



April 5, 2016  
Via ETFS Filing

Spectrotel, Inc.  
3535 State Highway 66 Suite 7  
Neptune, NJ 07753

FRN: 0004333845  
Secretary, Federal Communications Commission  
Washington, DC 20554  
ATTN: Wireline Competition Bureau

RE: Spectrotel, Inc. and Its Affiliates  
Application to Discontinue Services

RECEIVED-FPSC  
2016 APR 12 AM 11:29  
COMMISSION  
CLERK

Dear Madam Secretary:

Enclosed please find the Application to Discontinue Services submitted on behalf of Spectrotel, Inc. and its affiliates. Specifically, Spectrotel is seeking approval to discontinue certain operator services throughout the United States. This filing is made pursuant to Title 47, Section 63.71.

A copy of this Application has been sent to the affected state Governors and Public Service / Utility Commissions as provided in Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stomas@tminc.com](mailto:stomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant to Spectrotel, Inc.

cc: Service List (via US Mail)  
Secretary of Defense, Pentagon (via US Mail)  
Rodney McDowell, FCC (via Email)  
file: Spectrotel - FCC - Other  
tms: FCx1601

ST/im

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

In the Matter of )  
Section 63.71 Application of )  
Spectrotel, Inc. and its Affiliates. )  
to Discontinue Services )

File No. \_\_\_\_\_

**Section 63.71 Application of Spectrotel, Inc. and its Affiliates**

Spectrotel, Inc. and its affiliates, Spectrotel of Alabama, LLC, Spectrotel of New England, LLC, Spectrotel of Maryland, LLC, Spectrotel of Pennsylvania, LLC, Spectrotel of New Jersey, LLC, and Spectrotel of New York, LLC, (collectively, "Spectrotel<sup>1</sup>" or "Applicant"), hereby seek authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue offering certain operator services throughout its service territory in the United States.

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

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

1. *Name and address of Carrier*

Spectrotel Inc. d/b/a One Touch Communications d/b/a Touch Base Communications d/b/a Surfstone

Spectrotel of Alabama, LLC d/b/a Touch Base Communications

Spectrotel of New England, LLC d/b/a One Touch Communications d/b/a Touch Base Communications d/b/a Surfstone

Spectrotel of Maryland, LLC d/b/a One Touch Communications d/b/a Touch Base Communications d/b/a Surfstone

Spectrotel of Pennsylvania, LLC d/b/a One Touch Communications d/b/a Touch Base Communications d/b/a Surfstone

Spectrotel of New Jersey, LLC d/b/a One Touch Communications d/b/a Touch Base Communications d/b/a Surfstone

Spectrotel of New York, LLC d/b/a One Touch Communications d/b/a Touch Base Communications d/b/a Surfstone

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<sup>1</sup> Spectrotel operates under the d/b/a's One Touch Communications, Touch Base Communications, and Surfstone.

The address for all entities is

3535 State Highway 66  
Suite 7  
Neptune, NJ 07753

Correspondence concerning this Application should be sent to:

Sharon Thomas  
Consultant to Spectrotel, Inc.  
Technologies Management, Inc.  
2600 Maitland Center Parkway, Suite 300  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [sthomas@tminc.com](mailto:sthomas@tminc.com)

2. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Spectrotel proposes to discontinue the operator services that are the subject of this Application on or after May 31, 2016, pending the Commission's approval of the discontinuance. As explained below, because Spectrotel relies on the wholesale provision of these services by its underlying carriers (e.g., AT&T and Verizon) to provide the services to its retail customers, it will not be able to provide the services once they are discontinued by the underlying carriers. AT&T proposes to discontinue its wholesale offering of the services on or after June 4, 2016,<sup>2</sup> and Verizon has announced to carriers that it intends to discontinue certain of the operator services on or after July 8, 2016.<sup>3</sup>

3. *Points of Geographic Areas of Service Affected:*

Applicant proposes to discontinue the provision of the operator services throughout its geographic service areas throughout the United States where it provides local service, which includes all of the 48 continental states and the District of Columbia.

4. *Brief Description of Types of Service Affected:*

Applicant proposes to discontinue the following Operator Services:

1. **Collect Calling** - a billing arrangement by which the charge for an operator assistance call may be reversed (charged to the called station) provided the charge is accepted at the called station.

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<sup>2</sup> Section 63.71 Application of AT&T, Docket No. 16-13; WCB File No. 1274.

<sup>3</sup> Verizon Industry Letter to CLEC, IXC, Resellers data October 9, 2015.

2. **Person-to-Person Calling** - a service where the person originating an operator assistance call specifies to the Company operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or particular PBX service point, department, or office to be reached.
3. **Billed to Third Party** - a billing arrangement by which an operator assistance call may be charged to an authorized station as determined by the Company other than the station originating the call or the station where the call is terminated.
4. **Busy Line Verification (BLV)** - allows an operator to establish a "talking" connection to an apparently busy station line to determine if the station line is in working order.
5. **Busy Line Interruption (BLI)** - allows an operator to interrupt a voice conversation in progress on a line to advise the interrupted subscriber that the interrupting party has a need to reach the subscriber.
6. **International Directory Assistance** - allows customers to obtain telephone numbers for international locations where such information is available

Spectrotel proposes to discontinue these services for two reasons. First, in those locations where AT&T or Verizon is the underlying ILEC, Spectrotel will no longer be able to offer these services on a retail basis once AT&T and Verizon discontinue their wholesale offerings Spectrotel operates by purchasing underlying network elements and wholesale services from ILECs, including operator services. There is no viable alternative that would enable Spectrotel to continue to offer the operator services to its retail customers once AT&T and Verizon discontinue the services.<sup>4</sup> Second, there is very low demand for these services, irrespective of the territory in which Spectrotel offers service. Therefore, Spectrotel intends to discontinue these offerings throughout its service territory, including locations where other ILECs such as CenturyLink and Frontier, have not yet proposed to discontinue these services.

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<sup>4</sup> Spectrotel believes that other ILECs, such as CenturyLink, may also discontinue these operator services in the near future.

These services have declined in popularity over the years due to the growth of other communication methods, including mobile phones, text messaging, email, and other social media applications. With respect to International Directory Assistance, many international telecommunications carriers no longer provide operator assistance services, which makes the service obsolete in those countries.

End users who want to continue to use certain of the alternative billing arrangements that will be discontinued can obtain comparable services from other wireline interexchange carriers. Equal access and toll presubscription continues to be available, therefore, customers can reach their preferred primary IXC operator by dialing 00, or can reach a different IXC using widely available dial around services such as 10XXX, 800 numbers, etc. For all of these reasons, the public convenience and necessity will not be impaired by the discontinuance of these services.

Spectrotel, through its underlying ILECs, will continue to provide Sent Paid Calls (e.g., direct dial assistance), and Emergency Call Assistance.

5. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice was provided via U.S. Mail as a bill message contained in customers' monthly bills, which were issued from March 8, 2016 through April 1, 2016. The customer notices are attached hereto as Exhibit A.

Notice has been sent to each of the affected state regulatory commissions, state governors' offices and the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

## Conclusion

Spectrotel respectfully requests that the Commission approve its Section 63.71 Application to discontinue the Operator Services described herein. Pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Spectrotel understands that this application will be automatically granted on the 31<sup>st</sup> day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 5<sup>th</sup> day of April, 2016.

By: /s/ Ross Artale

Ross Artale

President and Chief Operating Officer

Spectrotel, Inc. and its Affiliates

Sharon Thomas, Consultant to  
Spectrotel, Inc.  
Technologies Management, Inc.  
2600 Maitland Center Parkway, Suite 300  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [sthomas@tminc.com](mailto:sthomas@tminc.com)

**Exhibit A**

Text of Customer Notices

### Spectrotel Customer Notice

**Pending applicable regulatory approvals, on or after May 31, 2016, Spectrotel\*, located at 3535 State Highway 66, Suite 7, Neptune, NJ 07753, will no longer offer the following types of operator services: Person-to-Person, 3rd Number Billing, International Directory Assistance, Busy Line Verification/Interrupt and Collect Calls in all fifty states.**

The FCC 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 Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may 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 Spectrotel, Inc. and its Affiliates. 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.

\*Depending on your location, you may be served by Spectrotel, Inc. or one its affiliates, Spectrotel of New England, LLC, Spectrotel of New York, LLC, Spectrotel of Pennsylvania, LLC, Spectrotel of New Jersey, LLC, Spectrotel of Maryland, LLC or Spectrotel of Alabama, LLC.



### **Touchbase Customer Notice**

**Pending applicable regulatory approvals, on or after May 31, 2016, Touchbase\*, located at 3535 State Highway 66, Suite 7, Neptune, NJ 07753, will no longer offer the following types of operator services: Person-to-Person, 3rd Number Billing, International Directory Assistance, Busy Line Verification/Interrupt and Collect Calls in all fifty states.**

The FCC 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 Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may 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 Spectrotel, Inc. and its Affiliates. 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.

\*Touchbase is a tradename of Spectrotel, Inc. and its affiliates, Spectrotel of New England, LLC, Spectrotel of New York, LLC, Spectrotel of Pennsylvania, LLC, Spectrotel of New Jersey, LLC, Spectrotel of Maryland, LLC and Spectrotel of Alabama, LLC.

### **One-Touch Customer Notice**

**Pending applicable regulatory approvals, on or after May 31, 2016, One-Touch\*, located at 3535 State Highway 66, Suite 7, Neptune, NJ 07753, will no longer offer the following types of operator services: Person-to-Person, 3rd Number Billing, International Directory Assistance, Busy Line Verification/Interrupt and Collect Calls in all fifty states.**

The FCC 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 Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may 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 Spectrotel, Inc. and its Affiliates. 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.

\*One-Touch is a tradename of Spectrotel, Inc. and its affiliates, Spectrotel of New England, LLC, Spectrotel of New York, LLC, Spectrotel of Pennsylvania, LLC, Spectrotel of New Jersey, LLC, and Spectrotel of Maryland, LLC.

### **Surftone Customer Notice**

**Pending applicable regulatory approvals, on or after May 31, 2016, Surftone\*, located at 3535 State Highway 66, Suite 7, Neptune, NJ 07753, will no longer offer the following types of operator services: Person-to-Person, 3rd Number Billing, International Directory Assistance, Busy Line Verification/Interrupt and Collect Calls in all fifty states.**

The FCC 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 Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may 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 Spectrotel, Inc. and its Affiliates. 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.

\*Surftone is a tradename of Spectrotel, Inc. and its affiliates, Spectrotel of New England, LLC, Spectrotel of New York, LLC, Spectrotel of Pennsylvania, LLC, Spectrotel of New Jersey, LLC, and Spectrotel of Maryland, LLC.