

**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 October 8 – 31, 2017 as twenty-one fires spread across five counties in Northern California.

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

As noted above, on Sunday, October 8, 2017, high winds and multi-year drought conditions created the environment for wildfires of unknown origin. These conditions created a conflagration that spread, creating 21 fires, which caused major damage and loss of life in five counties of Northern California: Napa, Solano, Sonoma, Lake, and Mendocino. It is estimated that 320,000 acres burned, which destroyed or damaged at least 8,700 structures, and killed 43 people. On October 9, 2017, Governor Jerry Brown declared a State of Emergency for Butte, Lake, Mendocino, Nevada, Orange, Napa, Sonoma and Yuba Counties due to the wildfires. On October 10, 2017, Governor Brown declared a State of Emergency for Solano County. In addition, FEMA declared the California Wildfires (DR-4344) a Major Disaster Declaration on October 10, 2017.<sup>1</sup>

AT&T has 45 Central Offices (COs) in the counties affected by the fires. Of these, 17 COs had areas within them that were burned, which includes 184 Distribution Areas (DAs). After assessing these 184 Distribution areas (DA) in the field, 57 DAs were cleared as having no damage to our facilities, 15 DAs were repaired and restored, and 112 DAs incurred damage requiring more complex restoration plans.<sup>2</sup> Of those 112 DAs, service has been restored in 23 DAs. AT&T's Outside Plant Construction and Engineering personnel remain on sight and continue their work to restore service in the remaining 89 DA.<sup>3</sup>

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<sup>1</sup> See FEMA, California Fires (DR-4344), [https://www.fema.gov/disaster/4344?utm\\_source=hp\\_promo&utm\\_medium=web&utm\\_campaign=disaster](https://www.fema.gov/disaster/4344?utm_source=hp_promo&utm_medium=web&utm_campaign=disaster) See also FEMA DR-4344 Map, Attachment A.

<sup>2</sup> See Attachment B (map illustrating the areas where AT&T's facilities sustained damage).

<sup>3</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

**(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 with as yet unknown origins.

**(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>4</sup>

**(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.

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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>4</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 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).

**(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.

Respectfully submitted,

By: /s/ Terri L. Hoskins

Terri L. Hoskins  
Christopher Heimann  
Gary L. Phillips  
David Lawson

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(202) 457-3047

*Its Attorneys*

December 7, 2017



# ATTACHMENT A

# FEMA-4344-DR, California Disaster Declaration as of 10/14/2017



FEMA








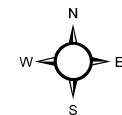
## Data Layer/Map Description:

The types of assistance that have been designated for selected areas in the State of California.

All designated areas in the State of California are eligible to apply for assistance under the Hazard Mitigation Grant Program.

## Designated Counties

-  No Designation
-  Public Assistance (Category B)
-  Public Assistance (Categories A and B)
-  Individual Assistance and Public Assistance (Category B)
-  Individual Assistance and Public Assistance (Categories A and B)



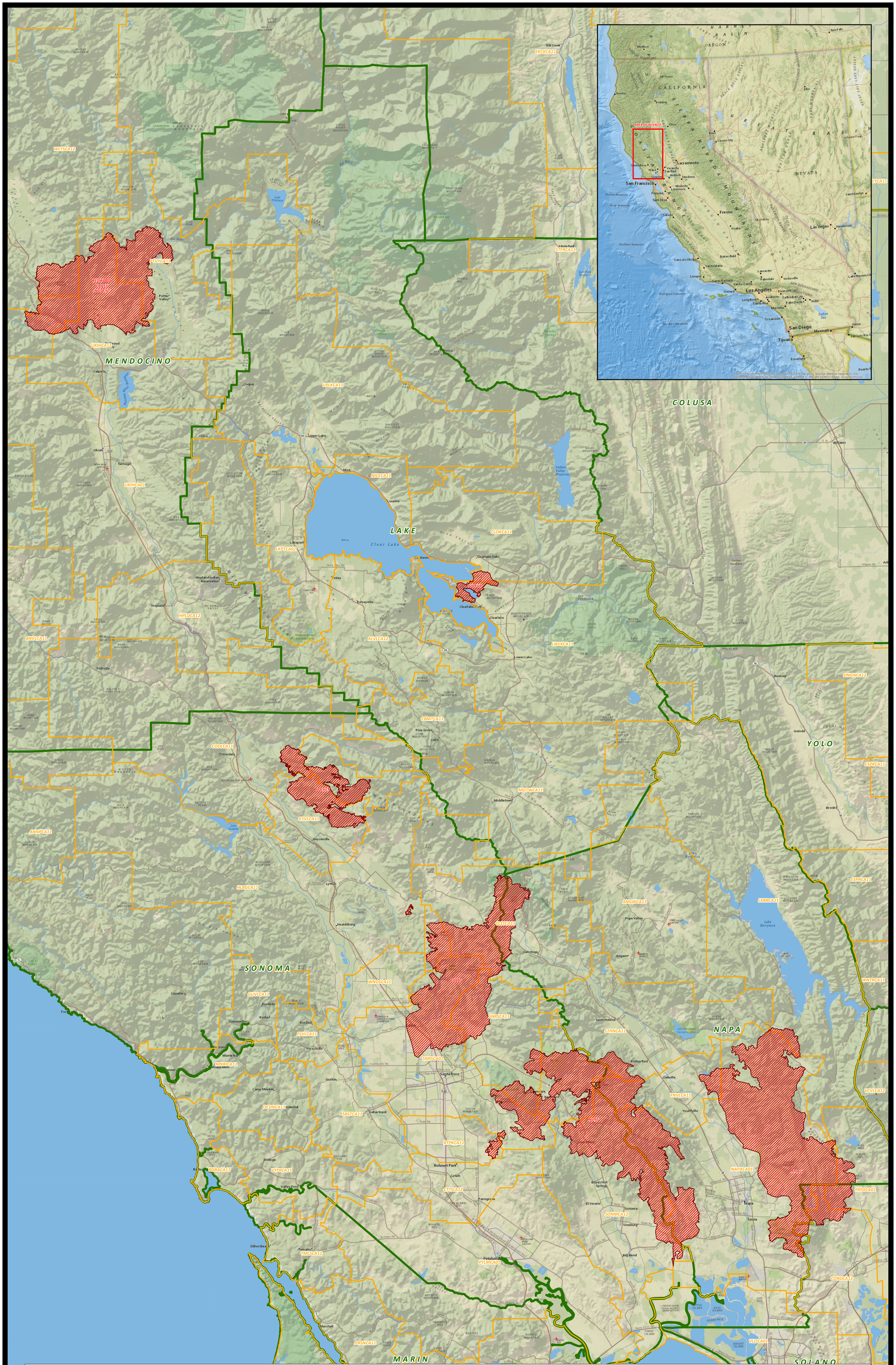
0 30 60 90 120  
Miles

## Data Sources:

FEMA, ESRI;  
Initial Declaration: 10/10/2017  
Disaster Federal Registry Notice:  
Amendment #3 - 10/14/2017  
Datum: North American 1983  
Projection: Lambert Conformal Conic

# ATTACHMENT B

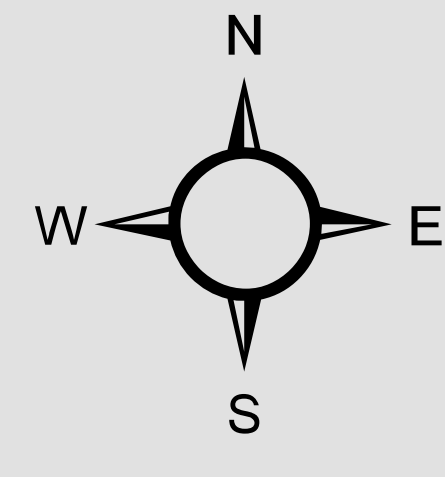




645 E Plumb Ln  
Reno, NV 89502  
775-333-2495

# OCTOBER WILDFIRE IMPACT NAPA-SONOMA-SANTA ROSA CLEARLAKE-UKIAH AREAS

- Wildfire Perimeter
- Wirecenter Boundary
- County Boundary
- Highway/Major Road



0 1 2 3  
Miles

Coordinate System:  
UTM Zone 10  
GCS\_NAD\_1983  
Date Created: 11/3/2017



AT&T

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