

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

In the Matter of)	
)	
Section 63.63 Application of)	
AT&T Corp.)	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., 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 20, 2017 after Hurricane Maria made landfall in Yabucabo, Puerto Rico as a Category 4 storm.

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

As noted above, Hurricane Maria made landfall on September 20, 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. Detailed field assessments after the storm revealed that approximately 95% of AT&T's exposed aerial outside plant assets were completely destroyed or severely damaged. On September 20, 2017, President Trump declared this event a national disaster.¹

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.²

(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 a 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, private line, data and video services in this area.³

¹ See FEMA, Florida Hurricane Maria (DR-4339), <https://www.fema.gov/disaster/notices/initial-notice-26>.

² 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 hurricane.

³ See AT&T Corp. Service Publications: AT&T Business Service Guide, Tariff F.C.C. No. 3 Consumer Telecommunications Service, F.C.C. Tariff No. 4 Business Telecommunications

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

AT&T plans to restore services to all areas it served before Hurricane Maria. 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 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 Puerto Rico until these services can be rebuilt as discussed above.

Respectfully submitted,

By: /s/ Terri L. Hoskins

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