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September 17, 2015

**Via Electronic Filing**

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

Re: Section 63.71 Application of Sprint Communications Company L.P. to  
Discontinue Wireline Consumer Long-Distance Services and Associated Features,  
WC Docket No. 15-186 and Comp. Pol. File No. 1230

Dear Ms. Dortch:

Sprint Communications Company L.P. (“Sprint”) writes to further supplement the record in the above-referenced proceeding regarding its application seeking authority to discontinue its provision of Sprint wireline consumer long-distance services and associated features.<sup>1</sup> In particular, Sprint hereby responds to the letters filed by individuals concerning the discontinuance application, all of which principally concern the availability of comparable, inexpensive alternative long-distance service.

Sprint reached out to each of the ten commenting individuals to provide them with additional information regarding the numerous available options for obtaining replacement services at acceptable rates from alternative providers. Sprint has connected with all but one of these commenters,<sup>2</sup> and has been able to discuss and address their concerns directly. Several of these individuals indicated that they already had transferred their service to a new provider, thereby demonstrating the availability of acceptable alternatives. Although others expressed reservations regarding the alternative options, generally due to their positive experiences with Sprint, none of the commenters requested a delay in the discontinuance of service, and many of them expressed appreciation that Sprint reached out to discuss the matter.

Although Sprint no longer is in a position to continue serving these customers, no one could plausibly contend that consumers today do not have an array of choices to meet their voice

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<sup>1</sup> Section 63.71 Application of Sprint Communications Company L.P., WC Docket No. 15-186 (June 19, 2015) (“Application”).

<sup>2</sup> Sprint found that one individual’s phone number was no longer active.

service needs, including the need for long-distance services. As Sprint noted in the above-referenced application, consumers easily can obtain alternative services from other wireline interexchange carriers and may purchase substitute long-distance services and features from wireless carriers such as Sprint or from a host of other alternative providers, such as interconnected voice over Internet protocol providers. Indeed, the fact that only ten out of well over 100,000 affected consumers, all of whom received direct notice by first-class mail, submitted comments in response to the proposed discontinuance buttresses the conclusion that suitable alternatives are available. The claims advanced by the few commenting individuals regarding the adequacy or availability of alternative long-distance services thus do not provide a sufficient basis for denying automatic approval of the discontinuance application.

In addition to these claims, two individuals raised other concerns that also do not constitute a basis for delaying grant of authority for Sprint to discontinue service. First, Rob Krenzel asserted that Sprint's customer notification letter did not include the appropriate title of the proceeding or a docket number. In fact, Sprint's customer notification letter fully complied with the Commission's rules. Specifically, Sprint's notification correctly instructed customers who wish to comment to "include in your comments a reference to the § 63.71 Application of Sprint Communications Company L.P."<sup>3</sup> The Commission does not require that docket numbers be included in this letter, presumably because the FCC does not assign docket numbers to discontinuance proceedings until *after* the customer notification has been given.<sup>4</sup> Second, Donovan Duggan described a potential slamming problem he encountered while researching the long-distance rates of another carrier. Sprint sympathizes with Mr. Duggan, but does not have any control over the actions of any other carrier. Accordingly, we respectfully submit that this aspect of his letter is unrelated to Sprint's proposed discontinuance.<sup>5</sup>

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The Commission normally will authorize a discontinuance of voice service unless it is shown that customers would be unable to receive service or a "reasonable substitute" from another

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<sup>3</sup> See 47 C.F.R. § 63.71(a)(5)(i) (requiring a statement in the notification letter advising affected customers to "include in your comments a reference to the § 63.71 Application of (carrier's name)"); Sprint's sample customer notice letter, appended to Section 63.71 Application of Sprint Communications Company L.P. as Attachment A, at 1-2.

<sup>4</sup> See 47 C.F.R. § 63.71(b) (requiring companies to file a discontinuance application with the FCC "on or after" the date on which all customer notice letters have been sent).

<sup>5</sup> Noting his continued worry that unauthorized charges will appear on his bill, Mr. Duggan also suggested that "the FCC's intervention may help prevent this unwarranted occurrence." Of course, the FCC already has intervened in an effort to prevent such occurrences, promulgating rules against both slamming (the unauthorized change of a customer's service provider) and cramming (the inclusion of unauthorized charges on a customer's bill). See 47 C.F.R. §§ 64.1100-1195 and §§ 64.2400-2401.

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carrier, or that the public convenience and necessity otherwise would be adversely affected.<sup>6</sup> Here, there are ample services and “reasonable substitutes” available to affected customers, and the overwhelming majority of Sprint’s affected customers have not expressed concerns about the discontinuance. Moreover, Sprint has addressed the individual concerns that have been raised. Sprint respectfully submits, therefore, that the Commission should permit its application to be granted automatically on September 19, as set out in the Public Notice.<sup>7</sup>

If there are any questions regarding this supplement, please do not hesitate to contact me.

Respectfully submitted,

/s/ Keith Buell

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**SPRINT CORPORATION**

cc: Kimberly Jackson  
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<sup>6</sup> 47 C.F.R. § 63.71(a)(5)(i), (ii).

<sup>7</sup> Public Notice, *Comments Invited on Application of Sprint Communications Company L.P. to Discontinue Domestic Telecommunications Services*, WC Docket No. 15-186, Comp. Pol. File No. 1230, DA 15-935, at 1-2 (rel. Aug. 19, 2015).