



Frederick E. Moacdieh
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September 29, 2017

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

Re: Section 63.71 Application of Verizon Delaware LLC, Verizon Maryland LLC, Verizon New England Inc., Verizon New Jersey Inc., Verizon New York Inc., Verizon Pennsylvania LLC, and Verizon Virginia LLC

Dear Ms. Dortch:

The Verizon incumbent local exchange companies captioned above submit the enclosed Application for authority under Section 214(a) of the Communications Act and 47 C.F.R. § 63.71 to discontinue four legacy interstate DS0 services in multiple wire centers. These legacy voice and low-speed data services are Voice Grade Service, WATS Access Line Service, Digital Data Service, and DIGIPATH Digital Service II. A list of affected wire centers is included in the Application at Exhibit A.

Sincerely

A handwritten signature in black ink, appearing to be "Frederick E. Moacdieh".

Enclosure

cc: Department of Defense Chief Information Officer
Governor of Each Impacted State
Public Utilities Commission of Each Impacted State

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

In the Matter of)
)
Section 63.71 Application of)
Verizon Delaware LLC,)
Verizon Maryland LLC,)
Verizon New England Inc.,)
Verizon New Jersey Inc.,) File No. _____
Verizon New York Inc.,)
Verizon Pennsylvania LLC, and)
Verizon Virginia LLC)
)
For Authority Pursuant to Section 214 of)
the Communications Act of 1934, As)
Amended, To Discontinue the Provision of)
Service)

**SECTION 63.71 APPLICATION OF
VERIZON INCUMBENT LOCAL EXCHANGE COMPANIES**

The Verizon incumbent local exchange companies captioned above (collectively “Verizon”) submit this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission’s rules to grandfather and discontinue four legacy interstate DS0 services in multiple wire centers.¹ Today, there are relatively few customers still using these products, as customers continue to migrate away from these older services toward more modern options. Given the low numbers of subscribers and high costs of supporting these services, we plan to grandfather these services on or after January 31, 2018, in the specified wire centers. At that time, no new customers will be added but existing customers will be permitted to continue to submit orders for moves, adds, and changes. We plan to stop permitting or

¹ These legacy voice grade and low-speed data services are Voice Grade Service, WATS Access Line Service, Digital Data Service, and DIGIPATH Digital Service II. A list of the affected wire centers is included at Exhibit A.

accepting orders for moves, adds, or changes on or after July 17, 2018; we plan to discontinue the services completely on or after December 31, 2018.²

Customers in these areas are being migrated to all-fiber facilities in a multi-stage process. Many customers have already made the decision to move either to our fiber-based services or to competitors' services; others are in the process of transitioning. During this transition, we have been working closely with our customers receiving service over copper facilities to discuss their existing services and their needs going forward. For the vast majority of our customers, there has been a like-for-like, fiber-based service available for them, making this transition straightforward. This is the case for customers purchasing plain old telephone service ("POTS") from us. These POTS customers will continue to receive the same POTS over fiber at the same or better price, and there is no change in the underlying features and functionalities in their service. For those customers purchasing broadband Internet services over copper facilities, Fios Internet will provide them far more than they are getting today. Notwithstanding the greater speed and reliability they will experience, our offerings for these customers will also include comparable pricing. Similarly, customers can continue to buy DS1 level services as they do today, just over the more reliable fiber network.³

However, there are a small number of legacy interstate special access services – Voice Grade Service, WATS Access Line Service, Digital Data Service ("DDS"), and DIGIPATH Digital Service II – which no longer serve a substantial need for the majority of our customers. These services are outdated legacy voice grade and data transmission services that have largely

² Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

³ Higher bandwidth services are today already regularly provisioned over fiber facilities and customers will continue to be able to buy them.

fallen out of favor as customers have chosen new options and technologies. Today we have approximately 10 wholesale customers and approximately 67 retail customers on these services in the affected areas. Given the decreased demand for these outdated offerings, we plan to grandfather these services on or after January 31, 2018, preventing new customers from ordering them. At that time, existing customers may continue to submit orders for moves, adds or changes. We plan to stop permitting or accepting orders for moves, adds, or changes on or after July 17, 2018, and to discontinue the services on or after December 31, 2018.

Consistent with Section 63.71(a) and (b) of the Commission's rules, Verizon provides the following information:

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

Verizon Delaware LLC
901 Tatnall Street
Wilmington, DE 19801

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon New England Inc.
6 Bowdoin Square
9th Floor
Boston, MA 02114

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

Verizon New Jersey Inc.
One Verizon Way
Basking Ridge, NJ 07920

2. Date of Planned Service Discontinuation (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization, on or after January 31, 2018, Verizon will stop accepting orders from new customers for Voice Grade Service, WATS Access Line Service,

Digital Data Service, and DIGIPATH Digital Service II in the affected wire centers.⁴ At that time, existing customers may continue to submit orders for moves, adds or changes. We plan to stop permitting or accepting orders for moves, adds, or changes on or after July 17, 2018, and to discontinue the services on or after December 31, 2018.

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

Subject to the Commission's authorization, Verizon intends to discontinue the aforementioned services in the wire centers listed in Exhibit A.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

The services at issue here are all legacy voice grade and very low-speed data transmission services. Specifically, the four services here are:

Voice Grade Service uses dedicated lines to provide voice frequency transmission capability for connecting location-to-location or to the public network. Voice Grade Service terminations transmit in the nominal frequency range of 300 to 3000 Hz. It may be terminated as analog two-wire or four-wire. Voice Grade channels are provided between customer-designated premises or between a customer-designated premise and a Verizon hub. Voice Grade Service is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.3.

WATS Access Line Service provides voice frequency transmission capability for toll free calling in a limited geographic area. The service provides a customer-premise-to-customer-premise connection with the combination of WATS Access Connection, a dedicated channel between the customer's end user's premises and a WATS Serving Office equipped with a

⁴ Please see Exhibit A for a list of the affected wire centers. Subject to the Commission's authorization, Verizon intends to file tariff revisions to effectuate the changes requested in this application.

Switched Access Service arrangement. WATS Access Line Service is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.10.

Digital Data Service provides duplex transmission of synchronous serial data at 2.4, 4.8, 9.6, or 56 Kbps. The actual bit rate is a function of the channel interface selected by the customer. Digital Data Service is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.8.

DIGIPATH Digital Service II is a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56, or 64 Kbps. The actual bit rate is a function of the channel interface selected by the customer. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.11.

Alternative Services and Products: Customers today can obtain alternative services and products from Verizon or other providers that perform the same functions as these services. Verizon's alternative wholesale products and services include Wholesale Advantage or Resale, Fiber to the Internet Service, Transparent LAN Service ("TLS"), Private Internet Protocol Service, and DS1 Service. Verizon's alternative retail products and services include fiber-based voice services, Fios Internet, Switched Ethernet Service, Private Internet Protocol Service, DS1 services, machine-to-machine services, and LTE. Verizon will work with affected customers to find suitable alternative solutions.

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

Verizon sent notices to customers that currently subscribe to the affected services by U.S. Mail on or before September 29, 2017. Copies of the notices are attached as Exhibit B.

Verizon is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state as well as to the Department of Defense Chief Information Officer, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Verizon is classified for regulatory purposes under the Commission's rules as dominant with respect to the services to be discontinued.

CONCLUSION

Verizon respectfully requests that the Commission approve this Application.

Respectfully submitted,



William H. Johnson
Of Counsel

Katharine R. Saunders
Roy E. Litland
Verizon
1300 I St NW, Suite 500E
Washington, DC 20005-7101
(202) 515-2464 (Office)

September 29, 2017

CERTIFICATE OF SERVICE

I hereby certify that on or before this twenty-ninth day of September 2017, I caused to be served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

Roy Litland

Roy E. Litland

SERVICE LIST

Donna Nickerson, Secretary
Delaware Public Service Commission
Cannon Building, Suite 100
861 Silver Lake Boulevard
Dover, DE 19904

The Honorable John Carney
Office of the Governor
150 Martin Luther King Jr. Blvd. South
2nd Floor
Dover, DE 19901

Karen Charles Peterson - Commissioner
Massachusetts Department of
Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

The Honorable Charlie Baker
Office of the Governor
Room 280
Boston, MA 02133

David Collins - Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, MD 21202-6806

The Honorable Larry Hogan
Office of the Governor
State House
100 State Circle
Annapolis, MD 21401-1925

Irene Kim Asbury - Secretary
New Jersey Board of Public Utilities
44 S. Clinton Avenue
3rd Floor, Suite 314
Trenton, NJ 08625-0350

The Honorable Chris Christie
Office of the Governor
P.O. Box 001
Trenton, NJ 08625

Honorable Kathleen H. Burgess
Secretary to the Commission
New York Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo
Governor of New York
NYS State Capitol Building
Albany, NY 12224

Secretary's Bureau
Pennsylvania Public Utility
Commission
400 North Street
2nd Floor, Room N201
Harrisburg, PA 17120

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

Office of the Clerk
Virginia State Corporation Commission
Joel H. Peck
P.O. Box 2118
Richmond, VA 23218

Governor Terence R. McAuliffe
Patrick Henry Building
1111 E. Broad Street
Richmond, VA 23219

Department of Defense
Chief Information Officer
Attn: Military Asst/Mobility Team
The Pentagon
Washington, DC 20301

EXHIBIT A

State	Wire Center
DE	Newark
MA	Dorchester
MA	Hanover
MA	Hyde Park
MA	Leominster
MA	Marblehead
MA	North Chelmsford
MA	Roxbury
MA	Stoughton
MA	W Roxbury
MD	Columbia
MD	Glen Burnie
MD	Rockville
MD	Towson
NJ	Berlin
NJ	Cape May Courthouse
NJ	East Dover
NJ	East Orange
NJ	Ewing
NJ	Freehold
NJ	Marlton
NJ	Mays Landing
NJ	Medford
NJ	Merchantville
NJ	Red Bank

State	Wire Center
NJ	Somerville
NJ	Toms River
NJ	Union City
NJ	Wall
NJ	Woodbury
NY	Cayuga Williamsville
NY	Cornwall
NY	Mineola
NY	Mount Vernon
NY	Plainview
NY	Skaneateles
NY	West Seneca Union
PA	Allentown (Pitt)
PA	Dormont (Pitt)
PA	Glenolden
PA	Jefferson
PA	Knights Rd
PA	Turtle Creek
PA	Wilkinsburg
VA	Fox Mill Road
VA	Great Neck Rd
VA	Indian Lakes
VA	Merrifield
VA	Rich - Stuart Avenue

EXHIBIT B



Verizon
One Verizon Way,
VC22W464
Basking Ridge, NJ 07920

September 29, 2017

Business Name
Billing address 1
Billing Address 2
Billing Address 3
City, State Zip

RE: Discontinuation of FCC Special Access DS0 Services

Dear Valued Customer,
Account Number:

Verizon is in the process of upgrading select wire centers from copper to all-fiber facilities. (Please see **Attachment 1** for the list of offices.) As part of that program we must take steps to limit the number of circuits that are provisioned over the existing copper infrastructure. To that end, we plan to grandfather and eventually discontinue the following Interstate Special Access services in these locations:

Voice Grade Service which provides voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz. Voice Grade Service is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.3.

WATS Access Line Service which provides voice frequency transmission capability for toll-free calling in a limited geographic area. WATS Access Line Service is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.10.

Digital Data Service which provides duplex transmission of synchronous serial data at the rate of 2.4, 4.8, 9.6, 56 kbps. Digital Data Service is further described in Verizon's FCC Tariff No.11, Sec. 7.2.8.

DIGIPATH Digital Service II which provides a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56 or 64 kbps. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No.11, Sec 7.2.11.

According to our records, you currently subscribe to one of the services referenced above.

This letter is being sent to inform you of our plans for service discontinuation and urge you to begin making arrangements to migrate applications that use these services to an alternative service or carrier.

On or after January 31, 2018, subject to approval from the FCC, Verizon will stop accepting orders from *new* customers for these services if the circuit requested will originate or terminate in an Attachment 1 office.

Customers, who already subscribe to these services may retain their service and conduct circuit moves, additions and changes through the first half of 2018.

On or after July 17, 2018, again subject to FCC approval, *existing* subscribers will no longer be able to purchase additional circuits for these services if they will originate or terminate in one of these offices. Moves and changes to existing circuits will also not be allowed. In addition, no service term-commitments will be renewed or extended.

Verizon will begin disconnection of these circuits on or after **December 31, 2018**, again subject to FCC approval. The timing for disconnection of *your* service(s) will depend on our schedule for completing the fiber-optic transition in your area. Verizon will provide you 90 days advance notice of the actual date for your service disconnection.

Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

Please use this interim period to review the application(s) for which you are currently using the aforementioned services and determine what alternative service or carrier you may wish to migrate these applications to, prior to the disconnect of your current service. We are happy to work with you to find alternative solutions. Verizon offers several alternatives to these services that may suit your needs, including:

- *Fiber-based voice services*
- *Fios Internet Service*
- *Switched Ethernet Service*
- *Private Internet Protocol Service*
- *DS1 Service*
- *Machine-to-Machine Services through Verizon or Verizon Partner Program*
- *LTE*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you. Please contact your Verizon Account Manager to discuss alternative solutions.

Sincerely,
Verizon

On behalf of:

Verizon Delaware LLC
901 Tatnall Street
Wilmington, DE 19801

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon New England Inc.
6 Bowdoin Square
9th Floor
Boston, MA 02114

Verizon New Jersey Inc.
One Verizon Way
Basking Ridge, NJ 07920

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) 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 Verizon Delaware LLC; Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon New Jersey Inc.; Verizon Pennsylvania LLC; and Verizon Virginia LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

ATTACHMENT 1

State	Wire Center
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DE	Newark
MA	Dorchester
MA	Hanover
MA	Hyde Park
MA	Leominster
MA	Marblehead
MA	North Chelmsford
MA	Roxbury
MA	Stoughton
MA	W Roxbury
MD	Columbia
MD	Glen Burnie
MD	Rockville
MD	Towson
NJ	Berlin
NJ	Cape May Courthouse
NJ	East Dover
NJ	East Orange
NJ	Ewing
NJ	Freehold
NJ	Marlton
NJ	Mays Landing
NJ	Medford
NJ	Merchantville
NJ	Red Bank

State	Wire Center
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NJ	Somerville
NJ	Toms River
NJ	Union City
NJ	Wall
NJ	Woodbury
NY	Cayuga Williamsville
NY	Cornwall
NY	Mineola
NY	Mount Vernon
NY	Plainview
NY	Skaneateles
NY	West Seneca Union
PA	Allentown (Pitt)
PA	Dormont (Pitt)
PA	Glenolden
PA	Jefferson
PA	Knights Rd
PA	Turtle Creek
PA	Wilkinsburg
VA	Fox Mill Road
VA	Great Neck Rd
VA	Indian Lakes
VA	Merrifield
VA	Rich - Stuart Avenue



Verizon
One Verizon Way,
VC22W464
Basking Ridge, NJ 07920

September 29, 2017

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Verizon will begin disconnection of these circuits on or after **December 31, 2018**, again subject to FCC approval. The timing for disconnection of *your* service(s) will depend on our schedule for completing the fiber-optic transition in your area. Verizon will provide you 90 days advance notice of the actual date for your service disconnection.

Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

Please use this interim period to review the application(s) for which you are currently using the aforementioned services and determine what alternative service or carrier you may wish to migrate these applications to, prior to the disconnect of your current service. We are happy to work with you to find alternative solutions. Verizon offers several alternatives to these services that may suit your needs, including:

- *Wholesale Advantage or Resale*
- *Fiber to the Internet Service*
- *Transparent LAN Service (TLS)*
- *Private Internet Protocol Service*
- *DS1 Service*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you. Please contact your Verizon Account Manager to discuss alternative solutions.

Sincerely,
Verizon

On behalf of:

Verizon Delaware LLC
901 Tatnall Street
Wilmington, DE 19801

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon New England Inc.
6 Bowdoin Square
9th Floor
Boston, MA 02114

Verizon New Jersey Inc.
One Verizon Way
Basking Ridge, NJ 07920

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) 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 Verizon Delaware LLC; Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon New Jersey Inc.; Verizon Pennsylvania LLC; and Verizon Virginia LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

ATTACHMENT 1

State	Wire Center
--------------	--------------------

DE	Newark
MA	Dorchester
MA	Hanover
MA	Hyde Park
MA	Leominster
MA	Marblehead
MA	North Chelmsford
MA	Roxbury
MA	Stoughton
MA	W Roxbury
MD	Columbia
MD	Glen Burnie
MD	Rockville
MD	Towson
NJ	Berlin
NJ	Cape May Courthouse
NJ	East Dover
NJ	East Orange
NJ	Ewing
NJ	Freehold
NJ	Marlton
NJ	Mays Landing
NJ	Medford
NJ	Merchantville
NJ	Red Bank

State	Wire Center
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NJ	Somerville
NJ	Toms River
NJ	Union City
NJ	Wall
NJ	Woodbury
NY	Cayuga Williamsville
NY	Cornwall
NY	Mineola
NY	Mount Vernon
NY	Plainview
NY	Skaneateles
NY	West Seneca Union
PA	Allentown (Pitt)
PA	Dormont (Pitt)
PA	Glenolden
PA	Jefferson
PA	Knights Rd
PA	Turtle Creek
PA	Wilksburg
VA	Fox Mill Road
VA	Great Neck Rd
VA	Indian Lakes
VA	Merrifield
VA	Rich - Stuart Avenue