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January 8, 2016

Ex Parte

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

Re: Section 63.71 Application of MCI Communications Services, Inc. d/b/a Verizon Business Services and TTI National Inc. to Discontinue Postpaid Calling Card and Personal 800 Service, WC Docket No. 15-314

Dear Ms. Dortch:

I write to supplement the record in the application of MCI Communications Services, Inc. d/b/a Verizon Business Services and TTI National Inc. (collectively, "MCI") to discontinue postpaid calling card service and personal 800 service.[1] In particular, MCI responds to the three letters filed by individuals concerning the discontinuance application, all of which primarily concern the availability of comparable alternative services.

As technology has evolved, both postpaid calling card service and personal 800 service usage have declined significantly. The rapid adoption of mobile products and equipment as well as the popularity of competitively priced prepaid calling cards have led to significant reductions in customer use of these services. For example, in 2014, of the more than 300,000 MCI calling cards then in service, only approximately 7500 showed any usage within the preceding 24 months. By late 2015, only approximately 5500 of these cards had been used within the preceding 24 months, a 30 percent decline. Customers' use of personal 800 service is similarly low. In 2014, of the more than 215,000 accounts that had personal 800 service, fewer than 1000 had used it within the preceding 24 months. In fact, use of these services has declined in popularity so much that, since 2012, revenue from customers using MCI's postpaid calling cards has decreased nearly 75 percent; revenues from use of personal 800 service has decreased more than 65 percent.

And as customers have stopped using postpaid calling card and personal 800 services, they have migrated to other options. For example, alternatives to the MCI postpaid calling cards include national and international prepaid calling cards offered by many providers including Verizon and

[1] Section 63.71 Application of MCI Communications Services, Inc. d/b/a Verizon Business Services and TTI National Inc. to Discontinue Postpaid Calling Card and Personal 800 Service, WC Docket No. 15-314 (Nov. 16, 2015) ("Application").

AT&T. Prepaid cards from some providers are widely available, including at some convenience or grocery stores.

Similarly, alternatives to personal 800 service include paid traditional 800 service. Unlike MCI's personal 800 service, in which customers share access to a toll free number and "may not retain the toll free number or any right therein when [their] Personal 800 service is discontinued,"[2] a traditional 800 number service assigns a customer an 800 number that they may port to another carrier. Carriers such as AT&T offer services like "Easy Reach 800 service" to residential customers, which may be an option for some consumers. Other providers such as eVoice, FreedomVoice, and Grasshopper offer 800 numbers for small business. And there are also third party providers who offer collect calling options through a dial-around or other access number.

Further, there are now many cross-platform products that provide comparable services. These include products like Skype, FaceTime, and VoIP calling, which do not necessarily require availability of cellular coverage but may work if there is WiFi or a broadband connection. Alternately, many mobile telephone and phone plans can be used for long distance or international calls without additional charges. There also exist mobile calling applications that enable collect calling.

In response to the three customer comments filed, we reached out to each of these customers to provide them with additional information regarding the multiple options available for obtaining replacement services at acceptable rates from alternative providers. In conversations with two of these customers, we explained the alternatives and discussed options. We have made multiple attempts by telephone to reach the remaining commenter, but that customer does not appear to have voice mail or an answering machine on which to leave a message. Since we have been unable to reach the customer by telephone, we have sent a letter requesting the customer call us to talk about the alternative services available.

Given the declining usage of these services and the multiple options available to consumers, it is in the public interest for the Commission to allow this application to be granted in the ordinary course. The very few customer comments filed do not provide a basis for concluding that discontinuing these services would impair the public convenience or necessity.

Sincerely,

cc: Rodney McDonald
Kimberly Jackson

[2] http://consumer.mci.com/mci_service_agreement/res_pdf/GSA_Res_Eng.pdf