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is our business.

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Greenbelt, Maryland 20770  
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VIA ECFS

September 1, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Section 63.71 Application of S&A Telephone Company, Inc. for Authority to  
Discontinue Certain Services

JSI respectfully files the enclosed Application of S&A Telephone Company, Inc.  
for Authority to Discontinue Certain Services. This filing is made in compliance with  
Section 63.71 of the Commission's rules (47 C.F.R. § 63.71).

Sincerely,

Valerie Wimer  
Vice President

on behalf of

Janet Bathurst  
General Manager  
S&A Telephone Company, Inc.

Enclosures

cc: Ms. Janet Bathurst, General Manager  
S&A Telephone Company

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-512

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
)  
Section 63.71 Application of ) Comp. Pol. File No. \_\_\_\_\_  
S&A Telephone Company, Inc. )  
For Authority to Discontinue )  
Certain Services )

**SECTION 63.71 APPLICATION**

Pursuant to Sections 63.71 of the Commission's Rules<sup>1</sup> and Section 214(a) of the Communications Act of 1934, as amended,<sup>2</sup> S&A Telephone Company, Inc. ("S&A" or the "Company") hereby files this application to discontinue the provision of select operator services to customers that the Company serves in the State of Kansas ("Application").<sup>3</sup> In support of this Application, S&A submits the following:

**I. Information Required by Section 63.71(a)(1) - (4)**

**A. Name and Address of Carrier**

S&A Telephone Company, Inc.  
P.O. Box 68  
413 Main Street  
Allen, KS 66833-0068

For purposes of this Application, the Commission may contact:

Janet Bathurst  
General Manager  
S&A Telephone Company, Inc.  
413 Main Street  
Allen, KS 66833-0068  
620-528-3223  
jbathurst@satelephone.com

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<sup>1</sup> See 47 C.F.R. § 63.71.

<sup>2</sup> See 47 U.S.C. § 214(a).

<sup>3</sup> As required by Section 63.71(a) of the Commission's Rules, S&A has notified and submitted a copy of this Application concurrent with this filing to the Kansas Corporation Commission, the Governor of Kansas, and the Secretary of the Department of Defense.

**B. Date of Planned Service Discontinuance**

S&A will discontinue operator-assisted Collect Calls, Bill to Third Number, Bill to Credit Card, Line Status Verification/Busy Line Verification and Busy Line Interrupt services to its customers in the State of Kansas on or after December 1, 2015, upon completion of all necessary federal and state regulatory approvals.

**C. Points of Geographic Areas of Service Affected**

Affected S&A local exchange customers are in the Company's service area of the Allen-Admire and Scranton exchanges.

**D. Brief Description of the Types of Service Affected**

In the areas referenced above, S&A provides the following services which will be discontinued (collectively, "Affected Services"):

- Collect Call - A billing arrangement by which the charge for a call may be reversed provided the charge is accepted at the called service point.
- Bill to Third Number - A billing arrangement by which an operator-assisted call may be charged to an authorized service point other than the service point originating the call or the service point where the call is terminated.
- Bill to Credit Card - A billing arrangement by which an operator-assisted call may be charged to an authorized credit card.
- Line Status Verification/Busy Line Verification – An operator service allowing the operator to confirm when a line is idle or in use.
- Busy Line Interrupt – An operator service allowing the operator to break into a conversation when a line is in use.

This discontinuance is limited to the Affected Services. Customers will continue to have access to all other current services without interruption.

**II. Brief Description of the Dates and Methods of Notice to All Affected Customers**

Notices were sent to all S&A local exchange customers as a bill insert by method of U.S. Mail on September 1, 2015. Please reference Exhibit A which is a sample copy of the Notice sent to the affected customers. S&A deemed the bill insert the most economic method of reaching its rural customers and printed the insert on distinctly colored paper to distinguish it from the billing statement and bring sufficient attention to the Notice.

**III. Status of Carrier**

S&A is an incumbent local exchange carrier and considered a dominant carrier with respect to the services that it proposes to discontinue in the State of Kansas.

**IV. Circumstances of Discontinuance**

The Company's discontinuance of the Affected Services was a business decision based on a lack of customer demand for the service. In the preceding 12 months, the Company has had no instances of a customer utilizing the Affected Services. Therefore, the discontinuance of these services will not adversely affect the Company's customers.

**V. Certification**

On behalf of S&A Telephone Company, I, the undersigned General Manager, Janet Bathurst, hereby certify that the statements contained herein are true, complete and correct to the best of my knowledge and made in good faith.

**VI. Conclusion**

For the reasons stated herein, the Company respectfully requests grant of this Application.

Respectfully Submitted,



Janet Bathurst  
General Manager  
S&A Telephone Company, Inc.  
413 Main Street  
Allen, KS 66833-0068  
620-528-3223  
[jbathurst@satelephone.com](mailto:jbathurst@satelephone.com)

9/1/15

Date

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application was served this 1st day of September, 2015, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below.

Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Office of Governor Sam Brownback  
State of Kansas  
Capitol, 300 SW 10<sup>th</sup> Ave., Ste. 241S  
Topeka, KS 66612-1590

Secretary of Defense  
Attn: Special Assistant for Telecommunications,  
Pentagon  
Washington, DC 20301

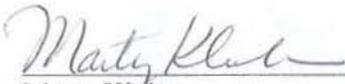
  
Marty Kluth

EXHIBIT A

CUSTOMER NOTICE



413 Main St. \* Allen, KS \* 66833

September 1, 2015

RE: FCC-Required Notice of Discontinuance of Certain Operator Services

Dear Valued Customer:

This letter is to inform you that on or after December 1, 2015, S&A Telephone will no longer be providing certain operator services within the state of Kansas. Customers who attempt to utilize the discontinued services will be informed by the operator that the service is not available. Specifically, the following operator services will be discontinued.

- Collect Call - A billing arrangement by which the charge for a call may be reversed provided the charge is accepted at the called service point.
- Bill to Third Number - A billing arrangement by which an operator-assisted call may be charged to an authorized service point other than the service point originating the call or the service point where the call is terminated.
- Bill to Credit Card - A billing arrangement by which an operator-assisted call may be charged to an authorized credit card.
- Line Status Verification/Busy Line Verification – An operator service allowing the operator to confirm when a line is idle or in use.
- Busy Line Interrupt – An operator service allowing the operator to break into a conversation when a line is in use.

This discontinuance is limited to the above operator services and will not affect your S&A Telephone service in any other way. Customers will continue to access general operator services, including operator assisted dialing, handling sent-paid calls, handling emergency calls and providing rate quotes where available.

The FCC 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. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may 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 S&A Telephone 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.

If you have any questions about this notice or S&A Telephones discontinuance of the aforementioned operator services, please contact us at 800.626.8859.

We thank you for your business and look forward to continuing to serve your communications needs.

Sincerely,  
S&A Telephone