

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

In the Matter of	)	
	)	
Section 63.63 Application of	)	
AT&T Corp.	)	File No.
BellSouth Long Distance, Inc.	)	
BellSouth Telecommunications, LLC	)	
SBC Long Distance	)	
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., BellSouth Long Distance, Inc., BellSouth Telecommunications, LLC, SBC 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 on September 10, 2017 after Hurricane Irma made landfall in the Lower Keys of Florida as a Category 4 hurricane. The storm surge was 7-10 feet above ground level and caused significant flooding in the area. The storm

continued for several days and traveled north along the western coast of Florida, into Georgia and Alabama. AT&T's facilities in the following counties sustained significant damage and will require additional time to completely restore services: Monroe, Miami-Dade, Broward, Palm Beach, and Martin.

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

As noted above, Hurricane Irma made landfall on September 10, 2017 destroying many facilities in its path such as buildings, utility poles, aerial cable (both electric and telecommunications), and street signs. In addition, the storm surge from the hurricane caused severe flooding in surrounding areas and caused secondary damage to AT&T equipment that remained under both salt and fresh water for many days. On September 10, 2017, President Trump declared this event a national disaster.<sup>1</sup> On September 13, 2017, AT&T notified the Florida Public Service Commission that it declared a force majeure event as a result of the hurricane.

AT&T's Outside Plant Construction and Engineering personnel have been on site in the affected areas and continue to restore service to customers where the damaged facilities are repairable. AT&T continues to provide service to customers where its facilities were not damaged. However, due to the severe devastation in some areas in Big Pine, Sugarloaf, Arch Creek and Poinciana, AT&T's copper facilities were irreparably damaged, and AT&T is implementing plans to provide the best and most efficient service restoral plans for these areas.<sup>2</sup>

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<sup>1</sup> See FEMA, Florida Hurricane Irma (DR-4337), <https://www.fema.gov/disaster/4337>.

<sup>2</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

**(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 hurricane and severe flooding, which was completely beyond AT&T's control.

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

AT&T provides numerous residential and business interstate voice services, interstate private line and data services, as well as interstate switched access services in this area.<sup>3</sup>

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

AT&T plans to restore services and provide innovative voice and data services to this community. AT&T is implementing its plans to have the new facilities in place as quickly as possible. In the areas that sustained complete destruction, AT&T will provide solutions and services based on the demand and the timing required for those areas.

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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 hurricane.

<sup>3</sup> See AT&T Corp. Service Publications: AT&T Business Service Guide, Tariff F.C.C. No. 3 Consumer Telecommunications Service, Domestic Service Guides, F.C.C. Tariff No. 2, F.C.C. Tariff No. 4; BellSouth Long Distance, Inc. Service Publications: Residential Service Guide, Business Service Guide, F.C.C. Tariff No. 3, F.C.C. Informational Tariff; BellSouth Telecommunications, LLC d/b/a AT&T Florida Service Publications: Tariff F.C.C. No. 1 – Access Services; Tariff F.C.C. No. 2 – Special Construction; Tariff F.C.C. No. 3 – Radiotelephone Message Telecommunications Service and Tariff F.C.C. No. 4 – Interstate IntraLATA Long Distance Message Telecommunications Service; SBC Long Distance Service Publications: Tariff F.C.C. No. 18, Tariff F.C.C. No. 19, Voice Product Reference and Pricing Guidebook for Interexchange, Interstate and International Service; Teleport Telecommunications America, LLC Service Publications: AT&T Business Service Guide, F.C.C. Tariff No. 2.

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 Hurricane 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 the above-referenced counties in Florida until these services can be rebuilt as discussed above.

Respectfully submitted,

By: /s/ Terri L. Hoskins

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