Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Section 63.71 Application of	)	WC Docket No. 16-13
	)	
	)	Comp Pol. File No. 1274
AT&T Alaska,	)	
AT&T Communications of Indiana, LLC,	)	
AT&T Communications of New York, Inc.,	)	
AT&T Communications of Texas, LLC	)	
AT&T Communications of Virginia, LLC,	)	
AT&T Corp.,	)	
BellSouth Telecommunications, LLC,	)	
BellSouth Long Distance,	)	
Illinois Bell Telephone Company,	)	
Indiana Bell Telephone Company, Inc.,	)	
Michigan Bell Telephone Company,	)	
Nevada Bell Telephone Company,	)	
The Ohio Bell Telephone Company,	)	
Pacific Bell Telephone Company,	)	
SBC Long Distance,	)	
Southwestern Bell Telephone Company,	)	
Teleport Communications of America, LLC,	)	
Teleport Communications Group, and	)	
Wisconsin Bell, Inc.	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, As Amended,	)	
To Discontinue the Provision of Service	)	

REPLY COMMENTS OF AT&T

On January 6, 2016, AT&T Services, Inc. on behalf of the above-referenced affiliates filed an application, pursuant to section 214 of the Communications Act and section 63.71 of the Commission's rules to discontinue offering the following operator services: collect calling, person-to-person calling, billed to third party, busy line verification, busy line interrupt and international directory assistance ("Application"). The

thirteen comments filed in response to this application were concerned with the continued availability of busy line verification/interrupt (BLV/I), collect calling and international directory assistance.[1] AT&T sent a letter to each commenter to respond to their specific concerns. AT&T explained its reasons for discontinuing these services, and provided information on the alternative services, resources or applications that are available to replace these services.[2] As discussed below, none of the comments filed demonstrate that the public convenience and necessity will be impaired as a result of AT&T's discontinuance of these services, and accordingly, AT&T's application to discontinue these services should be granted.

Eight of the thirteen comments filed in this proceeding were concerned with the continued availability of BLV/I services for emergency personnel.[3] Although AT&T is not aware of a replacement service for BLV/I functionality that is provided on legacy TDM voice services, the market indicates that there is no need for a replacement service. As AT&T indicated in its Application, new technologies as well as new products and services have rendered BLV/I services unnecessary and obsolete. Customers use more modern (and often more economical) technologies to inform them when someone is trying to call them

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[1] Although thirteen written comments were filed, one commenter filed two comments. See Comments of Dr. S. Yost filed on October 26, 2015 and December 2, 2015.

[2] In addition to sending letters, AT&T also attempted to contact each commenter by phone. AT&T made multiple attempts to reach each commenter, but was unable to reach 7 of the 12 commenters. (AT&T was unable to reach Mr. B. Heck, Mr. W. Brodkin, Ms. K. Myers, Mr. J. Morgan, Mr. M. Maier, Mr. W. Huddleson, and Dr. S. Yost). AT&T believes that its letters resolved the issues that were raised by each comments, and obtained verbal confirmation that their issues were resolved by 4 of the commenters (Mr. K. Hatton, Ms. S. Maliska, Ms. M. Valentine, and Ms. Schlotterbeck).

[3] *See* Comments of M. Valentine filed 12/3/2015, M. Maier filed 2/08/2016, J. Morgan filed 2/8/2016, K. Myers filed 2/5/2016, G. Turner filed 1/29/2016, K. Hatton filed 1/27/2016, B. Heck filed 1/22/2016, and W. Brodkin filed 1/15/2016.

or determine when a telephone line is in use, such as caller ID, call waiting, voicemail, texting, instant messaging, wireless calls and emails.

In addition, by the end of this year *only 14%* of the housing units in the states in which AT&T is deemed the incumbent telephone company (ILEC) will purchase residential basic local phone service from an incumbent telephone company.[4] Virtually all other households that purchase voice service will have voluntarily transitioned to an alternative service, such as digital voice (e.g. VoIP) or mobile voice services, — none of which offer BLV/I. The fact that so many consumers have switched to alternative voice services that do not offer BLV/I capabilities confirms that those services provide a reasonable and adequate alternative to voice services that offer those capabilities.

Consumers preference for alternative services is further confirmed by the infinitesimally small number of requests for BLV/I services. In 2013, AT&T Corp. (AT&T's affiliate that provides BLV/I services on a national basis) received an average of less than 10 requests per month. To be clear, this number reflects the total number of BLV/I requests that AT&T Corp. received from the general public as well as requests from public safety officials. It is clear from the extremely small demand that AT&T's customers including public safety officials use other options to determine whether a telephone line is in use.

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[4] *See* Attachment A, Statewide Change in Housing Units and ILEC Residential Lines AT&T States, December 1999 - December 2015. This data includes all ILEC lines that operate in the same states as AT&T's ILECs; *See also* Voice Competition Data Support Regulatory Modernization, *By Patrick Brogan, U.S. Telecom, Vice President of Industry Analysis., dated November 24, 2014,* http://www.ustelecom.org/sites/default/files/documents/National%20Voice%20Competition%202014_0.pdf (last checked March 7, 2016) (Reports that traditional landlines were approaching 20 percent of households and this figure will drop toward 15 percent over the next couple of years (Chart 1), and by the end of 2015, ILEC switched connections will represent 11 percent of U.S. voice connections (Chart 3)).

AT&T's experience is very similar to other LECs that have already discontinued BLV/I services. For example in 2015, Waldron Telephone Company discontinued its operator services including BLV/I throughout its service territory in Michigan due to lack of customer demand, and stated that it's "operator services time for the preceding 12 months total[ed] only 13.8 minutes."[5] Similarly, in 2013 Verizon's local exchange carrier affiliates discontinued BLV/I services throughout their service territories in California, Massachusetts, Rhode Island, New York, Connecticut, New Jersey, Pennsylvania, Delaware, Maryland, Texas, Florida, Virginia, North Carolina, and the District of Columbia, and noted that since 2002, it had experienced "more than a 93% decline in Busy Line Verification and Busy Line Verification with Interrupt usage."[6] Based on AT&T review of recent FCC filings, over twenty LECs discontinued these services in 2015 alone.[7]

To address the unique needs of public safety officials, AT&T has made special provisions for Public Service Agency Providers (PSAPs) to contact AT&T Security in

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[5] *See* Section 63.71 Application of Waldron Telephone Company to Discontinue Certain Services, WC Docket No. 15-109, Comp. Pol. File No. 1217, filed April 24, 2015.

[6] *See* Section 63.71 Application of Verizon Incumbent Local Exchange Companies, WC Docket 13-21, Comp. Pol. File No. 1076 filed December 21, 2012.

[7] *See* Riviera Telephone Co., WC Docket No. 15-325 and Comp. Pol. File No. 1268; Electra Telephone Co., WC Docket No. 15-316 and Comp. Pol. File No. 1266; Northeast Florida Telephone Co., WC Docket No. 15-317 and Comp Pol. File No 1267; DoveTel Comm., WC Docket No. 15-299; Progressive., WC Docket No. 15-272 and Comp Pol. File No 1252 ; Trenton Telephone Co., WC Docket No. 15-251 and Comp Pol. File No 1250; Pigeon Telephone Co., WC Docket No. 15-226 and Comp Pol. File No 1241; Livingston Telephone Co., WC Docket No. 15-228 and Comp Pol. File No 1244 ; S&A Telephone Co., WC Docket No. 15-229 and Comp Pol. File No 1245; Telephone Electronics Corp. on behalf of Bay Springs Communications, Bay Springs Telephone Co., Crocket Telephone Co, National Telephone of Alabama, Peoples Telephone Co., Roanoke Telephone Co., TEC of Jackson, West Tennessee Telephone Co. WC Docket No. 15-208; Mid-Plains Rural Telephone Coop., WC Docket No. 15-205 and Comp Pol. File No 1238; Sprint Comm., WC Docket No. 15-186 and Comp Pol. File No 1230 ; ACOMM, Inc., WC Docket No. 15-176 and Comp Pol. File No 1232; Carr Telephone Co., WC Docket No. 15-161 and Comp Pol. File No 1224; Ogden Telephone Co., WC Docket No. 15-160 and Comp Pol. File No 1223; Rye Telephone Co., WC Docket No. 15-150 and Comp Pol. File No 1228; Waldron Telephone Co., WC Docket No. 15-109 and Comp Pol. File No 1217.

emergency situations when assistance is needed with an AT&T-provided service.[8] AT&T Security has been advised of the company's plans to discontinue BLV/I, and is prepared to assist PSAPs with AT&T's voice services, as they do today. Although AT&T Security will not have the capability to verify or interrupt a line, it will be able to utilize other tools at their disposal to assist. As a result, the public convenience and necessity will not be impaired by AT&T's discontinuance of BLV/I service.

Just three commenters expressed concern regarding AT&T's withdrawal of collect calling service.[9] But, as with BV/I services, AT&T has experienced significant decreases in demand for collect calling due to the proliferation of wireless phones, which has obviated the need for collect calling services. In this regard, the Centers for Disease Control reported in 2015 that 47% of U.S. households have "cut the cord" and only utilize mobile phone service, which do not terminate collect calls.[10] In any event, alternative services continue to be available for any remaining customers that may want to place collect calls, such as 1-800-COLLECT and prepaid/post-paid calling cards. Consequently, the public convenience and necessity will not be impaired by AT&T's withdrawal of this service.

One commenter incorrectly assumed that AT&T's discontinuance of collect calling would cut-off communications between prison inmates and their family.[11] However, most

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[8] AT&T Security is staffed 24 hours per day, 7 days per week. They have contact information for all PSAP and other public safety organizations and can readily determine whether a call is from a legitimate public safety entity.

[9] *See* Comments of L. Schletterbeck filed 12/4/2015, S. Maliska filed 12/07/2015, G. Turner filed 1/29/2016.

[10] Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, July–December 2014, U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, Released June, 2015.

[11] Comments of G. Turner filed 01/29/2016.

jails and prisons contract with Inmate Calling Service (ICS) providers to provide phone service to inmates. ICS providers have responded to the changes in the telecom market, and generally utilize debit and pre-paid accounts rather than collect calling, and where state regulations restrict inmates to collect calls, other companies, such as 1-800-COLLECT, continue to offer this service. Thus, AT&T's discontinuance of collect calling will not impact the communications inmates have with their families.

AT&T has also experienced very large year-over-year decline in demand for International Directory Assistance (IDA) service. For example, AT&T experienced a 43% decline in demand for IDA from 2012 – 2013. Aside from the decline in demand, there are unique issues associated with IDA that have rendered this service obsolete. Specifically, AT&T does not own foreign directory listings and therefore, AT&T's ability to provide IDA is limited by its ability to obtain telephone number listings from foreign carriers. In recent years, many carriers in foreign countries no longer provide directory assistance services.[12] For example, AT&T Corp. receives an average of 117 requests for international DA per month, but is only able to fulfill 0.3% of those requests (or 4 requests on an annual basis). Consequently, individuals are using the internet or other forms of technology to obtain and reach individuals or businesses in foreign countries. Since the decline in the availability of foreign directory listings is beyond AT&T's control, AT&T's Application to discontinue IDA should be granted.

Conclusion

As demonstrated above, the public convenience and necessity will not be adversely affected by the discontinuance of BLV/I, collect calling or international directory

[12] *See* Attachment B, List of foreign countries where AT&T is no longer able to obtain telephone listings.

assistance services because the vast majority of consumers already have replaced these services with other communications services and/or applications. AT&T respectfully requests that the Commission approve its Section 63.71 Application.

Respectfully submitted,

By:/s/ Terri L. Hoskins

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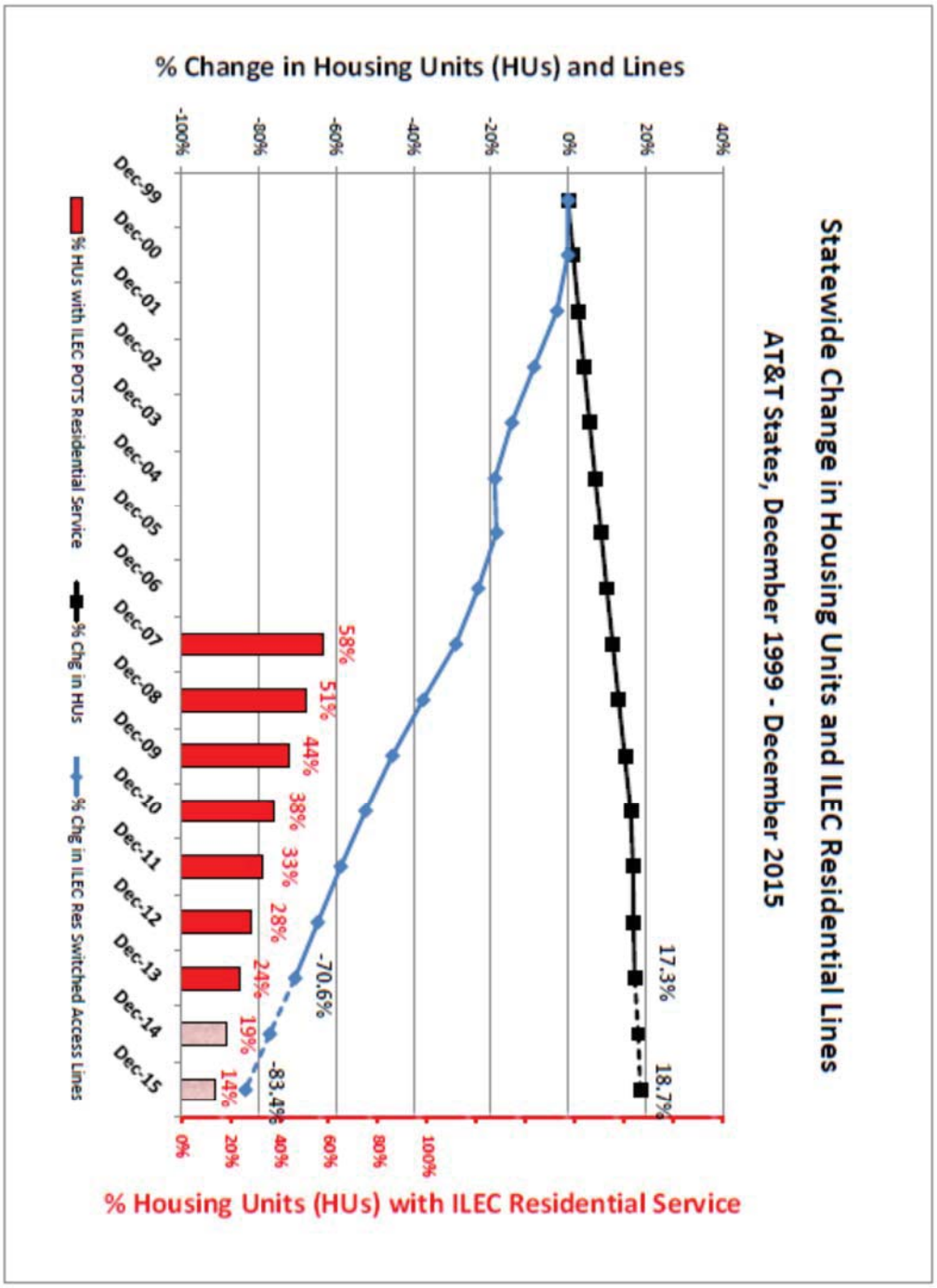
ATTACHMENT A



Data Source:
- ILEC Res Lines from FCC Local Telephone Competition Reports
- Housing Units are linear plots of values from 1990, 2000, 2010 Census plus ACS 2011 thru 2013 1 Yr Estimates
- Data for 2014 and 2015 are estimates using linear trending

ATTACHMENT B

AT&T is no longer able to obtain foreign telephone listings from operators in the countries listed below:

INTERNATIONAL DIR. ASSISTANCE 2 of 5

COUNTRY NAME	GEOGRAPHIC REGION
AFGHANISTAN	SOUTH CENTRAL ASIA
BANGLADESH	SOUTHEASTERN ASIA
BELGIUM	NORTHWESTERN EUROPE
CAMEROON	WESTERN AFRICA
COLUMBIA	SOUTH AMERICA
CUBA	CARIBBEAN OCEAN
DENMARK	NORTHERN EUROPE
DOMINICAN REP	CARIBBEAN OCEAN
EAST TIMOR	EASTERN INDIAN OCEAN
ESTONIA	NORTHEASTERN EUROPE
FAEROE ISLANDS	NE ATLANTIC OCEAN
FINLAND	NORTHERN EUROPE
FRANCE	SOUTHERN EUROPE
FRENCH GUIANA	SOUTH AMERICA
FRENCH POLYNESIA	SC PACIFIC OCEAN

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INTERNATIONAL DIR. ASSISTANCE 3 of 5

COUNTRY NAME	GEOGRAPHIC REGION
GAMBIA	WESTERN AFRICA
GHANA	WESTERN AFRICA
GUADALOUPE	CARIBBEAN OCEAN
HUNGARY	EASTERN EUROPE
INDIA	INDIAN SUB-CONTINENT
IRAN	MIDDLE EAST
ITALY	SOUTHERN EUROPE
IVORY COAST	WEST CENTRAL AFRICA
JAPAN	WESTERN PACIFIC
JORDAN	MIDDLE EAST
KENYA	EAST CENTRAL AFRICA
KYRGYZSTAN	CENTRAL ASIA
LIBYA	NORTHERN AFRICA
LUXEMBOURG	CENTRAL EUROPE
MALI	NORTHWESTERN AFRICA

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INTERNATIONAL DIR. ASSISTANCE 4 of 5

COUNTRY NAME	GEOGRAPHIC REGION
MARSHALL ISLANDS	SW PACIFIC OCEAN
MARTINIQUE	CARIBBEAN OCEAN
MICRONESIA	NORTH PACIFIC OCEAN
MONTENEGRO	SOUTHEASTERN EUROPE
MOROCCO	NORTWESTERN AFRICA
NEPAL	SOUTH ASIAN
NETHERLANDS	WESTERN EUROPE
NEW CALEDONIA	SW PACIFIC OCEAN
NEW ZEALAND	SW PACIFIC OCEAN
NIGERIA (REP OF)	WESTERN AFRICA
PAKISTAN	SOUTHERN ASIA
PALAU	SW PACIFIC OCEAN
PANAMA	CENTRAL AMERICA
PITCAIRN ISLAND	SC PACIFIC OCEAN
REUNION ISLAND	NORTHEASTERN AFRICA

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INTERNATIONAL DIR. ASSISTANCE 5 of 5

COUNTRY NAME	GEOGRAPHIC REGION
ROMANIA	SOUTHEASTERN EUROPE
SENEGAL	WESTERN AFRICA
SLOVAKIA	CENTRAL EUROPE
SPAIN	SOUTHWESTERN EUROPE
SWITZERLAND	WEST CENTRAL EUROPE
TONGA ISLANDS	SW PACIFIC OCEAN
TURKEY	SOUTH EASTERN EUROPE
UGANDA	EAST CENTRAL AFRICA
US VIRGIN ISLAND	CARIBBEAN OCEAN
SATELLITE REGION	
INMARSAT	N/A
IRIDIUM	N/A
THURAYA	N/A