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April 18, 2013

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

Re: Section 63.71 Application of Verizon Select Services Inc. - Proposed Grandfathering of Outbound Long Distance Service, WC Docket No. 13-80; Comp. Pol. No. 1089

Dear Ms. Dortch:

Verizon Select Services Inc. (“VSSI”) filed an application pursuant to section 214(a) of the Communication Act and Section 63.71 of the Commission’s rules to discontinue provisioning of its outbound long distance service offerings (“VSSI long distance”), following expiration of existing customers’ contracts. During the period for public comment, only one party, the City of New York, via its Department of Information Technology and Telecommunications (“DOITT”), filed substantive comments. We have discussed the matter with DOITT and fully addressed each of the concerns that DOITT raised with respect to the discontinuance of this service.

As VSSI explained both in its application and in its notifications to its customers, on or after April 22, 2013, VSSI plans to no longer accept new customers for VSSI long distance. However, existing customers, including the City of New York, may retain their VSSI long distance services in accordance with their contracts’ terms and conditions and VSSI will continue to fill orders for moves, adds, or changes for such customers. VSSI will work with its customers to transition them to alternative services and, eventually, VSSI will discontinue these services completely.

DOITT filed comments in this proceeding asserting that it was not provided with appropriate notice and explaining that it might face difficulty in transitioning to alternative providers because it requires more than a year to complete the City’s competitive procurement process. VSSI is committed to working cooperatively with the City to address its concerns. First, the City’s contract remains in effect until it expires in December 2015. Pursuant to that contract, the City may continue to make use of the VSSI long distance services until that time, as well as to process moves, changes, or adds pursuant to its terms. The City therefore has more than two years in which to discuss the move to alternative services or transition to an alternative provider, as well as to complete any necessary competitive procurement process. Second, VSSI has continued an open discussion with the City about its plans and provided appropriate notice thereof. As early as November 2012, VSSI representatives communicated with the DOITT representatives about its planned grandfathering and eventual discontinuance of VSSI long distance. In February, VSSI sent notification letters in the form attached to its application to the contacts for every

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unique account address linked to a City account, including to DOITT. DOITT representatives advised VSSI personnel by email approximately a week later that they had received the notifications. Additionally, VSSI representatives are in regular formal and informal communications with the City and DOITT, including on a standing weekly call to discuss any open issues.

Following the City's comments in this proceeding, VSSI again reached out to the City to discuss the proposed grandfathering of VSSI long distance service. We reiterated that the City's VSSI long distance service will continue pursuant to its existing contract until that contract expires. We also discussed efforts to continue an open discourse to meet the City's needs. This fully addresses the issues raised in the City's comments concerning the discontinuance of VSSI long distance.

Please call me at 202 515-2590 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Marlene", with a long horizontal flourish extending to the right.

cc: Carmel Weathers