adaption proposes to discontinue voice services made available to BroadSoft Business customers in all U.S. states and the District of Columbia.

4. **Brief description of the type of service affected**

BroadSoft Business is a suite of cloud-based communications, collaboration, and contact center software services sold to enterprise customers. For some BroadSoft Business customers, BroadSoft Adaption provides voice services that allow end-users to make and receive VoIP calls over an existing broadband connection (which is not provided by BroadSoft Adaption) using IP-compatible equipment. These voice services are being discontinued.

5. **Brief description of the dates and methods of notice to all affected customers**

BroadSoft Adaption provided written notice to all affected customers on or before September 14, 2018. That written notice was delivered to customers by email, which is how BroadSoft Adaption generally delivers notices regarding its BroadSoft Business services. BroadSoft Adaption chose electronic delivery because it determined that it would inform its customers most effectively by using an established channel of communication. A copy of the customer notice is attached as Exhibit A.

6. **Whether the carrier is considered dominant or non-dominant with respect to the service to be discontinued**

BroadSoft Adaption is considered non-dominant with respect to the service to be discontinued.

7. **Other information**

BroadSoft Adaption's discontinuance of voice services made available to BroadSoft Business customers will not adversely affect the public convenience and necessity, and the public will not be harmed by the discontinuance. Customers have been given notice that affords them ample opportunity to acquire reasonable substitute service which is readily available from other providers.

Pursuant to Section 63.71 of the Commission's rules, BroadSoft Adaption is submitting a copy of this application via U.S. Mail to the public utility commissions and to the governors of all U.S. states and the District of Columbia, and to the Special Assistant for Telecommunications for the Secretary of Defense, concurrent with the filing of this application.

**CONCLUSION**

BroadSoft Adaption respectfully requests that the Commission approve this Section 63.71 application to discontinue the provision of voice services made available to its BroadSoft Business customers.

Respectfully submitted,



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*Counsel for BroadSoft Adaption, Inc.*

September 17, 2018

## **Exhibit A: Customer Notice**

Dear [CUSTOMER CONTACT FIRST NAME] [CUSTOMER CONTACT LAST NAME]:

BroadSoft Adaption, Inc. is sending this message to key contacts at [CUSTOMER] regarding important changes to your BroadSoft Business service.

This is an important notice about the discontinuance of voice services made available to you as a BroadSoft Business customer.

BroadSoft Adaption, Inc. has provided you with voice services that allow users under your subscription to place and receive VoIP calls to and from most telephone numbers. However, as we have previously notified you, BroadSoft Adaption intends to no longer offer, and to discontinue, these voice services in all U.S. states and the District of Columbia on November 14, 2018. If you are on a term agreement that provides for the use of these voice services, BroadSoft Adaption will continue to provide voice services until November 14, 2018 or the expiration of your term agreement, whichever is later. Existing term agreements for the provision of voice services will not be renewed or extended.

The Federal Communications Commission\* ("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 BroadSoft Adaption, 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.

We regret any inconvenience this may cause, and hope that you will continue to take advantage of other BroadSoft services in the future.

Sincerely,

BroadSoft Adaption, Inc.  
9737 Washingtonian Blvd.  
Gaithersburg, MD 20878

\* Note: The Federal Communications Commission (FCC) is an independent United States government agency. The FCC was established by the Communications Act of 1934 and is charged with regulating interstate and international communications by radio, television, wire, satellite and cable. The FCC's jurisdiction covers the 50 states, the District of Columbia, and U.S. possessions.

CERTIFICATE OF SERVICE

I, Alexandra Green, do hereby certify that I have caused the foregoing **SECTION 63.71 APPLICATION** to be:

- 1) Filed with the Secretary of the FCC via ECFS (INBOX—NON-DOCKETED FILING);
- 2) Served via first-class U.S. Mail, postage prepaid, on the Governors of the States listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commissions listed on the attached service list; and
- 4) Served via first-class U.S. Mail, postage prepaid, on the Special Assistant for Telecommunications under the Secretary of Defense at the address indicated on the attached service list.

/s/ Alexandra Green

Alexandra Green

Legal Assistant

Harris, Wiltshire & Grannis LLP

202.379.4504

[agreen@hwglaw.com](mailto:agreen@hwglaw.com)

September 17, 2018

## SERVICE LIST

The Hon. Kay Ivey  
Office of the Governor  
600 Dexter Avenue  
Montgomery, AL 36130

The Hon. William Walker  
Office of the Governor  
P.O. Box 110001  
Juneau, AK 99811

The Hon. Doug Ducey  
Office of the Governor  
Executive Tower  
1700 West Washington Street  
Phoenix, AZ 85007

The Hon. Asa Hutchinson  
Office of the Governor  
500 Woodlane Street  
Little Rock, AR 72201

The Hon. Edmund Brown  
Office of the Governor  
c/o State Capitol  
Suite 1173  
Sacramento, CA 95814

The Hon. John Hickenlooper  
Office of the Governor  
136 State Capitol  
Denver, CO 80203

The Hon. Dannel Malloy  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, CT 06106

The Hon. Muriel Bowser  
Office of the Mayor  
John A. Wilson Building  
1350 Pennsylvania Avenue NW  
Washington, DC 20004

The Hon. John Carney  
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150 Martin Luther King Jr. Blvd. South  
2<sup>nd</sup> Floor  
Dover, DE 19901

The Hon. Rick Scott  
Office of the Governor  
PL 05 The Capitol  
400 S. Monroe Street  
Tallahassee, FL 32399

The Hon. Nathan Deal  
Office of the Governor  
206 Washington Street  
111 State Capitol  
Atlanta, GA 30334

The Hon. David Ige  
Office of the Governor  
Executive Chambers  
State Capitol  
Honolulu, HI 96813

The Hon. C.L. Otter  
Office of the Governor  
700 West Jefferson Street  
2<sup>nd</sup> Floor  
Boise, ID 87320

The Hon. Bruce Rauner  
Office of the Governor  
State Capitol  
207 State House

Springfield, IL 62706  
The Hon. Eric Holcomb  
Office of the Governor  
200 Washington Street  
Room 206  
Indianapolis, IN 46204

The Hon. Charlie Baker  
Office of the Governor  
Massachusetts State House  
24 Beacon Street  
Room 280  
Boston, MA 02133

The Hon. Kim Reynolds  
Office of the Governor  
State Capitol  
1007 East Grand Avenue  
Des Moines, IA 50319

The Hon. Rick Snyder  
Office of the Governor  
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The Hon. Mark Dayton  
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The Hon. Phil Bryant  
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Jackson, MS 39205

The Hon. John Bel Edwards  
Office of the Governor  
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Baton Rouge, LA 70804

The Hon. Mike Parson  
Office of the Governor  
P.O. Box 720  
Jefferson City, MO 65102

The Hon. Paul LePage  
Office of the Governor  
#1 State House Station  
Augusta, ME 04333

The Hon. Steve Bullock  
Office of the Governor  
P.O. Box 200801  
Helena, MT 59620

The Hon. Larry Hogan  
Office of the Governor  
100 State Circle  
Annapolis, MD 21401

The Hon. Pete Ricketts  
Office of the Governor  
P.O. Box 94848  
Lincoln, NE 68509



The Hon. Brian Sandoval  
Office of the Governor  
State Capitol Building  
101 N. Carson Street  
Carson City, NV 89701

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

The Hon. Chris Sununu  
Office of the Governor  
State House  
107 North Main Street  
Concord, NH 03301

The Hon. Mary Fallin  
Office of the Governor  
Oklahoma State Capitol  
2300 N. Lincoln Blvd.  
Room 212  
Oklahoma City, OK 73105

The Hon. Phil Murphy  
Office of the Governor  
The State House  
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Trenton, NJ 08625

The Hon. Kate Brown  
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Suite 254  
Salem, OR 97301

The Hon. Susana Martinez  
Office of the Governor  
490 Old Santa Fe Trail  
Room 400  
Santa Fe, NM 87501

The Hon. Tom Wolf  
Office of the Governor  
508 Main Capitol Building  
Harrisburg, PA 17120

The Hon. Andrew Cuomo  
Office of the Governor  
NYS State Capitol Building  
Albany, NY 12224

The Hon. Gina Raimondo  
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Providence, RI 02903

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20301 Mail Service Center  
Raleigh, NC 27699

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Bismarck, ND 58505

The Hon. Dennis Daugaard  
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500 East Capitol Avenue  
Pierre, SD 57501

The Hon. Bill Haslam  
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1<sup>st</sup> Floor  
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Suite 200  
Salt Lake City, UT 84114

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Office of the Governor  
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Montpelier, VT 05609

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Office of the Governor  
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Olympia, WA 98504

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State Capitol  
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Charleston, WV 25305

The Hon. Scott Walker  
Office of the Governor  
P.O. Box 7863

Madison, WI 53707  
The Hon. Matthew Mead  
Office of the Governor  
Idelman Mansion  
2323 Carey Avenue  
Cheyenne, WY 82002

Alabama Public Service Commission  
P.O. Box 304260  
Montgomery, AL 36130

Regulatory Commission of Alaska  
701 West 8<sup>th</sup> Avenue  
Suite 300  
Anchorage, AK 99501-3469

Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007-2996

Arkansas Public Service Commission  
P.O. Box 400  
Little Rock, AR 72203-0400

California Public Utilities Commission  
California State Building  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Colorado Public Utilities Commission  
1560 Broadway  
Suite 250  
Denver, CO 80202

Connecticut Public Utilities Reg. Authority  
10 Franklin Square  
New Britain, CT 06051

Public Service Commission of D.C.  
1325 G. Street NW  
Suite 800  
Washington, DC 20005

Delaware Public Service Commission  
Cannon Building  
861 Silver Lake Blvd.  
Suite 100  
Dover, DE 19904

Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Georgia Public Service Commission  
244 Washington Street SW  
Atlanta, GA 30334-9052

Hawaii Public Utilities Commission  
Kekuanao'a Building  
465 South King Street  
Room 103  
Honolulu, HI 96813

Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

Indiana Utility Regulatory Commission  
PNC Center  
101 West Washington Street  
Suite 1500 East  
Indianapolis, IN 46204

Iowa Utilities Board  
1375 E. Court Avenue  
Des Moines, IA 50319-0069

Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
Topeka, KS 66604-4027

Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602-0615

Louisiana Public Service Commission  
P.O. Box 91154  
Baton Rouge, LA 70821-9154

Maine Public Utilities Commission  
18 State House Station  
Augusta, ME 04333-0018

Maryland Public Service Commission  
6 St. Paul Street  
16<sup>th</sup> Floor  
Baltimore, MD 21202-6806

Massachusetts Department of Public Utilities  
One South Station  
5<sup>th</sup> Floor  
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Lansing, MI 48909

Minnesota Public Utilities Commission  
121 Seventh Place East  
Suite 350

St. Paul, MN 55101-2147  
Mississippi Public Service Commission  
Woolfolk State Office Building  
501 North West Street  
Jackson, MS 39201

Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Montana Public Service Commission  
P.O. Box 202601  
Helena, MT 59620-2601

Nebraska Public Service Commission  
1200 N Street  
Suite 300  
Lincoln, NE 68508

Public Utilities Commission of Nevada  
1150 East William Street  
Carson City, NV 89701-3109

New Hampshire Public Utilities Commission  
21 South Fruit Street  
Suite 10  
Concord, NH 03301-2429

New Jersey Board of Public Utilities  
44 S. Clinton Avenue  
Trenton, NJ 08625

New Mexico Public Regulation Commission  
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Santa Fe, NM 87504

New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

North Carolina Utilities Commission  
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Raleigh, NC 27699-4300

North Dakota Public Service Commissions  
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Bismarck, ND 58505-0480

Public Utilities Commission of Ohio  
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Columbus, OH 43215-3793

Oklahoma Corporation Commission  
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Oklahoma City, OK 73152-2000

Oregon Public Utility Commission  
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Salem, OR 97301

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Tennessee Public Utility Commission  
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4<sup>th</sup> Floor  
Nashville, TN 37243

Wyoming Public Service Commission  
2515 Warren Avenue  
Suite 300  
Cheyenne, WY 82002

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

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

Public Service Commission of Utah  
160 East 300 South  
4<sup>th</sup> Floor  
Salt Lake City, UT

Vermont Public Utility Commission  
112 State Street  
4<sup>th</sup> Floor  
Montpelier, VT 05620-2701

Virginia State Corporation Commission  
1300 East Main Street  
Richmond, VA 23219

Washington Utilities and Transportation  
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