

WC 09-235

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
)  
Section 63.71 Application of )  
BellSouth Long Distance, Inc. d/b/a AT&T )  
Long Distance )  
)  
For Authority Pursuant to Section 214 of )  
The Communications Act of 1934, As Amended, )  
To Discontinue the Provision of Service )

FILED/ACCEPTED  
File No.  
DEC 17 2009  
Federal Communications Commission  
Office of the Secretary

**SECTION 63.71 APPLICATION OF BELLSOUTH LONG DISTANCE, INC. d/b/a  
AT&T LONG DISTANCE**

BellSouth Long Distance, Inc., d/b/a AT&T Long Distance Service ("AT&T LD"), applies 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 BellSouth Long Distance Frame Relay and Asynchronous Transfer Mode (ATM) Services.

As required by Section 63.71(a) and (b) of the Commission's rules, AT&T LD provides the following information:

**Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):**

BellSouth Long Distance, Inc. d/b/a AT&T Long Distance  
2180 Lake Blvd.  
Suite 500  
Atlanta, GA 30319

**Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):**

AT&T LD will no longer offer these services on or after January 27, 2010, subject to Commission authorization of the discontinuance pursuant to 47 C.F.R. § 63.71(c).

**Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):**

AT&T LD will discontinue these services throughout the continental United States, Alaska, Hawaii, Puerto Rico and the U.S. Virgin Islands.

**Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):**

BellSouth Long Distance Frame Relay service is an end-to-end data network offering based on frame relay or packet switched technology and provides fast, efficient and reliable data connectivity between two to many locations.

BellSouth Long Distance Asynchronous Transfer Mode (ATM) Service is an end-to-end data network offering based on cell relay technology and provides high speed, efficient and reliable data transfer between two to many locations.

As a result of the acquisition of BellSouth Corporation and its affiliated companies by AT&T Inc., the combined entity is streamlining its service portfolio. If this Application is approved, the services described above, currently provided by AT&T LD will be provided by another affiliate of AT&T.

The public convenience and necessity will not be impaired by this service discontinuance because there are many alternative providers of these services, including but not limited to AT&T Corp., an affiliate of AT&T LD.

**Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):**

AT&T LD notified customers by letter sent via U.S. Mail on December 17<sup>th</sup>. A copy of the letter is attached hereto as Attachment A.

Copies of this Application are being sent, first class U.S. Mail, to the public utilities commissions and governors of the affected states and territories and also to the

Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.

**Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):**

AT&T LD is considered non-dominant with respect to the services to be discontinued.

Questions about this application may be addressed to Toni Acton, AT&T Services, Inc., Director -- Federal Regulatory, 1120 20<sup>th</sup> Street, NW, Suite 1000, Washington, DC 20036, (202) 457-3039.

**Conclusion:**

The public convenience and necessity will not be adversely affected by the discontinuance of these services since there are alternative providers of these services. AT&T LD respectfully requests that the Commission approve its Section 63.71 Application to discontinue BellSouth Long Distance Frame Relay and ATM services.

Respectfully submitted,

By: s/ Terri L. Hoskins

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

AT&T Inc.  
1120 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20036

(202) 457-3047 – Tel. No.  
(202) 457-3073 – Fax. No.

*Its Attorneys*

December 17, 2009



AT&T Long Distance  
Service  
2180 Lake Blvd.  
Suite 500  
Atlanta, GA 30319

December 17, 2009

CUSTOMER NAME  
ADDRESS  
CITY, STATE ZIP

[customer name]

AT&T values your business, and we would like to update you on some important changes underway. Currently, your BellSouth Long Distance Frame Relay and Asynchronous Transfer Mode (ATM) Services are provided to you utilizing an arrangement with a third party provider. This arrangement will end in 2012, and we wish to provide notice of our transition plans. This will provide time for you to review the options that are available, so that the transition to another AT&T service can be accomplished in an orderly manner.

The first step in this process is a change in our policy for contract renewals. Effective on or about January 27, 2010, pending regulatory approval, the following AT&T services will no longer be available to new customers (no current contract or service) in the continental United States, Alaska, Hawaii, Puerto Rico and the U.S. Virgin Islands:

BellSouth<sup>1</sup> Long Distance Frame Relay Service (interstate and intrastate service)  
BellSouth<sup>1</sup> Long Distance Asynchronous Transfer Mode (ATM) Service

As a current AT&T customer with BellSouth Long Distance Frame Relay or ATM Service, you may retain your existing service(s) and continue to conduct moves, additions and administrative changes as needed, subject to the terms of your existing BellSouth<sup>®</sup> Business Class Family of Services Agreement or Customized Pricing Arrangement (collectively the "Agreement").

Contract Extensions may be signed until June 30, 2011:

For customers with BellSouth Long Distance Frame Relay or ATM Services, AT&T will allow one extension of your existing contract past its current term for 12 months, provided the 12 month extension is signed on or before June 30, 2011.

If you do not select a new service plan prior to the end of your current or extended contract term, your service will be governed by the terms of the BellSouth Long Distance, Inc. d/b/a AT&T Long Distance, Service Guide. Upon expiration of your contract, we will continue to provide the service on a month-to-month basis until June 30, 2012. During that interval, you or AT&T can choose to discontinue this service by sending written notice at least thirty (30) days prior to the expiration of the current or extended term. This is consistent with our Service Guide, which can be found at [www.att.com/servicepublications](http://www.att.com/servicepublications).

Though we plan to withdraw the BellSouth Long Distance Frame relay and ATM service offering on June 30, 2012, AT&T is ready to provide AT&T VPN Services as a replacement solution today. AT&T VPN is our premier network-based Multi-protocol Label Switching (MPLS) service delivered via the world-class AT&T Global Network, with nearly \$1 Billion invested to expand our network reach, enhance performance and deliver new service capabilities.

With AT&T VPN, you will benefit from:

- Access to our reliable worldwide network, backed by service level agreements (SLAs) for on-time provisioning, site availability and performance (latency, data delivery, and jitter).

(Continued)

- Service capabilities, including native mode Multicast support, MultiLink PPP, multiple Class of Service (CoS) options, robust Security Services, to mention a few.
- Extensive Support from dedicated customer care and technical marketing teams, including access to a powerful suite of online monitoring and management tools via our BusinessDirect<sup>3</sup> portal.

To ensure a smooth transition, AT&T will waive any applicable early contract termination fees on the legacy BellSouth Long Distance Frame Relay or ATM Service.

Your business is important to us. We want to ensure that you are obtaining the most suitable services for your needs. Please contact your Account Manager or other members of your Sales Team if you have any questions. If you do not know your Account Manager please refer to the customer service number on your invoice.

Thank you for choosing AT&T.

Sincerely,

Your AT&T Business Specialist

**AT&T is required by the FCC to provide the following statement:**

The FCC will normally authorize this 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 as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. 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 section 63.71 Application of BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service. Comments should include specific information about the impact of this proposed discontinuation (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

CERTIFICATE OF SERVICE

I do certify that I have, this 17th day of December 2009 served a copy of the foregoing Section 63.71 Application via U.S. Mail postage prepaid to the parties listed on the attached sheets.

/s/Lacretia Hill  
Lacretia Hill

**Alabama Public Service Commission  
100 N. Union Street  
Suite 850  
Montgomery, AL 36130**

**Governor Bob Riley  
State Capitol  
600 Dexter Avenue  
Montgomery, AL 36130**

**Arizona Corporation Commission  
Commissioners Wing  
1200 West Washington  
Phoenix, AZ 85007-2996**

**The Honorable Jan Brewer  
Governor of Arizona  
1700 West Washington  
Phoenix, Arizona 85007**

**Arkansas Public Service Commission  
1000 Center Street  
Little Rock, AR 72201**

**Governor Mike Beebe  
Governor's Office  
State Capitol Rm. 250  
Little Rock, AR 72201**

**Governor Arnold Schwarzenegger  
Governor's Office  
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Sacramento, California 958 14**

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San Francisco, CA 94 102**

**Colorado Public Utilities Commission  
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Denver, CO 80202**

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136 State Capitol  
Denver, CO 80203-1792**

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Hartford, Connecticut 06 106**

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Ten Franklin Square  
New Britain, CT 0605 1**

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861 Silver Lake Boulevard  
Cannon Building, Suite 1000  
Dover, DE 19904**

**Governor Jack Markell  
Tatnall Building  
William Penn Street, 2<sup>nd</sup> Floor  
Dover, DE 19901**

**District of Columbia  
Public Service Commission  
1333 H Street, NW  
Suite 200, West Tower;  
Washington, DC 20005**

**Mayor Adrian Fenty  
Office of the Mayor  
John A. Wilson Building  
1350 Pennsylvania Avenue, NW  
Washington, DC 20004**

**Florida Public Service Commission  
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**Governor Charlie Crist  
Office of the Governor  
The Capitol  
Tallahassee, FL 32399-0001**

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Georgia State Capitol  
Atlanta, GA 30334**

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**Idaho Public Utilities Commission  
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Boise, ID 83720-0074**

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207 State House  
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1007 East Grand Ave.  
Des Moines, IA 50319**

**Iowa Utilities Board  
350 Maple Street  
Des Moines, IA 50319**

**Governor Mark Parkinson  
Office of the Governor  
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**Kansas Corporation Commission  
Commissioners, Utilities Division, Motor  
Carriers, Pipeline Safety and Energy  
1500 SW Arrowhead Road  
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**New York State Public Service Commission  
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**North Carolina Utilities Commission  
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**Governor Brad Henry  
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**Secretary of Defense  
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