



May 5, 2016

**VIA ECFS**

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

Re: Application of Broadview Networks, Inc. for Authority  
Under Section 214(a) of the Communications Act and  
Section 63.71 of the Commission's Rules

Dear Secretary Dortch:

On March 25, 2016, Broadview Networks, Inc. ("Broadview"), submitted an application for authority under Section 214(a) of the Communications Act, as amended (the "Act"), 47 U.S.C. §214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, to discontinue the provision of asymmetrical digital subscriber line service ("aDSL"), symmetrical digital subscriber line service ("sDSL"), ISDN-digital subscriber line service ("iDSL") and high-capacity DS-1 service ("DS1") (collectively, the "Services") to a limited number of customers served through certain central offices in Massachusetts, New York, Ohio and Pennsylvania. As of this date, no Public Notice concerning Broadview's application has been issued.

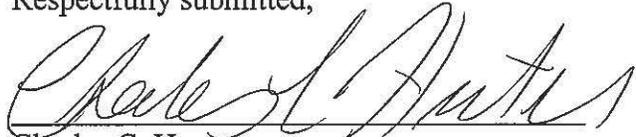
Today, Broadview has sent a supplemental notice to all affected customers providing additional details concerning the proposed discontinuance, including a revised anticipated implementation date for the discontinuance. A redacted version of Broadview's supplemental notice to customers is attached hereto as "Attachment A."

Copies of this letter filing have today also been sent to the Offices of the Governors and the Public Utility Commissions of the States of Massachusetts, Ohio, New York and Pennsylvania and to the Special Assistant for Telecommunications of the Secretary of Defense.

**MARLENE H. DORTCH, SECRETARY**  
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To the extent you have any questions concerning this submission, kindly contact the undersigned.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Charles C. Hunter".

Charles C. Hunter  
Executive Vice President, Secretary and  
General Counsel  
Broadview Networks, Inc.  
800 Westchester Avenue, Suite N-501  
Rye Brook, NY 10573

(914) 922-7589

# ATTACHMENT A



May 5, 2016

[Customer Name]  
[Customer Address]  
[Customer Address]

Re: Account Number xxxxxxxxxxxxxxxxxxxx

Dear [Customer Name],

As Broadview Networks ("Broadview") has previously advised you, [Customer Name's] xxxxxxxxxxxx Service will soon be impacted by the decision of one of Broadview's underlying carriers to decommission certain network facilities in the following Central Offices:

<u>Central Office CLLI Code</u>	<u>Central Office Abbreviation</u>	<u>Central Office City</u>	<u>Central Office State</u>
BLMTMALE	BELMONT	Belmont	Massachusetts
NYCKNYAL	NWYRCYZN06	Brooklyn	New York
FRPTNYFP	NASSAUZN06	Freeport	New York
GLCVNYGC	NASSAUZN04	Glen Cove	New York
HMPSPNYHS	NASSAUZN05	Hempstead	New York
LVTWNYLT	NASSAUZN08	Levittown	New York
MTVRNYMV	MT VERNON	Mount Vernon	New York
PSVLNYPV	PLEASANTVL	Pleasantville	New York
PTWANYPW	NASSAUZN01	Port Washington	New York
RSLNRYRO	NASSAUZN04	Roslyn	New York
NYCRNYND	NWYRCYZN14	Staten Island	New York
NRTNOH23	NOROYALTON	North Royalton	Ohio
PHLAPATR	PHLDLPHZN2	Philadelphia	Pennsylvania
PXVLPAPV	PHOENIXVL	Phoenixville	Pennsylvania

The network facilities to be decommissioned are IDSL, ADSL and SDSL services.

Broadview will be continuing to work with you to facilitate and simplify the planned transition which will be necessary to continue your xxxxxxxxxxxx Service uninterrupted. Broadview appreciates your assistance and cooperation as we accomplish the steps necessary to migrate your xxxxxxxxxxxx Service to a suitable alternative service arrangement prior to the proposed discontinuance date.

Based upon the discontinuance plans of Broadview's underlying service provider, it was anticipated that your xxxxxxxxxxxx Service would have to be discontinued as early as May 22, 2016. It now appears more likely that your existing xxxxxxxxxxxx Service will be discontinued on or after June 6, 2016.

Broadview continues to stand ready to make such adjustments as are necessary to your existing service configuration to ensure that you will not experience loss of your xxxxxxxxxxxxxxxxxxxx Service at the [service address] [City], [State] location. In order to complete the migration to your replacement service, however, Broadview will require access to your premises to install the new service and necessary equipment. This may result in a short service interruption while the services are being migrated but will ultimately preserve for you the benefit of the xxxxxxxxxxxxxxxxxxxx Service which you currently enjoy.

Unless [Customer Name's] xxxxxxxxxxxxxxxxxxxx Service at [service address], [City], [State], is migrated to a new service configuration prior to the date upon which Broadview's underlying service provider decommissions its services at the above Central Offices, Broadview will not be able to prevent the loss of [Customer Name's] xxxxxxxxxxxxxxxxxxxx Service to [service location], [City], [State]. Even though the projected discontinuance date has been extended slightly, it remains imperative that [Customer Name] and Broadview work cooperatively to coordinate the necessary transitioning tasks without delay.

Within the next few days, a Broadview representative will once again contact you to discuss commencing the necessary migration activities. Please feel free to contact Broadview's Customer Care line directly at **1-800-BROADVIEW** if you would like to begin this migration process right away. Broadview's Customer Care representatives are always ready to assist you, should you have any questions or concerns about this or any other matter.

As Broadview has previously advised you, the FCC will normally authorize the proposed discontinuance of service (or reduction or impairment), unless it is shown that a customer is unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity is otherwise adversely affected. If you do wish to object to the discontinuance addressed in this notice, you should file your comments as soon as possible, but no later than 15 days after the Commission releases the 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 and a reference to the §63.71 Application of Broadview Networks, Inc. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Broadview appreciates your assistance and patience through this transition and looks forward to continuing to serve your telecommunications service needs in the future.

Sincerely,

Broadview Networks

**CERTIFICATE OF SERVICE**

I, Catherine M. Hannan, certify that I have, on this 5<sup>th</sup> day of May, 2016, served copies of the foregoing Letter Amendment to Section 63.71 Application of Broadview Networks, Inc., by U.S. Mail, postage prepaid, to the following:

Hon. Sara J. Clark, Secretary  
Massachusetts Department of  
Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

The Honorable Charlie Baker, Governor of Massachusetts  
Office of the Governor  
Room 360  
Boston, MA 02113

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo, Governor of New York State  
Office of the Governor  
NYS State Capitol Building  
Albany, NY 12224

Hon. Barcy McNeal, Secretary  
Public Utilities Commission  
Of Ohio  
180 E. Broad Street  
Columbus, OH 43215-3793

The Honorable John Kasich, Governor of Ohio  
77 South High Street  
30<sup>th</sup> Floor  
Columbus, OH 43215

Hon. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Keystone Building  
Harrisburg, PA 17120

The Honorable Tom Wolf, Governor of Pennsylvania  
Office of the Governor  
225 Main Capitol  
Harrisburg, PA 17120

Secretary of Defense  
Attn: Special Assistant for Telecommunications  
Pentagon  
Washington, D.C. 20301

  
CATHERINE M. HANNAN