



Brian Benison
Director
Federal Regulatory

AT&T Services Inc. T: 202.457.3065
1120 20th Street, NW F: 202.457.3070
Suite 1000
Washington, DC 20036

April 1, 2015

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WC Docket No. 13-39

Dear Ms. Dortch:

AT&T Services, Inc. hereby provides this one-time letter notification for its affiliates, SBC Services, Inc. and SBC Communications Inc. (together, "SBC Long Distance"), in accordance with the Commission's rural call completion rules. *See Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154, para. 67 (2013). SBC Long Distance does not satisfy the definition of "Covered Provider" under the rules. 47 C.F.R. § 64.2101(c). SBC Long Distance provides service to more than 100,000 domestic retail long-distance subscriber lines but it does not make the "initial long-distance call path choice" as defined in the rules. *Id.* § 64.2101(d). SBC Long Distance hands traffic to two intermediate providers: (1) the AT&T Core Network; and (2) Level 3 Communications. The routing of calls to one of these intermediate providers is determined based on the calling party (*i.e.*, all calls from a particular calling party are routed to the predetermined intermediate carrier for that customer) and is not based on the "called number of the individual call." *Id.* To the extent that the AT&T Core Network is the intermediate provider, that traffic is within the scope of the waiver applicable to the AT&T Core Network. *See Rural Call Completion et al.*, WC Docket No. 13-39, Order, DA 15-147, para. 38 (WCB 2015). AT&T is also providing a copy of this letter to Level 3.

If there are any questions regarding this matter or additional information is required, please contact the undersigned at 202-457-3065.

Sincerely,

/s/ Brian J. Benison

Brian Benison
Director, Federal Regulatory

cc: Angie Linnell, Level3 Communications L.L.C