Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

VIA ECFS

April 1, 2016

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

Re: Section 63.71 Application of Valley Telephone Cooperative, Inc. for Authority to Discontinue Certain Telecommunications Services

JSI respectfully files the enclosed Application of Valley Telephone Cooperative, 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

Valerie Wimer
Vice President

on behalf of

Dave Osborn
CEO
Valley Telephone Cooperative, Inc.

Enclosures

cc: Dave Osborn, CEO
Valley Telephone Cooperative, Inc.

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

In the Matter of	)	
	)	
Section 63.71 Application of	)	Comp. Pol. File No. _____
Valley Telephone Cooperative, Inc.	)	
For Authority to Discontinue	)	
Certain Services	)	

SECTION 63.71 APPLICATION

Pursuant to Sections 63.71 of the Commission's Rules[1] and Section 214(a) of the Communications Act of 1934, as amended,[2] Valley Telephone Cooperative, Inc. ("VTCI" or the "Cooperative") hereby files this application to discontinue the provision of select operator services, key system services and a packaged offering to customers that the Cooperative serves in the state of Texas ("Application").[3] In support of this Application, VTCI submits the following:

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

A. Name and Address of Carrier

Valley Telephone Cooperative, Inc.
881 East Hidalgo Avenue
Raymondville, TX 78580

For purposes of this Application, the Commission may contact:

Dave Osborn, CEO
Valley Telephone Cooperative, Inc.
881 East Hidalgo Avenue
Raymondville, TX 78580
(956) 642-1038
dave.osborn@vtx1.net

---

1 *See* 47 C.F.R. § 63.71.

2 *See* 47 U.S.C. § 214(a).

3 As required by Section 63.71(a) of the Commission's Rules, VTCI has notified and submitted a copy of this Application concurrent with this filing to the Public Utility Commission of Texas, the Governor of Texas, and the Secretary of the Department of Defense.

B. Date of Planned Service Discontinuance

VTCI will discontinue its Key System services and a packaged offering for residential customers that is currently available, "Valley Save-A-Bundle", as well as the following: operator-assisted collect calls; billed to a third number; credit card billed calls; line status verification; busy interrupt; and person-to-person services. These services will be discontinued on or after June 30, 2016, upon completion of all necessary federal and state regulatory approvals.

C. Points of Geographic Areas of Service Affected

The Cooperative provides the affected services throughout its service areas in seventeen exchanges and expanding across sixteen counties in the southeast portion of Texas.

D. Brief Description of the Types of Service Affected

In the areas referenced above, VTCI provides the following telecommunication 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.

- Billed to a 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 – An operator service allowing the operator to confirm when a line is idle or in use.

- Busy Interrupt – An operator service allowing the operator to break into a conversation when a line is in use.

- Person-to-Person - A service where the person originating the call specifies to the Cooperative, Inc. operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or a particular station, department or office to be reached through a PBX attendant.

- Key Trunk – a communications channel between the Company's central office equipment and an end user's Key System equipment, which allows users to control connections using line buttons that indicate the status of lines.

- "Valley Save-A-Bundle" Packaged Offering - a package including two residential local exchange access lines and the customer's choice of any or all calling features, per line for a set monthly rate.

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

Notices were sent to all VTCI local exchange customers as a direct mail notice by method of U.S. Mail on April 1, 2016. Please reference Exhibit A which is a sample copy of the Notice sent to the affected customers. VTCI 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

VTCI 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 Texas.

IV. Circumstances of Discontinuance

The Cooperative's discontinuance of the Affected Services was a business decision based on a lack of customer demand for these services. In the preceding 12 months, the Cooperative has had no instances of usage for the Operator Services. Also, in the last 12 months, the number of customers subscribing to the Cooperative's Key System service has gone from 35 to no customer subscriptions, and only 26 customers are currently subscribing to the residential packaged offering. Therefore, the discontinuance of these services will not adversely affect the Cooperative's customers.

V. Certification

On behalf of Valley Telephone Cooperative, Inc., I, the undersigned CEO, Dave Osborn, 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 Cooperative respectfully requests grant of this Application.

Respectfully Submitted,

Dave Osborn, CEO
Valley Telephone Cooperative, Inc.
881 East Hidalgo Avenue
Raymondville, TX 78580
(956) 642-1038
dave.osborn@vtx1.net

03/31/2016
Date

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application was served this 1st day of April, 2016, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below.

Public Utility Commission of Texas
Central Records
1701 N Congress
P.O. Box 13326
Austin, Texas 78711-3326

Office of Governor Greg Abbott
State of Texas
State Insurance Building/1100 San Jacinto
P.O. Box 12428
Austin, Texas 78711-2428

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

Kim Waldvogel

EXHIBIT A

CUSTOMER NOTICE

April 1, 2016

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

Dear Valued Customer:

This letter is to inform you that on or after June 30, 2016, Valley Telephone Cooperative, Inc. ("VTCI") will no longer be providing certain telecommunications services within the state of Texas. 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 a 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 – An operator service allowing the operator to confirm when a line is idle or in use.
- Busy Interrupt – An operator service allowing the operator to break into a conversation when a line is in use.
- Person-to-Person - A service where the person originating the call specifies to the Company operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or a particular station, department or office to be reached through a PBX attendant.

Customers who attempt to utilize the discontinued operator services will be informed by the operator that the service is not available. 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.
VTCI is also discontinuing two additional service offerings effective June 30, 2016, as described below:

- Key Trunk – a communications channel between the Company's central office equipment and an end user's Key System equipment, which allows users to control connections using line buttons that indicate the status of lines.
- "Valley Save-A-Bundle" - a package including two residential local exchange access lines and the customer's choice of any or all calling features.

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 Valley Telephone Cooperative, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your cooperative, including any inability to acquire reasonable substitute service.

If you have any questions about this notice or VTCI's discontinuance of the aforementioned operator services, please contact us at 881 East Hidalgo Avenue, Raymondville, TX 78580 or (956) 642-1038.

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

Sincerely,

Valley Telephone Cooperative, Inc.