



Victoria Carter-Hall  
Manager - Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, NW  
10<sup>th</sup> Floor  
Washington, DC 20036  
202.457.2164  
Email: [vc3624@att.com](mailto:vc3624@att.com)

December 26, 2017

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

**Re: Public Notice of Copper Retirement Under Rule 51.332/ Rockport Texas/ Hurricane Harvey-Force Majeure Waiver**

Dear Ms. Dortch:

Pursuant to the requirements of the standing *Force Majeure* Waiver,<sup>1</sup> AT&T hereby submits this Public Notice of Copper Retirement Under Rule 51.332 (ATT20171221C.1). On August 25, 2017, Texas suffered severe damage when Hurricane Harvey made landfall as a category 4 hurricane. This was the strongest hurricane to hit the U.S. in more than a decade. Sustained rainfall for several days after landfall caused severe flooding in surrounding counties.<sup>2</sup> The Hurricane destroyed 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 and at least 6 days of sustained rainfall that followed, caused severe flooding in surrounding low-land areas, and caused secondary damage to AT&T equipment that remained under both salt and fresh water for many days.

On August 25, 2017, President Trump declared the southeastern counties of TX a major disaster area.<sup>3</sup> Approximately, 215 of AT&T's wire centers and 300 distribution areas (DAs) were initially impacted. AT&T activated its Disaster Relief Plan for Texas on August 26, 2017 and on August 28, 2017, notified the Texas Regulatory Commission that it declared a force majeure event because of the Hurricane.

On October 24, 2017, AT&T filed an application for emergency authorization under Section 214(a) of the Communications Act and Section 63.63 of the Federal Communications Commission's rules to suspend AT&T's interstate telecommunications services until services can be rebuilt.<sup>4</sup>

---

<sup>1</sup> In the event of disasters that prompt the triggering of a disaster recovery plan, the Commission granted AT&T Texas 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 Texas 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) ("*Force Majeure Waiver*"). This waiver became operative when AT&T Texas invoked its Disaster Relief Plan on August 26, 2017.

<sup>2</sup> See Attachment A, Map of FEMA-4332-DR, Texas Disaster Declaration as of 09/12/2017.

<sup>3</sup> See

[https://www.fema.gov/disaster/4332?utm\\_source=hp\\_promo&utm\\_medium=web&utm\\_campaign=disaster](https://www.fema.gov/disaster/4332?utm_source=hp_promo&utm_medium=web&utm_campaign=disaster)

<sup>4</sup> See *In the Matter of Section 63.63 Application Of AT&T Corp., SBC Long Distance, Southwestern Bell Telephone Company, and Teleport Communications America, LLC*, filed October 24, 2017 ("*Emergency 214*"). AT&T Texas served a courtesy copy of the Emergency 214 upon affected interconnected carriers through Accessible Letters.

AT&T Texas has determined that the copper facilities comprising the 134502 and 134902 Distribution Areas in the Rockport, TX wire center (RCPTTXRP) suffered severe and irreparable damage and must be retired because of the Hurricane.

A description of the network change is attached, and is also available online.

<b><u>NUMBER</u></b>	<b><u>TYPE OF CHANGES PLANNED</u></b>	<b><u>LOCATION OF CHANGE</u></b>
ATT20171221C.1	Southwestern Bell Telephone Company d/b/a AT&T Texas, is providing notice that it is retiring the SAI and copper facilities in distribution area 134502 and 134902 in the Rockport wire center RCPTTXRP 215 N Pearl St, Rockport, Texas 78382. This action will require the retirement of copper distribution plant and service wires (Drops) in DA 134502 and 134902. These copper distribution areas have been temporized with service wires to working customers, but AT&T Texas cannot maintain the temporized facilities as a permanent network solution for providing continued service. AT&T Texas has a Gigabit Passive Optical Network (GPON)/Fiber to the Premises (FTTP) platform available to serve the impacted addresses in the embedded document below. This project will be implemented on or after July 2, 2018.	Rockport, TX

This copper retirement notice is also available at: <https://ebiznet.att.com/networkreg/>

Should you have any questions, please do not hesitate to contact me at (202) 457-2164.

Sincerely,



Victoria Carter-Hall  
Manager – Federal Regulatory

Attachment

cc: Carmell Weathers  
Public Utility Commission of Texas  
Office of the Governor of Texas  
Department of Defense Chief Information Officer

## PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.332

**Network Disclosure  
Number:**

**ATT20171221C.1**

---

**Issue Date: 12/22/2017**

**Carrier's Name:**

Southwestern Bell Telephone Company d/b/a AT&T  
Texas

---

**Carrier's Address:**

1120 20<sup>th</sup> Street NW, Suite 1000, Washington, DC 20036

---

**Contact:**

Your Account Manager or Service Representative

**Technical Issues**

Terry McKenzie  
2800 W 10Th St  
Sioux Falls, SD 57104  
(605) 530-9456  
[tm921b@att.com](mailto:tm921b@att.com)

---

**Public Notice:** **can be obtained on the Internet at:**  
<https://ebiznet.att.com/networkreg/>

---

**Implementation Date:** On or after July 2018

**Description of Network Changes Planned:**

Southwestern Bell Telephone Company d/b/a AT&T Texas, is providing notice that it is retiring the SAI and copper facilities in distribution area 134502 and 134902 in the Rockport wire center RCPTTXRP 215 N Pearl St, Rockport, Texas 78382. This action will require the retirement of copper distribution plant and service wires (Drops) in DA 134502 and 134902. These copper distribution areas have been temporized with service wires to working customers, but AT&T Texas cannot maintain the temporized facilities as a permanent network solution for providing continued service. AT&T Texas has a Gigabit Passive Optical Network (GPON)/Fiber to the Premises (FTTP) platform available to serve the impacted addresses in the embedded document below. This project will be implemented on or after July 2, 2018.

On August 25, 2017, Texas suffered severe damage when Hurricane Harvey made landfall as a category 4 hurricane. This was the strongest hurricane to hit the U.S. in more than a decade. Sustained rainfall for several days after landfall caused severe flooding in surrounding counties. The Hurricane destroyed 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 and at least 6 days of sustained rainfall that followed, caused severe flooding in surrounding low-land areas and caused secondary damage to AT&T equipment that remained under both salt and fresh water for many days.

On August 25, 2017, President Trump declared the southeastern counties of TX a major disaster area. Approximately, 215 of AT&T's wire centers and 300 distribution areas (DAs) were initially impacted. AT&T activated its Disaster Relief Plan for Texas on August 26, 2017 and on August 28, 2017, notified the Texas Regulatory Commission that it declared a force majeure event because of the Hurricane.

On October 24, 2017, AT&T filed an application for emergency authorization under Section 214(a) of the Communications Act and Section 63.63 of the Federal Communications Commission's rules to suspend AT&T's interstate telecommunications services until services can be rebuilt.

As a result of the Hurricane, AT&T Texas has determined that the copper facilities comprising the 134502 and 134902 Distribution Areas in the Rockport, TX wire center (RCPTTXRP) suffered severe and irreparable damage and must be retired. Attachment A contains a listing of the affected addresses.

**Description of Reasonably Foreseeable Impact of the Planned Changes:**

After the retirement of the SAI and copper distribution facilities, AT&T Texas will no longer offer services over the copper network. The copper distribution plant and copper service wires (Drops) will be replaced with new fiber service wires to the NID. Currently there are no internet services available in the impacted DA's. High speed internet service will be available with GPON/FTTP service. There are presently 4 working POTS lines on the copper facilities being retired under this notice. This change does not impact these services. The impacted addresses are in the embedded document.

**Description of Changes to Rates, Terms and Conditions:**

In general, replacing copper facilities will not result in changes to rates, terms, and conditions where the affected service is converted to a like-for-like service available on fiber facilities.

List of affected premises included on the NCN as an excel attachment at - [https://ebiznet.att.com/networkreg/regulatory\\_documents/ATT20171221C.1\\_Web.doc](https://ebiznet.att.com/networkreg/regulatory_documents/ATT20171221C.1_Web.doc)  
A hard copy of this list can be obtained by contacting Terry McKenzie at the address listed above.