

**ORIGINAL**

**Frederick Moacdieh**  
Executive Director - Federal Regulatory Affairs

1300 I Street, NW  
Suite 400 West  
Washington, DC 20005

(202) 515-2590  
(202) 336-7922 (fax)

August 1, 2014

**ACCEPTED/FILED****AUG - 1 2014**

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

Federal Communications Commission  
Office of the Secretary

**RE: Section 63.71 Application of Verizon New England Inc., Verizon New York Inc., Verizon Pennsylvania LLC, Verizon Virginia LLC, Verizon Washington, DC Inc., Verizon Maryland LLC, Verizon North LLC, Verizon California Inc., and GTE Southwest Incorporated (d/b/a Verizon Southwest)**

Dear Ms. Dortch:

The Verizon Companies captioned above, hereby submit the enclosed Application under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to grandfather and eventually discontinue Metallic Service and Program Audio Service for approximately 125 additional customers who did not receive the customer notification associated with the Application that Verizon filed on September 16, 2013 to discontinue these same services. The September 16, 2013 Application was automatically granted via the Commission's streamlined process on January 6, 2014.

Verizon notified these additional customers on July 31, 2014 of the proposed discontinuance. Copies of the written notifications are attached.

Verizon is filing the original and five copies of this letter (along with the attached Application) with the Office of the Secretary.

If you have any questions regarding this matter, please contact me at 202-515-2590.

Attachment

cc: Secretary of Defense, Attn: Special Assistant for Telecommunications  
Public Utilities Commission for Each Affected State  
Governor of Each Affected State

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**ACCEPTED/FILED**

**AUG - 1 2014**

**Federal Communications Commission  
Office of the Secretary**

In the Matter of )  
)  
Section 63.71 Application of )  
Verizon New England Inc., Verizon New )  
York Inc., Verizon Pennsylvania LLC, )  
Verizon Virginia LLC, Verizon )  
Washington, DC Inc., Verizon Maryland ) File No. \_\_\_\_\_  
LLC, Verizon North LLC, Verizon )  
California Inc., and GTE Southwest )  
Incorporated (d/b/a Verizon Southwest) )  
)  
)  
For Authority Pursuant to Section 214 of )  
the Communications Act of 1934, As )  
Amended To Discontinue the Provision of )  
Service )  
)  
)  
)

**SECTION 63.71 APPLICATION OF  
VERIZON INCUMBENT LOCAL EXCHANGE COMPANIES**

The Verizon incumbent local exchange companies captioned above (“Verizon”) submit this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission’s rules to grandfather and eventually discontinue Metallic Service and Program Audio Service for approximately 125 additional customers who did not receive the customer notification associated with the application that Verizon filed on September 16, 2013, to discontinue these same services.<sup>1</sup>

<sup>1</sup> See, WC Docket No. 13-260, Section 63.71 Application of GTE Southwest Incorporated d/b/a Verizon Southwest *et al*, (Filed Sept. 16, 2013) (“September Application”). Verizon New York Inc. and Verizon New Jersey Inc. had previously received permission to discontinue these services in areas of Lower Manhattan and in portions of New Jersey where Superstorm Sandy destroyed copper facilities. *Section 63.71 Application of Verizon New Jersey Inc. and Verizon New York Inc. for Authority to Discontinue Domestic*

That Application was automatically granted via the Commission's streamlined process on January 6, 2014. Subsequently, Verizon learned that these approximately 125 customers ("Customers") of those services did not receive the customer notices that were mailed on or before September 12, 2013, in connection with the September Application.

Verizon on July 31, 2014 notified these Customers of the proposed discontinuance. Copies of the notices are attached to this Application as Exhibit A. The July 31, 2014 notices explain that subject to the terms and conditions of applicable tariffs and contracts, Verizon will cease accepting move, add, or change orders from these Customers for these services as of October 31, 2014. The July 31, 2014 notices also explain that Verizon, subject to the terms and conditions of applicable tariffs and contracts, plans on or after December 31, 2014 to discontinue Metallic Service and Program Audio Service.

As Sections 63.71(a) and (b) of the Commission's rules require, Verizon provides the following information:

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

Verizon Pennsylvania LLC  
1717 Arch Street  
Philadelphia, PA 19103

Verizon Washington, DC Inc.  
1300 I Street, N.W.  
Suite 400 West  
Washington, DC 20005

Verizon Maryland LLC  
1 East Pratt Street  
Baltimore, MD 21202

Verizon Virginia LLC  
22001 Loudoun County Parkway  
Ashburn, VA 20147

---

*Telecommunications Services, Order, 28 FCC Rcd 13826 (2013) ("New York/New Jersey Order").*

Verizon New York Inc.  
140 West Street  
New York, NY 10007

Verizon New England Inc.  
125 High Street - Oliver Tower 7th Floor  
Boston, MA 02110

Verizon North LLC  
1717 Arch Street  
Philadelphia, PA 19103

Verizon California Inc.  
2535 W. Hillcrest Drive, CAM21LB  
Newbury Park, CA 91320

GTE Southwest Incorporated (d/b/a Verizon Southwest)  
600 Hidden Ridge  
Irving, TX 75038

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

Subject to the Commission's authorization, and consistent with its earlier approved discontinuance, on or after October 31, 2014, subject to the terms and conditions of applicable tariffs and contracts, Verizon will stop accepting orders for moves, adds, or changes from these Customers for Metallic Service and Program Audio Service. Those Customers that are subscribed to Metallic Service or Program Audio Service when the grandfathering takes effect will be able to keep their service until they choose to cancel it or until Verizon terminates the service. Subject to the terms and conditions of applicable tariffs and contracts, Verizon intends to terminate these services on or after December 31, 2014.

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

Except with respect to the Customers, Verizon has already grandfathered or terminated these services throughout its service territory in accordance with the September Application and the *New York/New Jersey Order*. Subject to the Commission's authorization, Verizon will

grandfather and eventually discontinue these services to the Customers, who are in the following states:

*Metallic Service*: Virginia and the District of Columbia.

*Program Audio Service*: Connecticut, New York, Massachusetts, Rhode Island, Maryland, Pennsylvania, Virginia, California, and Texas.

**4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):<sup>2</sup>**

*Metallic Service* uses a metallic channel to transmit signals at low speeds up to 30 baud. Metallic channels are provided between customer-designated premises or between a customer location and a Verizon hub. Metallic Service is described in Verizon's FCC Tariff No. 1, Section 7.2.1.

*Program Audio Service* provides an analog channel for the transmission of a complex signal voltage. Customers have the option to choose the bandwidth tier (50 to 15000 Hz; 200 to 3500 Hz; 100 to 5000 Hz; or 50 to 8000 Hz) to meet their needs. This service provides only one-way transmission. Program audio channels are provided between customer-designated locations or between a customer location and a Verizon hub. It is described in Verizon's FCC Tariff No. 1, Section 7.2.4, Verizon's FCC Tariff No. 11, Section 7.2.4, and Verizon's FCC Tariff No. 14, Section 5.2.3.

As previously explained, Verizon is discontinuing these services because they are obsolete and have been supplanted by newer technologies and services. Customers can choose from many alternative services, including Private IP service, Ethernet services, and private-line services that other providers currently offer, including carriers affiliated with Verizon.

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<sup>2</sup> The September Application also covered Telegraph Grade service. Because none of the Customers receive Telegraph Grade service, Telegraph Grade service is not included in this application, and the automatically granted authority to discontinue Telegraph Grade service that Verizon received in January 2014 is unaffected by this application.

Consequently, the public convenience and necessity will not be impaired by this discontinuance.

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

Verizon sent notices to the Customers by U.S. Mail on or before July 31, 2014. Copies of the notices are attached as Exhibit A.

Verizon is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

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

Verizon is considered dominant with respect to the services to be discontinued.

**CONCLUSION**

Verizon respectfully requests that the Commission approve this Application.

Michael E. Glover  
*Of Counsel*

Respectfully submitted,

/s/ Curtis L. Groves  
William H. Johnson  
Curtis L. Groves  
Verizon  
1320 N. Courthouse Rd.  
9<sup>th</sup> Floor  
Arlington, VA 22201  
(703) 351-3084 (Office)  
(703)-351-3656 (Facsimile)

August 1, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of August, 2014, I served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

/s/ Curtis L. Groves  
Curtis L. Groves

## SERVICE LIST

### CALIFORNIA

Michael R. Peevey  
President  
Public Utilities Commission  
505 Van Ness Avenue  
Room 5218  
San Francisco, CA 94102

The Honorable Edmund G. Brown Jr.  
Office of the Governor  
State Capitol Building  
Sacramento, CA 95814

### CONNECTICUT

Arthur H. House  
Chairman  
Public Utility Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

The Honorable Dannel P. Malloy  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, CT 06106

### DISTRICT OF COLUMBIA

Betty Ann Kane  
Chairman  
District of Columbia Public Service  
Commission  
1333 H Street, NW  
Suite 200, West Tower  
Washington, DC 20005

The Honorable Vincent C. Gray  
Office of the Mayor  
John A. Wilson Building  
1350 Pennsylvania Avenue, NW  
Washington, DC 20004

### MARYLAND

W. Kevin Hughes  
Chairman  
Maryland Public Service Commission  
6 St. Paul Street  
16<sup>th</sup> Floor  
Baltimore, MD 21202-6806

The Honorable Martin O'Malley  
Office of the Governor  
State House  
100 State Circle  
Annapolis, MD 21401-1925

### MASSACHUSETTS

Karen Charles Peterson, Commissioner  
1000 Washington Street  
Suite 820  
Boston, MA 02118

The Honorable Deval Patrick  
Office of the Governor  
Room 105  
Boston, MA 02133

**NEW YORK**

Audrey Zibelman  
Chair  
Public Service Commission  
3 Empire State Plaza  
Albany, NY 12223-1350

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

**PENNSYLVANIA**

Robert F. Powelson  
Chairman  
Pennsylvania Public Utility  
Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

The Honorable Tom Corbett  
Office of the Governor  
Main Capitol Building, Room 225  
Harrisburg, PA 17120

**RHODE ISLAND**

Margaret E. Curran  
Chairperson  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

The Honorable Lincoln D. Chafee  
Office of the Governor  
82 Smith Street  
Providence, RI 02903-1196

**TEXAS**

Donna L. Nelson  
Chairman  
Public Utilities Commission of Texas  
1701 North Congress Avenue  
P.O. Box 13326  
Austin, TX 78711

The Honorable Rick Perry  
Office of the Governor  
P.O. Box 12428  
Austin, TX 78711

**VIRGINIA**

Judith W. Jagdmann  
Chairman  
State Corporation Commission  
Division of Communications  
P.O. Box 1197  
Richmond, VA 23218

The Honorable Terry McAuliffe  
Office of the Governor  
P.O. Box 1475  
Richmond, VA 23218

**Secretary of Defense  
Attn: Special Asst. for  
Telecommunications  
Pentagon  
Washington, DC 20301**

**EXHIBIT A**

July 31, 2014

**Verizon**

22001 Loudoun County Parkway  
Room G2-2-543  
Ashburn, VA 20147 USA

RE: Account #

Dear Valued Customer,

Verizon's ability to stay at the forefront of technology evolution allows us to help government agencies remain efficient, responsive and secure. To consistently help you succeed in an ever-changing and increasingly globalized environment, we continue to focus on the technologies that are influencing the way organizations operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

Subject to FCC approval and applicable tariff and contractual obligations, the following interstate services will be grandfathered in the applicable Verizon FCC tariffs and then later discontinued: Metallic and Program Audio (individually and collectively referred to as the "Grandfathered Service(s)").

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. FCC No. 1, Section 7.2.1 –VA, DC.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. FCC No. 1, Section 7.2.4 – PA, MD, VA; FCC No. 11, Section 7.2.4 – CT, NY, MA, RI; and FCC No. 14, Section 5.2.3 - CA, PA, TX.

This initiative will allow us to serve you better – ensuring you can seize the advantages of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

On or after October 31, 2014, subject to approval from the FCC (the "Effective Date"), Verizon will stop accepting new orders for Grandfathered Services (including requests for moves, adds, or any other changes to existing services). Existing customers of Grandfathered Services may continue to receive existing Grandfathered Services, subject to the terms set forth below.

- On or after December 31, 2014, Verizon plans to discontinue the Grandfathered Services. Verizon will provide customers who purchase Grandfathered Services on a month-to-month or a daily basis advance written notice before discontinuing a Grandfathered Service.
- If you are subscribed by contract to a Grandfathered Service on the Effective Date, Verizon will continue to provide you with the Grandfathered Service until either you cancel the Grandfathered Service or Verizon terminates the Grandfathered Service in accordance with applicable contractual obligations.
- You may cancel your Grandfathered Services at any time.

Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Grandfathered Services offered by Verizon. The alternative services include the following:

- *Private IP (PIP) Service.* PIP service is a network-based virtual private network (VPN) enabling customers to communicate effectively over a secure network. It also provides a foundation for automating business processes between companies, including e-commerce, shared intranets, and extranets.
- *Ethernet Services.* Several Ethernet alternatives are available with local, national and international capability, including the following:
  - Ethernet Virtual Private Line (EVPL) – Converged Packet Architecture (CPA). This EVPL service is a point-to-point Ethernet service. Converged Packet Architecture (CPA) is a Multi-Protocol Label Switching (MPLS)-based network that allows configuration of point-to-point, point-to-multipoint, or partial mesh designs to meet evolving data transport needs.
  - Ethernet Virtual Private Line (EVPL) – Switched Ethernet Service (SES). This EVPL service is a point-to-point Ethernet service. Switched Ethernet Service (SES) is a fiber-based, metropolitan area Ethernet service that connects customer locations together using Ethernet interfaces of 10, 100, 1,000 or 10,000 Mbps.
  - Ethernet Private Line (EPL) Service. EPL service uses Ethernet over SONET to provide dedicated point-to-point Ethernet connectivity between two locations. EPL circuits provide solutions for customers who require high-speed, low latency and secure Ethernet wide area network (WAN) connectivity.

It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

Verizon Enterprise Solutions

*FCC Required Notice: 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 30 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 § 63.71 Application of Verizon New England Inc.; Verizon New York Inc.; Verizon Pennsylvania LLC; Verizon Virginia LLC; Verizon Washington, DC Inc.; Verizon Maryland LLC; Verizon North LLC; Verizon California Inc.; and GTE Southwest Incorporated (d/b/a Verizon Southwest). 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.*

Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

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

**Verizon Operating Companies - Name and Address**

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2535 W. Hillcrest Drive, CAM21LB  
Newbury Park, CA 91320

Verizon Maryland LLC  
1 East Pratt Street  
Baltimore, MD 21202

Verizon New England Inc.  
125 High Street - Oliver Tower 7th Floor  
Boston, MA 02110

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140 West Street  
New York, NY 10007

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1717 Arch Street  
Philadelphia, PA 19103

Verizon Pennsylvania LLC  
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Philadelphia, PA 19103

GTE Southwest Incorporated (d/b/a Verizon Southwest)  
600 Hidden Ridge  
Irving, TX 75038

Verizon Virginia LLC  
22001 Loudoun County Parkway  
Ashburn, VA 20147

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July 31, 2014

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As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

Subject to FCC approval and applicable tariff and contractual obligations, the following interstate services will be grandfathered in the applicable Verizon FCC tariffs and then later discontinued: Metallic and Program Audio (individually and collectively referred to as the "Grandfathered Service(s)").

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This initiative will allow us to serve you better – ensuring you can seize the advantages of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

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It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

Verizon Enterprise Solutions

*FCC Required Notice: 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 30 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 § 63.71 Application of Verizon New England Inc.; Verizon New York Inc.; Verizon Pennsylvania LLC; Verizon Virginia LLC; Verizon Washington, DC Inc.; Verizon Maryland LLC; Verizon North LLC; Verizon California Inc.; and GTE Southwest Incorporated (d/b/a Verizon Southwest). 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.*

Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

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Baltimore, MD 21202

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600 Hidden Ridge  
Irving, TX 75038

Verizon Virginia LLC  
22001 Loudoun County Parkway  
Ashburn, VA 20147

Verizon Washington, DC Inc.  
1300 I Street, N.W., Suite 400 West  
Washington, DC 20005



Global Wholesale  
600 Hidden Ridge  
HQEWMNOTICES  
P.O. Box 152092  
Irving, TX 75038  
wmnotices@verizon.com

July 31, 2014

<Customer Name>  
<Address Line 1>  
<Address Line 2>  
<City>, <ST> <ZIP>

RE: Notice of Grandfathering and Discontinuance of Certain Verizon Interstate  
Metallic and Program Audio Services

Dear Valued Customer,

As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

Subject to FCC approval and applicable tariff and contractual obligations, the following Interstate services will be grandfathered in the applicable Verizon FCC tariffs and then later discontinued: Metallic and Program Audio (individually and collectively referred to as the "Grandfathered Service(s)").

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. FCC No. 1, Section 7.2.1 –VA, DC.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. FCC No. 1, Section 7.2.4 – PA, MD, VA; FCC No. 11, Section 7.2.4 – CT, NY, MA, RI; and FCC No. 14, Section 5.2.3 - CA, PA, TX.

**Grandfathering and Discontinuance of Certain Verizon Interstate Metallic and Program Audio Services**

July 31, 2014

Page 2

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- On or after December 31, 2014, Verizon plans to discontinue the Grandfathered Services. Verizon will provide customers who purchase Grandfathered Services on a month-to-month or a daily basis advance written notice before discontinuing a Grandfathered Service.
- If you are subscribed to a Grandfathered Service on the Effective Date, Verizon will continue to provide you with the Grandfathered Service until either you cancel the Grandfathered Service or Verizon terminates the Grandfathered Service.
- You may cancel your Grandfathered Services at any time.

If you wish to make arrangements for alternative service or have questions about this letter, please contact your Verizon account team representative.

Sincerely,

Verizon Global Wholesale

*FCC Required Notice: 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 30 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 § 63.71 Application of Verizon New England Inc.; Verizon New York Inc.; Verizon Pennsylvania LLC; Verizon Virginia LLC; Verizon Washington, DC Inc.; Verizon Maryland LLC; Verizon North LLC; Verizon California Inc.; and GTE Southwest Incorporated d/b/a Verizon Southwest. 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.*

Exhibit A

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Newbury Park, CA 91320

Verizon Maryland LLC  
1 East Pratt Street  
Baltimore, MD 21202

Verizon New England Inc.  
125 High Street - Oliver Tower 7th Floor  
Boston, MA 02110

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140 West Street  
New York, NY 10007

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22001 Loudoun County Parkway  
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Washington, DC 20005