



221 East Fourth Street  
Cincinnati, OH 45202

October 29, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street S.W.  
Washington, D.C. 20554

Received & Inspected

OCT 30 2014

FCC Mail Room

Re: Section 63.71 Application of Cincinnati Bell Telephone Company LLC to Discontinue the Provision of Service.

Dear Ms. Dortch:

Cincinnati Bell Telephone Company LLC (CBT) submits the enclosed Application for Authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission's Rules to Discontinue Voice Grade Service in the Bethel, Ohio and Fairfield, Ohio wire centers. Voice Grade Service is found in Section 7 of FCC Tariff No. 35. Ohio Access Tariff PUCO No.2 mirrors FCC Tariff No. 35. Effective March 1, 2015, subject to the Commission's authorization, CBT will no longer offer Voice Grade Service in the Bethel, Ohio and Fairfield, Ohio wire centers. Current customers have been notified of the changes as of October 17, 2014.

Questions concerning this Transmittal should be directed to Mike Bishop at the above address, by phone at (513) 397-1231, or by email at [mike.bishop@cinbell.com](mailto:mike.bishop@cinbell.com).

Respectfully submitted,

A handwritten signature in cursive script that reads "Patrick M. Crotty".

Patrick M. Crotty  
Corporate Counsel

Enclosure

Cc: Public Utilities Commission for Each Impacted State  
Governor of Each Impacted State  
Secretary of Defense, Attn: Special Assistant for Telecommunications  
Rodney McDonald, Esq.

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of )  
)  
Section 63.71 Application of Cincinnati )  
Bell Telephone Company LLC for ) WC Docket No.  
Authority Pursuant to Section 214 of the )  
Communications Act of 1934 to ) Comp. Pol. No.  
Discontinue the Provision of Service )

FCC Mail Room

**SECTION 63.71 APPLICATION OF CINCINNATI BELL TELEPHONE  
COMPANY LLC TO DISCONTINUE THE PROVISION OF SERVICE**

Cincinnati Bell Telephone Company LLC ("CBT") hereby submits this Application for Authority under Section 214(a) of the Communications Act and Section 63.71 of the Federal Communications Commission's ("the Commission") rules to withdraw Voice Grade Service in CBT's Fairfield, Ohio and Bethel, Ohio wire centers. Voice Grade Service is found in CBT's FCC Tariff No. 35. CBT's intrastate Ohio Access Tariff PUCO No. 2 mirrors FCC Tariff No. 35.

As required by Sections 63.71(a) and (b) of the Commission's rules, CBT provides the following information:

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

Cincinnati Bell Telephone Company LLC  
221 East Fourth Street  
Cincinnati, Ohio 45202

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

Subject to the Commission's authorization to discontinue service pursuant to Section 63.71(c) of the Commission's rules, 47 C.F.R. § 63.71(c), the Voice Grade

Service contained in CBT's Tariff FCC No. 35 and Tariff PUCO No. 2 will no longer be offered in the Fairfield, Ohio and Bethel, Ohio wire centers effective March 1, 2015.

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

Voice Grade Service found in CBT's Tariff FCC No. 35 and Tariff PUCO No. 2 will no longer be offered in the Fairfield, Ohio and Bethel, Ohio wire centers within CBT's service area.

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

Voice Grade Service consists of channels which provide voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz and may be terminated two-wire or four-wire. Voice Grade channels are provided between customer designated premises, between a customer designated premises and a Telephone Company hub or as a WATS Access Line (WAL) between a customer designated premises and a WATS Serving Office (WSO).

There are currently 8 customers for CBT's Voice Grade Service in the Fairfield, Ohio and Bethel, Ohio wire centers. Voice Grade Service has declined as customers move to faster Ethernet-based services. Because of the few number of customers, the public convenience and necessity will not be impaired by this proposed service discontinuance.

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

CBT notified customers of the discontinuance of Voice Grade Service in the Fairfield, Ohio and Bethel, Ohio Central Offices by letter sent via U.S. mail on October 17,

2014. Copies of the customer notification letters are appended hereto as Attachment A. The letters inform affected customers that, with the required Commission approval, CBT plans to discontinue Voice Grade Service as of March 1, 2015.

Copies of this Application are being sent via first class U. S. Mail to the Governor of Ohio, the Public Utilities Commission of Ohio and the Special Assistant for Telecommunications to the Secretary of Defense, 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)):**

CBT is considered dominant with respect to the services to be discontinued.

**CONCLUSION**

CBT Respectfully requests that the Commission approve this Application.

Respectfully Submitted,

By: Patrick M. Crotty  
Patrick M. Crotty  
Corporate Counsel  
Cincinnati Bell Telephone Co. LLC  
221 East Fourth Street  
Cincinnati, Ohio 45202  
(513) 565-0133

October 29, 2014

I, Patrick M. Crotty, do hereby certify that I have on this 29th day of October, 2014, caused a copy of the foregoing "Section 63.71 Application of Cincinnati Bell Telephone Company LLC to Discontinue the Provision of Service" to be served by U.S. mail upon the following:

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

The Honorable John R. Kasich  
Governor's Office  
Riffe Center, 30th Floor  
77 South High Street  
Columbus, OH 43215-6108

Secretary of Defense  
Attn: Special Assistant for Telecommunications  
Pentagon  
Washington, D.C. 20301

  
Patrick M. Crotty

**Cincinnati Bell™**

221 East Fourth Street  
Cincinnati, OH 45202

Received & Inspected

OCT 30 2014

10/17/14

FCC Mail Room

Customer Name  
Street Address  
City, State Zip

**Re: Withdrawal of Analog Voice Grade Services**

Dear Cincinnati Bell Business Customer:

For more than 140 years, Cincinnati Bell has been delivering high performance, reliable business communications services. In order to continue building on our rich heritage of innovation and deliver services that customers are demanding, we are accelerating our investment in the network. We are proud to say that no other service provider in the region is investing in their network like Cincinnati Bell.

The majority of our network investment is focused on expanding the reach of our fiber optic network, so that we can meet the need for high speed Internet and other services that traditional copper lines cannot support. At the same time, we are also removing equipment from the network that no longer meets our standards for reliability and performance.

Your company is currently purchasing Analog Voice Grade Services, which is the underlying service that supports your IP VPN and Ethernet features from Cincinnati Bell. This product has reached the end of its useful life. Please consider this letter to be Cincinnati Bell's formal notice that, subject to the approval of the Federal Communications Commission ("FCC"), Cincinnati Bell Telephone Company LLC ("CBT") plans to withdraw the Analog Voice Grade Service within the Bethel and Fairfield wire centers on or after March 1, 2015. Although CBT can continue to provide IP VPN and Ethernet capability using advanced technologies, the services you utilize today may need to be reconfigured to be compatible with our upgraded network.

If you also subscribe to other services from CBT, those services will NOT be impacted by the anticipated withdrawal of the Analog Voice Grade Service.

We understand that making changes that impact the services you purchase from Cincinnati Bell is an inconvenience. To ensure a smooth transition to an alternative product that will provide you with a better experience that is based on current technology,

your Cincinnati Bell Account Manager will be contacting you shortly to schedule a meeting to review your communications requirements.

Cincinnati Bell is dedicated to providing the finest business communications services and customer care available, and we look forward to working with you to meet your needs. If you wish to contact me, please do so at the email provided below.

Sincerely,



Michael Herrmann  
Vice President, Product Management  
[Michael.herrmann@cbts.net](mailto:Michael.herrmann@cbts.net)

**Cincinnati Bell Telephone Company LLC is required by the Federal Communications Commission to provide the following statement:**

The Federal Communications Commission ("Commission") will normally authorize this proposed discontinuance of service 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. Address comments 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 **Cincinnati Bell Telephone Company LLC**. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Ohio customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at [www.puco.ohio.gov](http://www.puco.ohio.gov). Hearing or speech impaired customers may contact the PUCO via 7-1-1 (Ohio relay service.)