



Terri L. Hoskins  
Senior Counsel

06-143

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July 14, 2006

**By Messenger**

RECEIVED

JUL 14 2006

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

Federal Communications Commission  
Office of Secretary

**Re: Amendment to Section 63.71 Application of AT&T Inc.**

Dear Ms. Dortch:

AT&T Inc. files the attached Amendment to its Section 63.71 Application of AT&T Inc. filed with the Commission on June 20, 2006 to provide supplemental information concerning the method used to provide notice to AT&T's wholesale customers.

In addition, AT&T notes that the Certificate of Service submitted with the above referenced filing inadvertently included the public utilities commission of Nevada and the governor of Nevada. The state of Nevada is not impacted by the pending Section 63.71 Application of AT&T and therefore should not have been served with the application. AT&T submits the correct Certificate of Service with this Amendment.

A copy of this letter and Amendment were sent to the public utilities commissions and governors of the states affected by the above referenced application.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Senior Counsel  
AT&T Services, Inc.

Attachment

# **ATTACHMENT A**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Section 63.71 Application of	)	
AT&T Inc. on behalf of	)	File No.
Illinois Bell Telephone Company,	)	
Indiana Bell Telephone Company, Inc.,	)	
Michigan Bell Telephone Company,	)	
The Ohio Bell Telephone Company,	)	
Pacific Bell Telephone Company,	)	
The Southern New England Telephone Company,	)	
Southwestern Bell Telephone, L.P., and	)	
Wisconsin Bell, Inc.	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, As Amended,	)	
To Discontinue the Provision of Service	)	

**AMENDMENT TO SECTION 63.71 APPLICATION OF AT&T INC.**

AT&T Inc., on behalf of its affiliates Illinois Bell Telephone Company, Indiana Bell Telephone Company, Inc., Michigan Bell Telephone Company, The Ohio Bell Telephone Company, Pacific Bell Telephone Company, The Southern New England Telephone Company, Southwestern Bell Telephone, L.P., and Wisconsin Bell, Inc., (collectively referenced herein as "AT&T") files this amendment to the Section 63.71 Application Of AT&T, Inc. filed with the Commission on June 20, 2006 for approval to discontinue Automatic Protection Switching/ Automatic Loop Transfer (APS/ALT) service. AT&T files this amendment to update its statement in the above-referenced application concerning the method AT&T used to send its customers notice of the discontinuance of APS/ALT service. In addition, at the request of Commission staff AT&T also provides more detailed information about the Accessible Letter

process that AT&T used to provide notice to the wholesale customers of the planned discontinuance of APS/ALT service.

In the above-referenced application, AT&T stated that it sent its customers notice of the proposed discontinuance of APS/ALT service using its Accessible Letter process via email. After AT&T filed the above-referenced application, AT&T learned that it could not confirm whether nine of the twenty-three APS/ALT customers were included in the AT&T Accessible Letter database and therefore could have inadvertently been omitted from the distribution of the discontinuance notice. However, out of an abundance of caution, AT&T sent a duplicate notice to these customers by U S Mail on July 13, 2006. A copy of this notice is attached to this Amendment.

As stated above, AT&T sent the majority of the APS/ALT customers notice of the proposed discontinuance of this service via the Accessible Letter process. The Accessible Letter (AL) process is the notification process used by AT&T's wholesale marketing department to communicate official information to its wholesale customers. The AL process is used by AT&T to provide updates on a variety of subjects, including product promotions, deployment of new products, modifications and price changes to existing products, cancellation or retirement of existing products; and operational issues. When wholesale customers sign interconnection agreements with AT&T, the wholesale customer agrees that the AL process will be the primary method used by AT&T to communicate these types of issues. As a result, the wholesale customers expect to receive product discontinuance notices via this process.

AT&T's AL process allows each wholesale customer to designate up to ten (10) contacts to receive Accessible Letters. The wholesale customer uses an online interface to subscribe to Accessible Letter distribution. They enter the names and e-mail addresses into the online tool

and they are incorporated into AT&T's Accessible Letter distribution list on the next business day. When AT&T has information that it wishes to communicate to its wholesale customers, it sends the notification to the individuals designated as AL recipients by each wholesale customer. In addition, Accessible Letters are posted on AT&T's wholesale Internet tool "CLEC Online" and can be accessed by AT&T's wholesale customers at any time.

AT&T has found over its many years of experience that the AL process is the most effective and efficient method of communicating with its wholesale customers.<sup>1</sup>

Respectfully submitted,

AT&T Inc.

By: /s/ Terri L. Hoskins

Terri L. Hoskins  
Gary L. Phillips  
Paul K. Mancini

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Washington, D.C. 20036

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*Its Attorneys*

July 14, 2006

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<sup>1</sup> The AL process was created in 1991 by Southwestern Bell and was adopted by Pacific Bell in 1998, Southern New England Telephone in 1999 and Ameritech in 2000.



Accessible

**AT&T SOUTHWEST REGION 5-STATE- Discontinuance of Automatic Loop Transfer (ALT)**

Date: July 13, 2006

Number: **ACCESS06-048**

Category: Special Access

Issuing ILECS: AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma and AT&T Texas  
(collectively referred to for purposes of this Accessible Letter as "AT&T Southwest  
Region 5-State")

Contact: AT&T Account Manager

Effective August 16 2006, pending Federal Communications Commission (FCC) approval, Automatic Loop Transfer (ALT), [Tariff F.C.C. No. 73, Section 7.3.10 (E)(1)], will no longer be available for new High Capacity Service. Customers with ALT on order or in effect prior to August 16, 2006, will continue to receive ALT until their High Capacity Service Plan expires, or until AT&T Southwest Region 5-State can no longer provide this option. The manufacturer of the equipment used to provide the service has discontinued production of that equipment. Consequently, AT&T Southwest Region 5-State can no longer continue to offer this service to new customers. AT&T Southwest Region 5-State will grandfather the existing serving arrangements and will continue to provide the service to those customers until AT&T Southwest Region 5-State is technically unable to maintain the service, at which time customers may migrate to an alternative service. AT&T Southwest Region 5-State and other carriers already offer diverse routing for that purpose.

The FCC will normally authorize the proposed discontinuance of service (or reduction or impairment) 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 within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Washington, DC 20554, referencing the 63.71 Application of AT&T 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.

AT&T Southwest Region 5-State reserves the right to make any modifications to or to cancel the above information prior to the proposed filing or effective dates. Should any modifications be made to the information, these modifications will be reflected in a subsequent letter sent at the time of the filing. AT&T Southwest Region 5-State will incur no liability to the CLEC if such information, mentioned above, is cancelled by AT&T Southwest Region 5-State or is not ultimately put into effect.



Accessible

**AT&T CALIFORNIA - Discontinuance of Automatic Loop Transfer (ALT)**

Date: July 13, 2006

Number: **ACCESS06-050**

Category: Special Access

Contact: AT&T Account Manager

Effective August 16, 2006, pending Federal Communications Commission (FCC) approval, Automatic Loop Transfer (ALT), [(Tariff F.C.C. No. 1, Section 7.2.9 (D)(1)], will no longer be available for new High Capacity Service. Customers with ALT on order or in effect prior to August 16, 2006, will continue to receive ALT until their High Capacity Service Plan expires, or until AT&T California can no longer provide this option as this equipment is manufacturer discontinued and can no longer provide this option. The manufacturer of the equipment used to provide the service has discontinued production of that equipment. Consequently, AT&T California can no longer continue to offer this service to new customers. AT&T California will grandfather the existing serving arrangements and will continue to provide the service to those customers until AT&T California is technically unable to maintain the service, at which time customers may migrate to an alternative service. AT&T California and other carriers already offer diverse routing for that purpose.

The FCC will normally authorize the proposed discontinuance of service (or reduction or impairment) 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 within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Washington, DC 20554, referencing the 63.71 Application of AT&T 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.

AT&T California reserves the right to make any modifications to or to cancel the above information prior to the proposed filing or effective dates. Should any modifications be made to the information, these modifications will be reflected in a subsequent letter sent at the time of the filing. AT&T California will incur no liability to the CLEC if such information, mentioned above, is cancelled by AT&T California or is not ultimately put into effect.



Accessible

**AT&T MIDWEST REGION 5-STATE - Discontinuance of Automatic Protection Switching (APS)**

Date: July 13, 2006

Number: **ACCESS06-051**

Category: Special Access

Issuing ILECS: AT&T Illinois, AT&T Indiana, AT&T Michigan, AT&T Ohio and AT&T Wisconsin (collectively referred to for purposes of this Accessible Letter as "AT&T Midwest Region 5-State")

Contact: AT&T Account Manager

Effective August 16, 2006, pending Federal Communications Commission (FCC) approval, Automatic Protection Switching (APS), [Tariff F.C.C. No. 2, Section 7.2.9 (B)(3)(d)], will no longer be available for new DS1 Service. Customers with APS on order or in effect prior to August 16, 2006, will continue to receive APS until their DS1 Service expires, or until AT&T Midwest Region 5-State can no longer provide this option. The manufacturer of the equipment used to provide the service has discontinued production of that equipment. Consequently, AT&T Midwest Region 5-State can no longer continue to offer this service to new customers. AT&T Midwest Region 5-State will grandfather the existing serving arrangements and will continue to provide the service to those customers until AT&T Midwest Region 5-State is technically unable to maintain the service at which time customers may migrate to an alternate service. AT&T Midwest Region 5-State and other carriers already offer diverse routing for that purpose.

The FCC will normally authorize the proposed discontinuance of service (or reduction or impairment) 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 within 30 days after receipt of this notification. Address them to the Federal Communications Commission, Washington, DC 20554, referencing the 63.71 Application of AT&T 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.

AT&T Midwest Region 5-State reserves the right to make any modifications to or to cancel the above information prior to the proposed filing or effective dates. Should any modifications be made to the information, these modifications will be reflected in a subsequent letter sent at the time of the filing. AT&T Midwest Region 5-State will incur no liability to the CLEC if such information, mentioned above, is cancelled by AT&T Midwest Region 5-State or is not ultimately put into effect.

**CERTIFICATE OF SERVICE**

I do certify that I have this 14<sup>th</sup> day of July 2006 served a copy of the foregoing Amendment to Section 63.71 Application of AT&T Inc. was sent by U.S. Mail postage prepaid to the following:

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

Michael R. Peevey  
President, California Public Utilities  
Commission  
Headquarters Office  
505 Van Ness Avenue  
San Francisco, CA 94102

Governor Arnold Schwarzenegger  
State Capitol Building  
Sacramento, CA 95814  
Phone: 916-445-2841  
Fax: 916-445-4633

Governor James Doyle  
115 East State Capitol  
Madison, Wisconsin 53702

Governor Jennifer M. Granholm  
P.O. Box 30013  
Lansing, Michigan 48909

Governor M. Jodi Rell  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, Connecticut 06106

Governor Rod R. Blagojevich  
Office of the Governor  
207 State House  
Springfield, Illinois 62706

Governor Mitch Daniels  
Office of the Governor  
Statehouse  
Indianapolis, Indiana 46204

Governor Bob Taft  
30<sup>th</sup> Floor  
77 South High Street  
Columbus, Ohio 43215-6117

Connecticut Department of Public Utilities  
Control  
Ten Franklin Square  
New Britain, CT 06051

Illinois Commerce Commission  
527 East Capitol Ave  
Springfield, IL 62701

Indiana Utility Regulatory Commission  
Indiana Government Center South  
302 West Washington St.  
Suite E-306  
Indianapolis, IN 46204

Michigan Public Service Commission  
P.O. Box 30221  
Lansing, MI 48909

Governor Mike Huckabee  
Governor's Office  
State Capitol Rm 250  
Little Rock, Arkansas 72201

Governor Matt Blunt  
Office of the Governor  
Room 216, State Capitol Building  
Jefferson City, Missouri 65101

Governor Kathleen Sebelius  
Office of the Governor  
Capitol, 300 SW 10th Ave., Ste. 212S  
Topeka, Kansas 66612-1590

Governor Brad Henry  
State Capitol Building  
2300 N. Lincoln Blvd., Room 212  
Oklahoma City, Oklahoma 73105

Public Service Commission of Wisconsin  
610 North Whitney Way  
P.O. Box 7854  
Madison, Wisconsin 53707-7854

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

Governor Rick Perry  
Office of the Governor  
P.O. Box 12428  
Austin, Texas 78711-2428

Arkansas Public Utilities Commission  
1000 Center Street  
Little Rock, Arkansas 72201

Missouri Public Service Commission  
Public Information Office  
Governor Office Building  
200 Madison Street  
PO Box 360  
Jefferson City, MO 65102-0360

Oklahoma Corporation Commission  
P.O. Box 52000  
Oklahoma City, OK 73152-2000

Public Utilities Commission of Texas  
1701 N. Congress Avenue  
PO Box 13326  
Austin, TX 78711-3326

Kansas Corporation Commission  
Commissioners, Utilities Division,  
Motor Carriers, Pipeline Safety and Energy  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

/s/ Otis T. Robinson  
Otis T. Robinson

ATTACHMENT