FILED JUL 25, 2014 DOCUMENT NO. 03969-14 FPSC - COMMISSION CLERK

ECEIVED-FPS;

9



W. Richard Morris

Director/Sr. Counsel - Government Affairs rich.r.morris@sprint.com

Sprint Nextel KSOPHN0314-3A671 6450 Sprint Parkway Overland Park, KS 66251

July 21, 2014

Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

# Re: Service copy of Sprint's Section 63.71 filing at the Federal Communications

Dear Commission,

Sprint has filed a Section 63.71 Application with the Federal Communications Commission ("FCC") seeking to discontinue the provision of Sprint Integrated Local Service. The FCC rules require that a copy of the filing be served upon the governor and the public utility commission of each jurisdiction covered by Sprint's Section 63.71 application. Attached please find a copy of Sprint's application to the FCC.

If your rules require Sprint to seek state approval of the discontinuance of Sprint Integrated Services, Sprint will also serve, under separate cover, its state application for approval to discontinue this service.

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

Sincerely,

W. Richad Mornis

W. Richard Morris

attachment

## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.

In the Matter of	)	
	)	WC Docket No. 14-
Section 63.71 Application of	)	
Sprint Communications Company L.P.	)	

## **SECTION 63.71 APPLICATION**

Sprint Communications Company L.P. ("Sprint" or "Applicant") hereby seeks authorization, pursuant to Section 214(a) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214(a), and Section 63.71 of the rules of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 63.71, to discontinue its provision of Sprint Integrated Local Services to a limited number of customers. The services to be discontinued primarily consist of resold local voice services, tariffed in several states, which are sold in a bundle with related interexchange services and features that is marketed as Sprint Complete Access. The specific Sprint Integrated Local Services and associated features being discontinued are unlimited business Local Exchange Service, Touch Tone Calling Service, Integrated T1 Service, Digital Integrated T1 Service, Optional Calling Features, Operator Services, Directory Assistance and Directory Assistance Calling, Listing Services, Toll Restriction Services, Caller ID Blocking, Intercept Services. No other services or features in the Sprint Complete Access bundle will be discontinued.

Sprint plans to discontinue offering and providing these Sprint Integrated Local Services and associated features to its customers effective December 22, 2014, or as soon thereafter as the necessary regulatory approvals are obtained. The proposed discontinuance will not result in material harm to the affected customers because they may retain all of their other telecommunications services provided by Sprint and easily can obtain alternatives to Sprint Integrated Local Services from other service providers, many of which can provide local connectivity that is compatible with the customers' remaining Sprint Complete Access services. In the event that a customer's new local service provider does not provide local connectivity that is compatible with the customer's remaining Sprint Complete Access services, the customer will be able to find alternative providers of those services, which are readily available. Should a customer otherwise determine that he or she no longer wants to purchase the remaining Sprint services offered in the Sprint Complete Access bundle, the customer will be able to cease purchasing those services without penalty.

The Applicant provides the following information pursuant to Section 63.71 of the Commission's rules:

- <u>Name and Address of Carrier</u>: Sprint Communications Company L.P. is located at 6200 Sprint Parkway, Overland Park, Kansas 66251.
- 2. Date of Planned Service Discontinuance, Reduction, or Impairment: The Applicant plans to discontinue its provision of the Sprint Integrated Local Services and associated features described above effective December 22, 2014, or as soon thereafter in each state as the necessary regulatory approvals can be obtained. The Applicant understands that this Application automatically will be granted on the 31<sup>st</sup> day after public notice of its filing, unless the Commission notifies the Applicant to the contrary.
- Points of Geographic Areas of Service Affected: Sprint proposes to discontinue the provision of its Sprint Integrated Local Services and associated features in Arizona,

2

California, Colorado, District of Columbia, Florida, Georgia, Illinois, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, New York, Ohio, Oregon, Pennsylvania, Texas, Virginia, and Washington. A breakdown of impacted customer locations by state is shown below:

State	Number of Impacted Customer Locations	
Arizona	1	
California	25	
Colorado	3	
District of Columbia	3	
Florida	8	
Georgia	5	
Illinois	10	
Maryland	4	
Massachusetts	3	
Michigan	6	
Minnesota	2	
Missouri	9	
New Jersey	9	
New York	18	
Ohio	0	
Oregon	1	
Pennsylvania	12	
Texas	2	
Virginia	2	
Washington	2	
Grand Total	125 <sup>1</sup>	

<sup>&</sup>lt;sup>1</sup> In total, 86 unique customers are impacted. Several of these customers have service locations in multiple states.

- 4. <u>Brief Description of Type of Service Affected</u>: The Sprint Integrated Local Services affected by this discontinuance include unlimited business Local Exchange Service, Touch Tone Calling Service, Integrated T1 Service, and Digital Integrated T1 Service. The features associated with these services include Optional Calling Features, Operator Services, Directory Assistance and Directory Assistance Calling, Listing Services, Toll Restriction Services, Caller ID Blocking, Intercept Services, DID Numbers, and 9-1-1 Telecommunications Services.
- 5. Brief Description of the Dates and Methods of Notice to All Affected Customers: In accordance with Section 63.71(a), on July 21, 2014, Sprint provided written notice, by first class mail, to its affected subscribers. A sample copy of the Notice letter provided to customers is attached hereto as Attachment A. In an effort to aid customers with their transition to another service provider, this letter will be customized to provide information to each customer regarding a potential local service provider, and, where appropriate, to indicate the state public utility commission and its address if required under state rules.
- Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to Be Discontinued, Reduced, or Impaired: Applicant is considered nondominant with respect to the affected services.

In accordance with Section 63.71 of the Commission's Rules, a copy of this Application is being mailed to the Special Assistant for Telecommunications for the Secretary of Defense and to the public utility commission and the Governor of each state in which the discontinuance of service is proposed.

4

The public convenience and necessity will not be adversely affected by the discontinuance of the Sprint Integrated Local Services and features in question. The number of customers affected is limited, and all customers have been given notice affording them ample time to acquire one of the many substitute services that are readily available to them. Sprint, therefore, respectfully requests Commission approval of this Section 63.71 Application. Please direct any questions regarding this Application to the undersigned.

Respectfully submitted,

Sprint Communications Company L.P.

ES R.J. Did

Emily J. H. Daniels Lawler, Metzger, Keeney & Logan, LLC 2001 K Street, NW, Suite 802 Washington, DC 20006 Tel: (202) 777-7723 E-Mail: edaniels@lawlermetzger.com Counsel to Sprint Communications Company L.P.

W. Richard Morris Senior Counsel Sprint Corporation 6450 Sprint Parkway KSOPHN0314-3A671 Overland Park, KS 66251 Tel: (913) 315-9176 E-Mail: rich.r.morris@sprint.com

Dated: July 21, 2014

Attachment A



July 21, 2014

Joy Q. Sample 123 Main St. Anytown, USA, 12345-6789

## IMPORTANT NOTICE REGARDING DISCONTINUANCE OF SPRINT INTEGRATED LOCAL SERVICES

#### Account Number: \_\_\_\_\_

On December 22, 2014, or as soon thereafter as the necessary regulatory approvals can be obtained, Sprint Communications Company L.P. ("Sprint") will no longer provide certain Sprint Integrated Local Services and associated features (which, to date, have been provided to customers in Arizona, California, Colorado, District of Columbia, Florida, Georgia, Illinois, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, New York, Ohio, Oregon, Pennsylvania, Texas, Virginia, and Washington). The specific Sprint Integrated Local Services and associated features being discontinued include unlimited business Local Exchange Service, Touch Tone Calling Service, Integrated T1 Service, Digital Integrated T1 Service, Optional Calling Features, Operator Services, Directory Assistance and Directory Assistance Calling, Listing Services, Toll Restriction Services, Caller ID Blocking, Intercept Services, Direct Inward Dialing ("DID") Numbers, and 9-1-1 Telecommunications Services.

Due to changing market conditions, Sprint has determined that it should discontinue the Sprint Integrated Local Services and associated features described above. This discontinuance impacts the business local service (including business lines, Digital PBX Trunks, and ISDN PRI service) that Sprint provides to your company as part of the Sprint Complete Access Bundle. You will need to transition your service by December 22, 2014. In order to do so, you will need to choose another local service provider. Note that a new service provider may require approximately 90 days to provision service to you. As a result, we strongly recommend that you select a provider *no later than* September 22, 2014. You may obtain such replacement local exchange service, subject to the normal terms and conditions, from [name of service provider] by contacting them at [provider phone number]. There also may be other local exchange carriers operating in your area that could provide a comparable replacement service. An Internet search for "local exchange telephone service providers" in your city should provide you with several alternatives.

Many of these alternate providers offer local connectivity services that are compatible with any remaining Sprint Complete Access services that you may order, such as long distance voice service. In the event that your new local service provider is not compatible with the remaining Sprint Complete Access services to which you subscribe, you will need to find an alternate provider for those services as well. In this event, Sprint believes that *[name of service provider]* provides these services in conjunction with its local service in your area. You also may contact any of several companies that serve the business market in your area. An Internet search for "business Discontinue Sprint ILS July 21, 2014 Page 2 of 2

telecommunications service providers" in your area should provide you with several alternatives. Should you otherwise decide that you no longer wish to subscribe to your remaining Sprint Complete Access services, you may do so without penalty, and Sprint will return any deposit or credits to you.

Sprint has notified the Federal Communications Commission and the [appropriate state public utility commission] regarding its proposed discontinuance of service. The Federal Communications Commission will normally authorize this proposed discontinuance of service 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 Federal Communications Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, 445 12<sup>th</sup> Street, SW, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Sprint Communications Company L.P. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service. The [appropriate state public utility commission] also may consider this discontinuance. You may provide comments to the [appropriate state public utility commission] at [address].

If you have questions concerning this notice, please feel free to contact Sprint at 866-653-1056. We thank you for your business and look forward to continuing to serve you in other capacities.

Sincerely,

Sprint Communications Company L.P. 6200 Sprint Parkway Overland Park, Kansas 66251

#### **CERTIFICATE OF SERVICE**

I, Rhamie Glade, hereby certify that a copy of the foregoing Section 63.71 Application of Sprint Communications Company L.P. was served on this 21<sup>st</sup> day of July, 2014, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below:

Office of Governor Janice K. Brewer Executive Tower 1700 West Washington Street Phoenix, AZ 85007

Office of Governor Edmund G. Brown, Jr. State Capitol, Suite 1173 Sacramento, CA 95814

Office of Governor John W. Hickenlooper 136 State Capitol Denver, CO 80203-1792

Office of Mayor Vincent C. Gray 1350 Pennsylvania Avenue NW, Suite 316 Washington, DC 20004

Office of Governor Rick Scott The Capitol 400 South Monroe Street Tallahassee, FL 32399-0001

Office of Governor Nathan Deal 206 Washington Street 111 State Capitol Atlanta, GA 30334

Office of Governor Pat Quinn 207 State House Springfield, IL 62706

Office of Governor Martin O'Malley State House 100 State Circle Annapolis, MD 21401 Arizona Corporation Commission 1200 West Washington Phoenix, AZ 85007-2996

California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Colorado Public Utilities Commission 1560 Broadway, Suite 250 Denver, CO 80202

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

Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Georgia Public Service Commission 244 Washington Street, SW Atlanta, GA 30334-9052

Illinois Commerce Commission 527 East Capitol Avenue Springfield, IL 62701

Maryland Public Service Commission 6 St. Paul Street, 16th Floor Baltimore, MD 21202 Office of Governor Deval Patrick Massachusetts State House Room 105 Boston, MA 02133

Office of Governor Rick Snyder P.O. Box 30013 Lansing, MI 48909

Office of Governor Mark Dayton 116 Veterans Service Building 20 W. 12th Street St. Paul, MN 55155

Office of Governor Jay Nixon P.O. Box 720 Jefferson City, MO 65102

Office of Governor Chris Christie P.O. Box 001 Trenton, NJ 08625

Office of Governor Andrew M. Cuomo NYS State Capitol Building Albany, NY 12224

Office of Governor John Kasich Riffe Center, 30th Floor 77 South High Street Columbus, OH 43215-6117

Office of Governor John Kitzhaber State Capitol, Room 160 900 Court Street NE Salem, OR 97301

Office of Governor Tom Corbett 225 Main Capitol Building Harrisburg, PA 17120 Massachusetts Department of Public Utilities One South Station Boston, MA 02110

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

Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101-2147

Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, MO 65102

New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor P.O. Box 350 Trenton, NJ 08625-0350

New York State Public Service Commission Empire State Plaza Agency Building 3 Albany, NY 12223-1350

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

Public Utility Commission of Oregon P.O. Box 1088 Salem, OR 97308-1088

Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265 Office of Governor Rick Perry P.O. Box 12428 Austin, TX 78711-2428

.

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

Office of Governor Jay Inslee P.O. Box 40002 Olympia, WA 98504-0002

Secretary of Defense Attn: Special Assistant for Telecommunications Pentagon Washington, DC 20301 Public Utility Commission of Texas 1701 North Congress Avenue P.O. Box 13326 Austin, TX 78711-3326

Virginia State Corporation Commission Division of Communications P.O. Box 1197 Richmond, VA 23218

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250

amies Glade

Rhamie Glade