

# WYLF 850 AM

**"America's Best Music"**

January 30, 2015  
MB Communications / WYLF AM 850  
100 Main Street  
Penn Yan, NY 14527

Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street S.W. Room TW-A325  
Washington DC, 20554

Received & inspected

FEB 09 2015

FCC Mail Room

Re: Re: WC Docket No 14-135 Comp. Pol File No. 1164

Dear Sir/Madam:

I am writing to formally object to Verizon's plan to discontinue the program audio service for our radio station. We were informed of the discontinuation of service in December 2014, as Verizon wants to alter/upgrade their system (letter enclosed). Verizon provides the equalized phone line circuit which delivers our audio signal from our studio to our transmitter. **Verizon has indicated that they will cut off our service on or about March 31, 2015.** If we agree to Verizon's new system, our rates will increase from \$91.42 to \$695 (before taxes). **This is an increase of more than 660%! I'm enclosing our current bill and the proposed quote from Michelle Feldman at Verizon, for \$695 per month and a fee for \$2,267.17 in equipment purchases that WYLF would have to pay.** Also note that in the enclosed letter to WYLF, Verizon stated that a Verizon representative would be contacting WYLF to discuss alternative solutions for our radio station. No representative ever contacted us. We would have been filing this objection earlier if we had been properly notified.

We have made an exhaustive search and cannot find a reasonable economic alternative to our current service. For example, the local cable company, Time Warner Communications, will only provide service at our transmitter site if we agree to a \$50,000 fee. **Internet through satellite is also cost prohibitive.** Therefore, the impact of the proposed Verizon discontinuance upon our company would be that it **would put us out of business and cause our employees to lose their jobs.** We absolutely cannot afford Verizon's proposed increases.

Please understand, we are a very small, rural business, serving the village of Penn Yan, New York and the entire Finger Lakes Region. **We provide a vital and essential service for this region because we're part of the Emergency Alert System** and much more.

No. of Copies rec'd 0  
List ABOVE

**Serving the Finger Lakes, Southern Tier, and Greater Rochester**

WYLF • 100 Main Street • Penn Yan, New York 14527  
(315) 536-0850 • Fax (315) 536-3299 • Email: admin@WYLF.com

In reference to the enclosed FCC article entitled "FCC PROPOSES FACILITATING TECHNOLOGY TRANSITIONS BY MODERNIZING CONSUMER PROTECTION, COMPETITION RULES" - it states "The FCC adopted a Declaratory Ruling clarifying that the circumstances in which a carrier must seek approval **to discontinue a service depend upon the practical impact of its actions, not the fine print of an aging tariff filing.** This ensures that there will be a public process to evaluate a proposed discontinuance before a choice is removed from the market, regardless of how the carrier has written its tariff."

We object to Verizon discontinuing our current service (which has served us and our community very well for more than forty years) and upgrading to a new service we cannot afford. **Again, the practical impact of their action is we will go out of business.** For these reasons, we are asking you to intercede on our behalf and please make an exception in our case.

Thank you very much for your help and prompt response to our urgent need.

Sincerely,

A handwritten signature in cursive script that reads "Philip Mann". The signature is written in black ink and is positioned above a horizontal line that serves as a separator between the signature and the typed name.

Philip Mann  
General Manager  
MB Communications/WYLF AM 850 Radio  
PM/sh  
Enclosures (7)  
cc: Competition Policy Division



# NEWS

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D. C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-868-835-5322

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action.  
See MCI v. FCC, 516 F.2d 385 (D.C. Cir. 1974).

FOR IMMEDIATE RELEASE:  
November 21, 2014

NEWS MEDIA CONTACT:  
Mark Wigfield, 202-418-0253  
E-mail: [mark.wigfield@fcc.gov](mailto:mark.wigfield@fcc.gov)

## FCC PROPOSES FACILITATING TECHNOLOGY TRANSITIONS BY MODERNIZING CONSUMER PROTECTION, COMPETITION RULES

Proposals Meant to Preserve Access to 911, Increase Transparency & Maintain Competitive Choices

Washington, D.C. – Taking steps to facilitate the ongoing transitions in the nation's communications networks, the Federal Communications Commission is seeking comment on modernizing its rules to ensure access to 911 service, protect consumers, and preserve competition as the transitions move forward.

The nation's communications networks are shifting from copper networks using legacy technologies to fiber, coaxial cable, and wireless networks using Internet Protocol (IP)-based technologies to carry voice, data and video. The Notice of Proposed Rulemaking adopted by the FCC today includes proposals to update rules ensuring access to public safety, protecting consumers faced with network changes and discontinuation of services, and preserving wholesale access to last-mile networks by competitive providers serving businesses and large institutions.

This modernization of FCC rules will help expedite the transition to next generation networks by protecting core network values in order to give consumers and businesses the confidence they need to embrace technological change and all its benefits.

### Protecting Consumers' Ability to Call 911 during a Power Outage

Traditional phone service on copper networks usually works even during broader power outages because the copper wires are powered separately by the phone company. While modern fiber and cable networks have many advantages, they do not provide power to the handset. Instead, during a power outage, consumers must rely on a battery back-up in their own homes. The NPRM:

- Proposes a framework to establish reasonable expectations for when providers should bear responsibility for providing a backup power solution for the communications equipment at a customer's home during a power outage.
- Seeks comment on different back-up power technologies and solutions in the marketplace today.
- Examines potential strategies for providing back-up power during lengthy commercial power failures.

### Increased Transparency to Empower and Protect Consumers During Transitions

While new networks can provide a wealth of innovative features, many consumers and small businesses rely on services that may not be supported following a transition. The expected frequency of network changes and discontinuances requires the FCC to modernize its rules regarding consumer notice and input in the event of network changes and discontinuances. The NPRM:

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- Proposes greater transparency, consumer protection, and opportunities for consumer input when carriers are planning to shut down (or "retire") their existing copper networks.
- Sets in motion a process to ensure that new services meet the needs of consumers before carriers are allowed to remove legacy services from the marketplace.
- Asks for facts and data about whether carriers are, in effect, retiring copper networks without giving notice simply by failing to maintain them.
- Asks about allegations that carriers are not being clear with consumers about the options available when the copper network is shut down.

#### Preserving and Encouraging Competition

Small and medium-sized businesses, schools, hospitals, and other government institutions often rely on services delivered by competitive broadband and phone providers. Yet competitive providers may no longer be able to reach customers if incumbent carriers withdraw certain "last mile" services. The NPRM:

- Tentatively concludes that carriers seeking to discontinue a service used as a wholesale input should be required to provide competitive carriers equivalent wholesale access going forward.
- Proposes to update the FCC's rules so that competitive carriers receive sufficient notice of when copper networks are being shut off, so that they can continue to serve their customers effectively.

#### Declaratory Ruling

The FCC also adopted a Declaratory Ruling clarifying that the circumstances in which a carrier must seek approval to discontinue a service depend upon the practical impact of its actions, not the fine print of an aging tariff filing. This ensures that there will be a public process to evaluate a proposed discontinuance before a choice is removed from the market, regardless of how the carrier has written its tariff.

Action by the Commission November 21, 2014, by Notice of Proposed Rulemaking and Declaratory Ruling (FCC 14-185). Chairman Wheeler, Commissioners Clyburn and Rosenworcel with Commissioners Pai and O'Rielly concurring in part and dissenting in part. Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai and O'Rielly issuing statements.

WC Docket Nos.: 14-174 and 13-5

-FCC-

News about the Federal Communications Commission can also be found  
on the Commission's web site [www.fcc.gov](http://www.fcc.gov).

FEB 09 2015

Document  
1 of 2  
Studio



FCC Mail Room

<b>Customer Legal Entity:</b>	<b>Verizon Legal Entity:</b>	MCI Communications Services, Inc. d/b/a Verizon Business Services
<b>Customer Address:</b>	<b>Quote Priced On:</b>	20 Jan 2015, 20:47:20 +0000
<b>Account Manager:</b> Michelle Feldman michelle.feldman@one.verizon.com 303-305-6150	<b>Quote ID:</b>	190763673
<b>Created By:</b> Michelle Feldman	<b>Quote Version #:</b>	0
	<b>Quote Expiration Date:</b>	06 Mar 2015
	<b>Contract ID:</b>	New

**Service(s) Included in Quote:** Access, Internet Dedicated Services, CPE  
**Note:** Items shown with \*\*\* require a Service Order Form document

**Available Appendices (Additional Details):** CPE

**Quote Summary:** All charges displayed in Invoice Currency unless otherwise noted

Customer Legal Entity	Customer Legal Entity Address:	Verizon Legal Entity	Currency	MRC	NRC
No CLE Available		MCI Communications Services, Inc. d/b/a Verizon Business Services	USD	347.50	1,112.50

Activity Type	Quantity	Amount in Quote Currency (USD)	
		MRC	NRC
<b>main, Location ID: 6769933C</b>			
<b>100 MAIN ST, PENN YAN, NY 14527-1233, United States</b>			
<b>Access</b>			
Access, Service ID: 60875191 * (No CLE Available / No CLE country available, MCI Communications Services, Inc. d/b/a Verizon Business Services)	Added		
Service Commitment: 36 months			
Local Access - Gold - Gold - 1.5 Mbps	N/A	160.00	0.00
Promotion: Internet Dedicated New Service Incentive			
<b>Internet Dedicated Services</b>			
Internet Dedicated Services, Service ID: 60875192 * (No CLE Available / No CLE country available, MCI Communications Services, Inc. d/b/a Verizon Business Services)	Added		
Service Commitment: 36 months			
Internet Dedicated Port - Tiered - 1.5 Mbps	N/A	187.50	0.00
Promotion: Internet Dedicated New Service Incentive			
<b>CPE</b>			
CPE, Service ID(s): See CPE Appendix* (No CLE Available / MCI Communications Services, Inc. d/b/a Verizon Business Services)	See CPE Appendix		
Service Commitment: See CPE Appendix			
CPE & CPE Services	N/A	0.00	1,112.50

*Handwritten notes:*  
 monthly recurring charge  
 proposed new prices  
 studio transmitter before taxes \$695/mo  
 1,112.50 studio router  
 1,154.67  
 2,267.17 one time charge equipment fee  
 current price 91.42/mo before taxes



1 Subject to terms and conditions, Customers who order Verizon Internet Dedicated + for the first time with a minimum two year Service Commitment or Volume Commitment Period, as applicable (for purposes of this promotion the "Commitment"), will receive credits equal to the monthly recurring charges ("MRC") for the Internet Dedicated port and the MRC for Access in the second monthly billing period for a two year Commitment. Customers committing to a three year Commitment or greater will receive credits equal to the MRC for the Internet Dedicated port and the MRC for Access in the second and third monthly billing periods. Only Internet Dedicated ports located in the contiguous United States are eligible for this promotion. Local Access wireless backup connections used with Verizon's Internet Dedicated Services are not eligible for this promotion

For customers agreeing to only a two year Commitment, certain Access + services are located in geographical areas where such services are provisioned using Gigabit Passive Optical Network technologies and in such geographical areas, both the Access + services and the Internet Dedicated port are ineligible for this promotion.

Access circuits which qualify for Access + credits in both the Private IP + Fast Start and Internet Dedicated New Service Incentive shall only receive credits for Access as specified in the Private IP + Fast Start Promotion.

This draft Quotation is for informational purposes only and is subject to change. Prices are exclusive of VAT and other taxes.

Pricing assumes the provision of accurate customer information. Provisioning is subject to order acceptance.

Pricing and provisioning are subject to the solution being deliverable and billable in accordance with negotiated terms and conditions including service level agreements which have been agreed upon by Verizon and the customer in writing.

Budgetary



### Appendix: CPE

main, Location ID: 6769933C  
100 MAIN ST, PENN YAN, NY 14527-1233, United States

**CPE Detail with Management Association details (all amounts displayed in Invoice Currency)**

Customer Legal Entity:		Ship To:	100 MAIN ST, PENN YAN, NY, 14527-1233, United States
Verizon Legal Entity:	MCI Communications Services, Inc. d/b/a Verizon Business Services	Bill To:	

Service ID: 60875253  
 Service Commitment: 36 months  
 Activity Type: Added

Description	Activity Type	Quantity	MRC (USD)	NRC (USD)	Related Management
Equipment - Purchase - 4200862L1 - NETVANTA 3200 W-T1-FT1 NIM	Added	1	N/A	619.55	
Labor - Purchase - CPE IMPLEMENTATION-IDS - STAGING AND WAN SIDE DEPLOYMENT ONLY	Added	1	N/A	471.92	
Equipment - Purchase - 92516-010-N01 - CTE-6080-0270 REV A RJ48 - RJ48 CABLE - Includes: CPE IMPLEMENTATION-IDS	Added	1	N/A	10.20	
<b>Subtotal</b>			<b>0.00</b>	<b>1,101.67</b>	

	Shipping and Handling		N/A	10.83	
<b>Subtotal</b>			<b>0.00</b>	<b>10.83</b>	

<b>Site Total (CPE)</b>			<b>0.00</b>	<b>1,112.50</b>	
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Budget



<b>Customer Legal Entity:</b>		<b>Verizon Legal Entity:</b>	MCI Communications Services, Inc. d/b/a Verizon Business Services
<b>Customer Address:</b>		<b>Quote Priced On:</b>	20 Jan 2015, 18:25:26 +0000
<b>Account Manager:</b>	Michelle Feldman michelle.feldman@one.verizon.com 303-305-6150	<b>Quote ID:</b>	190762873
<b>Created By:</b>	Michelle Feldman	<b>Quote Version #:</b>	0
		<b>Quote Expiration Date:</b>	06 Mar 2015
		<b>Contract ID:</b>	New

**Service(s) Included in Quote:** Access, Internet Dedicated Services, CPE  
**Note:** Items shown with "\*" require a Service Order Form document

**Available Appendices (Additional Details):** CPE

**Quote Summary:** All charges displayed in Invoice Currency unless otherwise noted

Customer Legal Entity	Customer Legal Entity Address:	Verizon Legal Entity	Currency	MRC	NRC
No CLE Available		MCI Communications Services, Inc. d/b/a Verizon Business Services	USD	347.50	1,154.67

Activity Type	Quantity	Amount in Quote Currency (USD)			
		MRC	NRC		
main, Location ID: 6764646C 3253 E SHERMAN HOLLOW RD, PENN YAN, NY 14527-9310, United States	Transmitter location	monthly recurring charge	347.50	1,154.67	transmitter router
Access					
Access, Service ID: 60846942 * (No CLE Available / No CLE country available, MCI Communications Services, Inc. d/b/a Verizon Business Services)	Added	transmitter / X2 studio = 695/mo		1,112.50	studio router
Service Commitment: 36 months				2,267.17	equip fee
Local Access - Gold - Gold - 1.5 Mbps	N/A	new price	160.00	0.00	
Promotion: Internet Dedicated New Service Incentive				current price 91.42/mo	
Internet Dedicated Services					
Internet Dedicated Services, Service ID: 60846943 * (No CLE Available / No CLE country available, MCI Communications Services, Inc. d/b/a Verizon Business Services)	Added				
Service Commitment: 36 months					
Internet Dedicated Port - Tiered - 1.5 Mbps	N/A		187.50	0.00	
Promotion: Internet Dedicated New Service Incentive					
CPE					
CPE, Service ID(s): See CPE Appendix* (No CLE Available / MCI Communications Services, Inc. d/b/a Verizon Business Services)	See CPE Appendix				
Service Commitment: See CPE Appendix					
CPE & CPE Services	N/A		0.00	1,154.67	



1 Subject to terms and conditions, Customers who order Verizon Internet Dedicated + for the first time with a minimum two year Service Commitment or Volume Commitment Period, as applicable (for purposes of this promotion the "Commitment"), will receive credits equal to the monthly recurring charges ("MRC") for the Internet Dedicated port and the MRC for Access in the second monthly billing period for a two year Commitment. Customers committing to a three year Commitment or greater will receive credits equal to the MRC for the Internet Dedicated port and the MRC for Access in the second and third monthly billing periods. Only Internet Dedicated ports located in the contiguous United States are eligible for this promotion. Local Access wireless backup connections used with Verizon's Internet Dedicated Services are not eligible for this promotion

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Access circuits which qualify for Access + credits in both the Private IP + Fast Start and Internet Dedicated New Service Incentive shall only receive credits for Access as specified in the Private IP + Fast Start Promotion.

This draft Quotation is for informational purposes only and is subject to change. Prices are exclusive of VAT and other taxes.

Pricing assumes the provision of accurate customer information. Provisioning is subject to order acceptance.

Pricing and provisioning are subject to the solution being deliverable and billable in accordance with negotiated terms and conditions including service level agreements which have been agreed upon by Verizon and the customer in writing.

Budgetary



### Appendix: CPE

main, Location ID: 6764646C  
3253 E SHERMAN HOLLOW RD, PENN YAN, NY 14527-9310, United States

**CPE Detail with Management Association details** (all amounts displayed in Invoice Currency)

Customer Legal Entity:		Ship To:	3253 E SHERMAN HOLLOW RD, PENN YAN, NY, 14527-9310, United States
Verizon Legal Entity:	MCI Communications Services, Inc. d/b/a Verizon Business Services	Bill To:	

Service ID: 60846944  
 Service Commitment: 36 months  
 Activity Type: Added

Description	Activity Type	Quantity	MRC (USD)	NRC (USD)	Related Management
Equipment - Purchase - 4200862L1 - NETVANTA 3200 W-T1-FT1 NIM	Added	1	N/A	642.22	
Labor - Purchase - CPE IMPLEMENTATION-IDS - STAGING AND WAN SIDE DEPLOYMENT ONLY	Added	1	N/A	491.05	
Equipment - Purchase - 92516-010-N01 - CTE-6080-0270 REV A RJ48 - RJ48 CABLE - Includes: CPE IMPLEMENTATION-IDS	Added	1	N/A	10.57	
<b>Subtotal</b>			<b>0.00</b>	<b>1,143.84</b>	

	Shipping and Handling		N/A	10.83	
<b>Subtotal</b>			<b>0.00</b>	<b>10.83</b>	

<b>Site Total (CPE)</b>			<b>0.00</b>	<b>1,154.67</b>	
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Budget Alert



Workspace Webmail

Logged in as: admin@wyif.com Log Out

Updated View Support

Homepage Email Calendar Files Fax

Check Email Compose Address Book Settings Tools Help

Zoom Compose Email

Search... Go Adv. Search

Folders Saved Search

Storage Usage 91% Upgrade 100 MB

New Folder

- Inbox (75)
- Bulk Mail [purge] (1)
- Drafts
- Templates
- Send Later
- Sent Items
- Trash [purge] (13)

Storage Warning!

91% Full Buy More or remind me again in: 1 day

Save Search As: Add

Move to Folder More Actions

Search Results > Message Detail Entire thread Print Previous Next

**Subject:** RE: FW: quotes for new circuits

**From:** "Feldman, Michelle T" <michelle.feldman@verizon.com> (Add as Preferred Sender) =>

**Date:** Wed, Jan 28, 2015 9:13 am

**To:** "admin@wyif.com" <admin@wyif.com>

Hi Sandy,

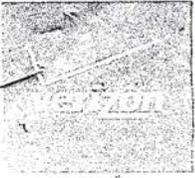
The total monthly recurring charge for both circuits is \$695. Taxes will be additional. Thanks!

Michelle Feldman  
 Account Manager - Medium Business | Verizon Enterprise Solutions  
 Tel: 303 305 6150  
 6415 Business Center Drive, Highlands Ranch, CO 80130, USA  
 michelle.feldman@verizon.com

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**ACCESS  
BILLING**

Account Number  
**315 M55-1334 333**  
December 13, 2014

**MB COMMUNICATIONS  
ATTN WYLF-AM 850  
100 MAIN ST  
PENN YAN NY 14527**

Invoice Number
<b>M551334333-14347</b>

Payment Due Date
<b>January 13, 2015</b>

Total Amount Due
<b>\$108.97</b>

*Billing Inquiries Call (800) 476-8372*

**BMO OFC MB1**

**PAID**  
CK. NO. 1438  
DATE 12-29-14

**Please fold and detach here. Return portion below with your payment.  
All charges are payable to Verizon.**



Received & Inspected

FEB 09 2015

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ACCESS BILLING Page 1

Account number 315 M55-1334 333 December 13, 2014

M B COMMUNICATIONS ATTN WYLF-AM 850 100 MAIN ST PENN YAN NY 14527

BILLING INQUIRIES CALL (800) 476-8372 WEB ADDRESS: WWW.VERIZON.COM

FOR TELCO USE: ICSC OFC BMB1 TAX ID: 13-5275510

FACILITY ACCESS SERVICES

\*\*\* BALANCE DUE INFORMATION \*\*\*

TOTAL AMOUNT OF LAST BILL	108.97	
PAYMENTS APPLIED - SEE DETAIL	108.97CR	
ADJUSTMENTS APPLIED	.00	
ZERO BALANCE DUE . . . . .		.00

\*\*\* DETAIL OF CURRENT CHARGES \*\*\*

TOTAL - NY - 5130		
LATE PAYMENT CHARGES APPLIED		.00
MONTHLY ACCESS CHARGES FROM DEC 13 THRU JAN 12 INTERSTATE	91.42	<del>91.42</del>
OTHER CHARGES AND CREDITS		.00
TAXES		.00
SURCHARGE - SEE DETAIL		17.55
TOTAL CURRENT CHARGES * DUE BY JAN 13, 2015 *		108.97

Current monthly recurring charge

TOTAL AMOUNT DUE 108.97



Account number  
 315 M55-1334 333  
 December 13, 2014

SVC ESTBL	:QTY	:CODE	---SERVICE AND FEATURES--- DESCRIPTION	:TAX:	AMOUNT	ACTVTY :DATE
122988		CLS	36.PJGL.101640..NY /NC PJ-- /PIU 100 /USFS N			122988
122988	1	XZQ3H				122988
122988		CKL	1-100 MAIN, PENN YAN, NY /SN WQKA /LSO 315 536 /NCI 02PG2.8 /TAR E466 /LCON ERIC MELENBACKER, 315 53 6-3351 /DES LOC STUDIO /LSOC PNYNNYPNDS0			090994
122988	1	S25EX				122988
122988	1	T6ECS				071306
			INTER NY - EC 5130 100.00 % X 1	7,9		
			X 45.71		45.71	
122988		CKL	2-2 TRANSMITTER SITE, PENN YAN , NY /SN WQKA TRANSMITTER - Now WYLF /LSO 315 536 /NCI 02PG2.8 /TAR E466 /LCON ERIC MELLEENBACKER, 716 2 88-5965 /ZCAC SKC2UR2 /DES LOC TRANSMITTER /LSOC PNYNNYPNDS0			090994
122988	1	T6ECS				071306
			INTER NY - EC 5130 100.00 % X 1	7,9		
			X 45.71		45.71	
			INTERSTATE SUBTOTAL NY 5130		91.42	
			CIRCUIT SUBTOTAL NY 5130		91.42	
			INTERSTATE TOTAL NY 5130		91.42	
			ACCOUNT TOTAL NY 5130		91.42	

---SUMMARY---

ACTIVITY LEGEND  
 \* - SERVICE ORDER ACTIVITY  
 D - REMOVAL EQUIPMENT  
 R - RATE CHANGE  
 M - MISCELLANEOUS

Account number  
315 M55-1334 333  
December 13, 2014

\*\*\* DETAIL OF SURCHARGE \*\*\*

NEW YORK - 5130

<u>TYPE</u>	<u>MONTHLY ACCESS</u>	<u>USAGE</u>	<u>OTHER</u>	<u>TOTAL</u>
GROSS INC	2.83	.00	.00	2.83
FED. UNIV. SVC. FUND	14.72	.00	.00	14.72
TOTAL	17.55	.00	.00	17.55



Account number  
315 M55-1334 333  
December 13, 2014

\*\*\* FACILITY ACCESS CIRCUIT LISTING \*\*\*

THE FOLLOWING CIRCUITS ARE INCLUDED IN THE MONTHLY ACCESS CHARGES

<u>CIRCUIT IDENTIFICATION</u>	<u>AMOUNT</u>	<u>MPB</u>
NON HIGH CAPACITY		
CLS 36.PJGL.101640..NY CKR UNKNOWN INTERSTATE NY - EC 5130	91.42	
INTERSTATE SUBTOTAL	91.42	
TOTAL FACILITY CIRCUIT CHARGES . . . . .	91.42	
TOTAL FACILITY CIRCUITS . . . . .		1

Verizon  
22001 Loudoun County Parkway  
G2-2-543  
M-17  
Ashburn, VA 20147 USA



**RECEIVED**

JWP 12-29-14

194-100334  
ATTN: WYLF-AM 850  
M B COMMUNICATIONS  
100 MAIN ST  
PENN YAN NY 14527  
USA

December 28, 2014  
Received & Inspected

FEB 09 2015

FCC Mail Room

**RE: IMPORTANT NOTICE**

**Verizon Metallic, Program Audio and Telegraph Grade Service Discontinuation Effective 3/31/2015**  
**Account Number: 315M551334333**

Dear Valued Customer,

Previously, Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") notified you that in 2014 the Verizon services specified below, would no longer be offered to the public. We also advised you that existing Metallic, Program Audio and Telegraph Grade subscribers would continue to receive their service, but that they would be given a notification prior to discontinuance of these services. **This letter serves as Verizon's 90-day notification to discontinue these services.**

Unless your service is subject to a term agreement that has not yet expired (and will not expire by March 31, 2015) your Verizon services specified below will be subject to immediate termination following the March 31, 2015 discontinuance date. To avoid a service disruption, you must take action now.

This notice applies to the following Verizon Services:

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. FCC No. 1, Section 7.2.1 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.1 – CT, NY, MA, RI.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. FCC No. 1, Section 7.2.4 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.4 – CT, NY, MA, RI; FCC No. 14, Section 5.2.3 – CA, FL, PA, TX, VA; and FCC No. 16, Section 7.6 – CA, NC, PA, TX, VA.
- **Telegraph Grade.** Telegraph Grade service provides an unconditional analog channel capable of transmitting binary signals at rates of 0-75 baud or 0-150 baud. FCC No.1, Section 7.2.2 – PA, DE, MD, VA, NJ, DC; and FCC No. 11, Section 7.2.2 – CT, NY, MA, RI.

Verizon strongly encourages you to immediately consider other product options and is committed to working with you to transition your company to an alternate service as seamlessly as possible. Verizon offers a variety of solutions that provide reliable voice and data transmission capability, which allow for faster collaboration, enhanced service monitoring, and integration of new applications, including Private IP, Ethernet, and FiOS Business services.

For more information regarding this product termination, please call 1 (877) 550-7419.

We value your business relationship with Verizon and look forward to our continued partnership to realize the benefits and opportunities our advanced technology solutions can offer your company.

Sincerely,

Verizon Enterprise Solutions

## Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

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

<b>Verizon Operating Companies</b>
Verizon California Inc. 2535 W. Hillcrest Drive, CAM21LB Newbury Park, CA 91320
Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801
Verizon Florida LLC 610 Zack Street Tampa, FL 33602
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202
Verizon New England Inc. 125 High Street - Oliver Tower 7th Floor Boston, MA 02110
Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102
Verizon New York Inc. 140 West Street New York, NY 10007
Verizon North LLC 1717 Arch Street Philadelphia, PA 19103
Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103
GTE Southwest Incorporated (d/b/a Verizon Southwest) 600 Hidden Ridge Irving, TX 75038
Verizon South Inc. 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Washington, DC Inc. 1300 I Street, N.W., Suite 400 West Washington, DC 20005

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Room G2-2-543  
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Received & inspected

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July 31, 2014

FCC Mail Room

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Dear Valued Customer,

Verizon's ability to stay at the forefront of technology evolution allows us to help business innovate, originate and unlock new revenue streams. To consistently help you succeed in an ever-changing and increasingly globalized environment, we continue to focus on the technologies that influence the way businesses operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

Subject to FCC approval and applicable tariff and contractual obligations, the following interstate services will be grandfathered in the applicable Verizon FCC tariffs and then later discontinued: Metallic and Program Audio (individually and collectively referred to as the "Grandfathered Service(s)").

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. FCC No. 1, Section 7.2.1 -VA, DC.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. FCC No. 1, Section 7.2.4 - PA, MD, VA; FCC No. 11, Section 7.2.4 - CT, NY, MA, RI; and FCC No. 14, Section 5.2.3 - CA, PA, TX.

This initiative will allow us to serve you better - ensuring you can seize the advantages of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

On or after October 31, 2014, subject to approval from the FCC (the "Effective Date"), Verizon will stop accepting new orders for Grandfathered Services (including requests for moves, adds, or any other changes to existing services). Existing customers of Grandfathered Services may continue to receive existing Grandfathered Services, subject to the terms set forth below.

- On or after December 31, 2014, Verizon plans to discontinue the Grandfathered Services. Verizon will provide customers who purchase Grandfathered Services on a month-to-month or a daily basis advance written notice before discontinuing a Grandfathered Service.
- If you are subscribed by contract to a Grandfathered Service on the Effective Date, Verizon will continue to provide you with the Grandfathered Service until either you cancel the Grandfathered Service or Verizon terminates the Grandfathered Service in accordance with applicable contractual obligations.

- You may cancel your Grandfathered Services at any time.

Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Grandfathered Services offered by Verizon. The alternative services include the following:

- *Private IP (PIP) Service.* PIP service is a network-based virtual private network (VPN) enabling customers to communicate effectively over a secure network. It also provides a foundation for automating business processes between companies, including e-commerce, shared intranets, and extranets.
- *Ethernet Services.* Several Ethernet alternatives are available with local, national and international capability, including the following:
  - *Ethernet Virtual Private Line (EVPL) – Converged Packet Architecture (CPA).* This EVPL service is a point-to-point Ethernet service. Converged Packet Architecture (CPA) is a Multi-Protocol Label Switching (MPLS)-based network that allows configuration of point-to-point, point-to-multipoint, or partial mesh designs to meet evolving data transport needs.
  - *Ethernet Virtual Private Line (EVPL) – Switched Ethernet Service (SES).* This EVPL service is a point-to-point Ethernet service. Switched Ethernet Service (SES) is a fiber-based, metropolitan area Ethernet service that connects customer locations together using Ethernet interfaces of 10, 100, 1,000 or 10,000 Mbps.
  - *Ethernet Private Line (EPL) Service.* EPL service uses Ethernet over SONET to provide dedicated point-to-point Ethernet connectivity between two locations. EPL circuits provide solutions for customers who require high-speed, low latency and secure Ethernet wide area network (WAN) connectivity.

It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

Verizon Enterprise Solutions

*FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) 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 them 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 Verizon New England Inc.; Verizon New York Inc.; Verizon Pennsylvania LLC; Verizon Virginia LLC; Verizon Washington, DC Inc.; Verizon Maryland LLC; Verizon North LLC; Verizon California Inc.; and GTE Southwest Incorporated (d/b/a Verizon Southwest). Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.*