

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

In the Matter of	)	
	)	
Section 63.63 Application of	)	
AT&T Corp.	)	
Pacific Bell Telephone Company	)	
SBC Long Distance, LLC	)	File No.
Teleport Communications America, LLC	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, As Amended,	)	
To Discontinue the Provision of Service	)	

**SECTION 63.63 APPLICATION OF AT&T**

AT&T Services, Inc. on behalf of its affiliates AT&T Corp., Pacific Bell Telephone Company d/b/a AT&T California, SBC Long Distance, LLC d/b/a AT&T Long Distance and Teleport Communications America, LLC, collectively referenced herein as “AT&T,” seeks emergency authorization under Section 214(a) of the Communications Act, as amended (“the Act”), 47 U.S.C. § 214, and Section 63.63 of the Federal Communications Commission’s (“Commission”) rules, to suspend AT&T’s interstate telecommunications services until services can be restored.

As required by Section 63.63(a) of the Commission’s rules, AT&T provides the following information:

**(1) The effective date of such discontinuance, reduction, or impairment, and the identification of the service area affected;**

AT&T’s services were discontinued between July 23, 2018 and August 4, 2018 as the Carr Fire spread across the Shasta and Trinity county in Northern California.

**(2) The nature and estimated duration of the conditions causing the discontinuance, reduction, or impairment;**

As noted above, on Monday, July 23, 2018, the Carr Fire started at the intersection of Highway 299 and Carr Powerhouse Road, in the Whiskeytown district of the Whiskeytown–Shasta–Trinity National Recreation Area, in Shasta County, California. On July 26, 2018, the fire jumped the Sacramento River, spreading towards the city of Redding.<sup>1</sup> By the evening of July 26th, the fire had burned 28,763 acres and was only 10 percent contained.<sup>2</sup>

On August 4th, California Governor Jerry Brown announced federal approval of Presidential Major Disaster Declaration for Shasta County.<sup>3</sup> By August 30th, the Carr fire was reported to be 100% contained after 229,651 acres were damaged, 1079 residential structures were destroyed, 190 residential structures were damaged, 22 commercial structures were destroyed, and damaging 26 commercial structures.<sup>4</sup>

AT&T has 2 Central Offices (COs) in the counties affected by the fires. The areas served by both COs were burned, which includes 93 Distribution Areas (DAs). After assessing these 93 DAs in the field, AT&T determined that its facilities in 39 DAs had no damage; the facilities in 22 DAs were able to be restored repaired and restored almost immediately; and the facilities in 32 DAs incurred damage requiring more complex restoration plans. Of those 32 DAs, service has been restored in 19 DAs. AT&T's Outside

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<sup>1</sup> *Carr Fire - Incident Update*, CALFIRE, State of California (August 30, 2018).

<sup>2</sup> *Redding residents making emergency evacuations as Carr Fire jumps the Sacramento River*, Sam Morgan, Kellen Stanton, and Claire Browning, *The Sacramento Bee* (July 26, 2018).

<sup>3</sup> State of California, “*Governor Brown announces federal approval of presidential major disaster declaration for Shasta County*,” [www.gov.ca.gov](http://www.gov.ca.gov).

<sup>4</sup> *See supra* note 1; *see also* Public Information Map, Carr Fire, CA-SHU-007808 (August 21, 2018) (Attachment A).

Plant Construction and Engineering personnel remain on sight and continue their work to restore service in the remaining 13 DAs.<sup>5</sup>

**(3) The facts showing that such conditions could not reasonably have been foreseen by the carrier in sufficient time to prevent such discontinuance, reduction, or impairment;**

As noted above, the discontinuance of service was caused by wildfires that were believed to have been started accidentally by a vehicle towing a dual-axle travel trailer. “One of the tires on the trailer blew out, causing the steel rim to scrape along the pavement, generating sparks that ignited dry vegetation along the edge of the highway”.<sup>6 7</sup> Wind caused the fire to spread quickly. Hot conditions and steep, inaccessible terrain presented challenges for fire crews as they strengthened containment lines.<sup>8</sup>

**(4) A description of the services involved;**

AT&T provides numerous residential and business interstate voice, private line, data and video services in this area.<sup>9</sup>

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<sup>5</sup> In the event of disasters that prompt the triggering of a disaster recovery plan, the Commission granted AT&T a limited waiver (of up to 180 days) of the advanced notification and waiting period requirements contained in its network disclosure rules (47 C.F.R. §§ 51.325-335) so as to allow AT&T to concentrate on restoration efforts. *See Petition of BellSouth Corporation for Special Temporary Authority and Waiver to Support Disaster Planning and Response, Order*, 21 FCC Rcd 6518 (2006). AT&T has been undertaking emergency restoral activities pursuant to this waiver. Once restoral assessments are completed, AT&T will file the relevant network change notifications associated with network changes that were a direct result of damage to the AT&T network infrastructure caused by the fires.

<sup>6</sup> *Letters Pour In Supporting Couple Whose Trailer May Have Sparked Carr Fire*, Golgowski, Nina, HuffPost (August 15, 2018).

<sup>7</sup> *Carr Fire in California is so hot it's creating its own weather system*, Chavez, Nicole, CNN (July 29, 2018).

<sup>8</sup> *Incident fact sheet*, CALFIRE, State of California (July 25, 2018).

<sup>9</sup> *See* AT&T Corp. Service Publications: AT&T Corp. Tariff F.C.C. No. 2 (Access Services), AT&T Corp. Tariff F.C.C. No. 4 (Business Telecommunications Services), AT&T Business Service Guide, AT&T F.C.C. Tariff No. 3 (AT&T Consumer Services), AT&T Interstate Consumer Service Guides; AT&T California Service Publications: Tariff F.C.C. No. 1 – Access Services, Tariff F.C.C. No. 2 – Special Construction, AT&T Interstate Access Guidebook, AT&T Interstate/IntraLATA Toll Services Guidebook, AT&T Switched Ethernet Service Guide; SBC Long Distance, LLC Service Publications: Tariff F.C.C. No. 18, Tariff F.C.C. No. 19, Voice Product Reference and Pricing Guidebook for Interexchange, Interstate and

**(5) The nature of service which will be available or substituted;**

AT&T plans to restore services to all areas it served before the wildfires. AT&T is deploying a variety of technologies and configurations in an effort to restore services in an expedited fashion, and is concurrently deploying long-term restoral solutions. AT&T will update the Commission, as needed, if it determines that it will discontinue offering any of its existing services.

**(6) The effect upon rates to any person in the community;**

AT&T is unaware of any effect this suspension may have upon rates to any person in the community.

**(7) The efforts made and to be made by applicant to restore the original service or establish comparable service as expeditiously as possible.**

AT&T is restoring its facilities in the areas impacted by the wildfires and related events based on location and/or customer access. AT&T has replaced and/or repaired (where possible) existing facilities that served structures that were salvageable.

**Conclusion:**

AT&T respectfully requests that the Commission grant AT&T's Section 63.63 Application to suspend AT&T's interstate services where its facilities were damaged in California until these facilities can be rebuilt and services restored as discussed above.

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International Services, Data Product Reference and Pricing Guidebook (Interstate and International Services); Teleport Telecommunications America, LLC Service Publications: AT&T Business Service Guide, Teleport Communications Group Operating Companies Tariff, F.C.C. Tariff No. 2 (Access Services).



Respectfully submitted,

By: /s/ Terri L. Hoskins

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*Its Attorneys*

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# ATTACHMENT A



