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September 11, 2009

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, D.C. 20554

Re: *Section 63.71 Application of AT&T Corp. for Authority Pursuant to Section 63.71 of the Commission's Rules, 47 C.F.R. § 63.71, to Discontinue the Provision of Service, WC Docket No. 09-141, Comp. Pol. File No. 914*

Dear Ms. Dortch:

In response to the Commission's public notice seeking comment on the above-referenced petition by AT&T to discontinue our CallVantage interconnected VoIP service, AT&T understands that only one party filed comments.¹ Specifically, William M. Creighton explained that he is an AT&T retiree who is eligible to receive a discount on certain telephony services offered by AT&T, including CallVantage.² He further explained that he did not want CallVantage service to be discontinued because he would not be eligible to receive a retiree discount on other services offered by alternate providers.

On August 31, 2009, an AT&T representative contacted Mr. Creighton to address his concerns. Notwithstanding the availability of voice services from alternate providers, Mr. Creighton indicated that he was only interested in AT&T services that would qualify for a retiree discount. The AT&T representative explained that, in the area where Mr. Creighton resides, AT&T does not offer other services eligible for such a discount and Mr. Creighton would not be eligible to receive a retiree discount on services offered by an alternate provider. Mr. Creighton acknowledged his understanding of AT&T's position on this matter, but indicated that he stood by the position stated in his comments to the Commission.

As explained in AT&T's discontinuance application, CallVantage customers can choose from a variety of wireline, wireless and/or VoIP service options from alternate providers in order to replace their CallVantage service. While AT&T regrets that Mr. Creighton will not be able to continue to obtain the retiree discount he previously received, Commission rules do not obligate AT&T to make such a discount available to Mr. Creighton upon the discontinuance of CallVantage service, notwithstanding his suggestions to the contrary.³ Accordingly, AT&T

¹ *Comments Invited on Application of AT&T Corp. to Discontinue Interconnected VoIP Services*, WC Docket No. 09-141, Public Notice, DA 09-1813 (Aug. 14, 2009).

² Letter from William M. Creighton to FCC (dated Aug. 3, 2009) (Creighton Letter).

³ Creighton Letter at 1.

requests that the Commission permit AT&T's discontinuance application to become deemed granted consistent with Commission rules.⁴

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/
Jack Zinman

CC: Rodney McDonald

⁴ See 47 C.F.R. § 63.71(c).