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REDACTED-FOR PUBLIC INSPECTION

November 4, 2015

Ms. Marlene Dortch  
Secretary  
Federal Communications  
Commission 445 12th Street S.W.  
Room TW-A.325  
Washington, DC 20554

Re: In the Matter of Technology Transitions and AT&T Petition to Launch  
a Proceeding Concerning the TDM-to-IP Transition, GN Docket No.  
13-5; GN Docket No. 12-353 PUBLIC VERSION

Dear Ms. Dortch:

On behalf of AT&T and pursuant to Second Protective Order adopted in the above-referenced proceedings,<sup>1</sup> please find enclosed two copies of the Redacted version of AT&T's Section 214 Application to be filed in the above-captioned proceeding.

Also pursuant to the Second Protective Order, two copies of the highly confidential version of the attached application will be delivered to Jonathan Reel of Competition Policy Division, and one copy of the highly confidential of this letter are being filed with the Secretary's office under separate cover. In addition, one machine-readable copy of the redacted version of this letter will be filed electronically via ECFS in the above referenced dockets and the Section 214 mailbox.

Respectfully submitted,

*/s/ Terri Hoskins*  
Terri Hoskins

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<sup>1</sup> Second Protective Order, In re Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353(rel. Feb. 27, 2014) ("Second Protective Order").

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

Section 63.71 Application of	)	
	)	File No.
BellSouth Telecommunications, LLC d/b/a	)	
AT&T Southeast	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, As Amended,	)	
To Discontinue the Provision of Service	)	
	)	
	)	
In the Matter of	)	GN Docket No.13-5
Technology Transitions	)	
	)	
AT&T Petition to Launch a Proceeding	)	GN Docket No. 12-353
Concerning the TDM-to-IP Transition	)	

**SECTION 63.71 APPLICATION OF BELLSOUTH TELECOMMUNICATIONS, LLC  
D/B/A AT&T SOUTHEAST**

AT&T Services, Inc., on behalf of its affiliate, BellSouth Telecommunications, LLC d/b/a AT&T Southeast (“AT&T”), applies for authority under Section 214(a) of the Communications Act, as amended (“the Act”), 47 U.S.C. § 214, Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. §63.71, and pursuant to the Commission’s *Technology Transitions Order*<sup>1</sup> to grandfather the BellSouth Analog Voice Grade

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<sup>1</sup> *Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353; Connect America Fund, WC Docket No. 10-90; Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; Numbering Policies for Modern Communications, WC Docket No. 13-97, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5, 29 FCC Rcd 1433 (2014).*

REDACTED-FOR PUBLIC INSPECTION

Private Line services in the Carbon Hill, AL, serving wire center and in the Kings Point, FL, serving wire center. (the AT&T IP-Trial wire centers).<sup>2</sup>

As required by Section 63.71(a) and (b) of the Commission's rules, AT&T provides the following information:

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

BellSouth Telecommunications, LLC d/b/a AT&T Southeast  
675 W Peachtree Street NW, Atlanta GA 30308

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

AT&T plans to discontinue offering this service to new customers in the AT&T IP-Trial wire centers on or after February 16, 2016, pending regulatory approval.

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

Carbon Hill, AL, serving wire center and Kings Point, FL, serving wire center.

**Brief Description of Type of Service Affected (47 C.F.R. § 63.71(a)(3), b(2)):**

BellSouth Analog Voice Grade Private Line services are legacy TDM-based services that provide an analog channel for the transmission of asynchronous, or synchronous serial data at rates of up to 19.2, 50.0, or 230.4 Kbps. AT&T also offers optional arrangements for this service at 18.74 or 40.08 Kbps. (See BellSouth Telecommunications Tariff, FCC No. 1, Sections 7.2.3 and 23.5.2.3).

The public convenience and necessity will not be impaired by the grandfathering of this service because there is no customer demand for this service in the Trial Wire Centers, and AT&T offers IP-based replacement services that provide the same functionality over a more

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<sup>2</sup> The boundaries of the AT&T IP-Trial Wire Centers are set forth in Exhibit A to AT&T's Proposal for Wire Center Trials; *Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to IP Transition, GN Docket No. 12-353*; filed February 28, 2014.

flexible architecture. AT&T has no customers that currently subscribe to this service in the Trial Wire Centers.<sup>3</sup> AT&T currently offers AT&T Switched Ethernet 2.0 Mbps (ASE 2.0) service and AT&T Business DSL Internet service (IPDSL) as replacements for Analog Private Line services. AT&T's ASE 2.0 Mbps service is an Ethernet transport services that offers a variety of configurations to meet customers' needs. AT&T also offers IPDSL service, which is a high speed Internet service for small to medium businesses that allows customers to send and receive data over existing telephone lines.

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

AT&T has no customers that currently subscribe to this service. Copies of this Application are being sent, first class U.S. Mail, to the public utilities commission and governor of each state in which discontinuance is proposed and also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.<sup>4</sup>

**Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):**

AT&T offers Analog Voice Grade Private Line services pursuant to dominant carrier regulation. Questions about this application may be addressed to Dave Talbott, AT&T Services, Inc., Asst. Vice-President - Federal Regulatory, 1120 20th Street N.W., Suite 1000, Washington, D.C. 20036, (202) 457-3039.

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<sup>3</sup> As of October 30, 2015, AT&T had [Start Highly Confidential Information] [End Highly Confidential Information] that subscribe to BellSouth's *intrastate* Analog Voice Grade Private Line service. AT&T is following the applicable state regulatory processes to grandfather the intrastate Analog Voice Grade Private Line services.

<sup>4</sup> Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

**Conclusion:**

The public convenience and necessity will not be adversely affected by the grandfathering of this service because there is no demand in the Trial Wire Centers for this service, and AT&T has other products available to serve low capacity data needs. AT&T respectfully requests that the Commission approve its Section 63.71 Application to grandfather this service.

Respectfully submitted,

By: /s/Terri L. Hoskins

Terri L. Hoskins  
Christopher Heimann  
Gary L. Phillips  
David Lawson

AT&T Services, Inc.  
1120 20<sup>th</sup> Street NW  
Suite 1000  
Washington, DC 20036

*Its Attorneys*

November 4, 2015

**CERTIFICATE OF SERVICE**

I, Loretia Hill, certify that I have, on November 4, 2015, served a copy of the foregoing Section 63.71 Application of BellSouth Communications LLC., d/b/a AT&T Southeast by U.S.

Mail postage prepaid to the addresses below:

/s/Loretia Hill

Loretia Hill

Alabama Public Service Commission  
100 N. Union Street  
Suite 850  
Montgomery, AL 36130

Office of the Governor  
State Capitol  
600 Dexter Avenue  
Montgomery, AL 36130

Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Office of the Governor  
The Capitol  
Tallahassee, FL 32399-0001

Department of Defense Chief Information Officer  
Attn: Military Asst./Mobility Team  
The Pentagon  
Washington, D.C. 20301