

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

In the Matter of)
)
Section 63.71 Application of)
Mitel Cloud Services Inc.)
)
For Authority Pursuant to Section 214 of)
the Communications Act of 1934, as)
amended, to Discontinue the Sale of)
Certain Business Network Services and)
Provision of Certain Time Division Multiplex)
Services.)

WC Docket No. _____

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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**SECTION 63.71 APPLICATION
OF Mitel Cloud Services Inc.**

Mitel Cloud Services Inc. ("Applicant") seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, to grandfather and discontinue the new sales of certain business network services ("Business Network Services") and discontinue provision of certain Time Division Multiplexed Services ("TDM Services"), a subset of the Business Network Services, in all states and jurisdictions where the service is offered.

As of April 30th 2022, Applicant has prohibited new customers from ordering Business Network Services, and subject to Commission authorization, will discontinue provision of the TDM Services on or after December 31st 2022. Modifications in service offerings for customers with existing contracts are subject to the terms of their contracts. Alternative services are available from wide range of other providers.

Also, on August 16, 2022, Applicant sent copies of this Application via electronic mail or First Class Mail to the public utility commission and to the Governor of each affected state, federally-recognized tribal nations in each state, and the Secretary of Defense, Attention Special Assistant for Telecommunications, as required by Section 63.71(a) of the Commission's rules.

6. Whether the Carrier is Considered Dominant or Non-dominant with Respect to the Service to be Discontinued

Applicant is considered non-dominant with respect to the services to be discontinued.

CONCLUSION

The public convenience and necessity will not be adversely affected by the discontinuance of the services described herein. Therefore, Applicant respectfully requests that the Commission approve this Section 63.71 application.

Respectfully submitted,

Mitel Cloud Services Inc.

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Counsel for Mitel Cloud Services Inc.

Dated: August 16, 2022

Attachment B – Customer TDM Services End Of Life Notice

Dear Mitel Customer,

You may be aware that in March 2022 Mitel Cloud Services Inc, 1146 N Alma School Rd, Mesa, AZ 85201, United States announced to its partners by way of bulletin the end of general sale of all its network-based service solutions throughout the United States, including the District of Columbia and Puerto Rico, on 2022-04-30.

This includes sales of:

- Private Line
- Dedicated Internet
- MPLS
- Broadband (Cable and DSL)
- PRI
- SIP Trunks
- Dedicated Long Distance

In addition to the above, over the past couple of years, the industry has seen major carriers shift away from Time Division Multiplexing (TDM) technology due to the cost of maintaining this infrastructure. In line with this shift, the carriers are either introducing significant price increases or are outright disconnecting these services. Mitel recognizes these actions spread out over time have created a poor customer experience.

As such, subject to regulatory approvals, effective December 31st, 2022, Mitel is discontinuing (i.e., decommissioning) all TDM based circuits delivered with a T-1/DS-1, NxT-1/DS-1, DS-3, and OC-3 last mile. This includes those used in conjunction with MiCloud Flex, MiCloud Business, MiCloud Office, MiCloud Connect and Shoretel Sky.¹

¹ 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. 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 Mitel Cloud Services, Inc. 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.

Mitel Customers using the above-mentioned solutions will have an opportunity to migrate to our partner's unified communications service, RingCentral MVP.

Customers who migrate to RingCentral MVP will benefit from Mitel's complimentary Migration Assist Package, which features tools and support to complete migrations up to 75% faster than market standards. Mitel will waive any early termination fees (ETF), customers will be eligible for special pricing with RingCentral MVP, as well as up to 3-months-free service. Customers will also receive fully compatible certified Mitel phones, if their existing phones are not compatible.

3. Will Mitel continue to support our Ethernet and Broadband circuits?

Subject to any discontinuance of services by the underlying providers, current Ethernet customers will not be affected at this time.

4. My TDM circuit supported my voice traffic. Does Mitel have a replacement offer?

As of April 30th, 2022, subject to regulatory approval, Mitel is no longer providing new circuits. Customers must explore alternative options, including use of your ISP connection for this purpose, which could represent a cost savings opportunity for you.

Mitel customers will have the opportunity to enhance their overall unified communications offering by migrating to our partner RingCentral, with their RingCentral MVP product, and to capitalize on a number of incentives, as outlined in #2 above.

5. What markets are affected by the End of Life notice?

US, including the District of Columbia and Puerto Rico.

6. Who should customers contact for more information?

To discuss disconnect of your TDM circuit contact Mitel support.

For more information or to take advantage of the migration offer, customers should reach out to support for further information.

Alabama Public Service
Commission
100 North Union Street
Suite 850
Montgomery, AL 36104

Regulatory Commission of Alaska
701 West 8th Avenue
Suite 300
Anchorage, AK 99501-3469

Arizona Corporation
Commission
1200 West Washington
Street
Phoenix, AZ 85007-2996

Arkansas Public Service
Commission
1000 Center Street
Little Rock, AR 72201-4314

California Public Utilities
Commission
California State Building
505 Van Ness Ave
San Francisco, CA 94102-3298

Colorado Public Utilities
Commission
1560 Broadway
Ste. 250
Denver, CO 80202

Connecticut Public Utilities
Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Delaware Public Service
Commission
861 Silver Lake Boulevard
Cannon Building
Dover, DE 19904

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

Georgia Public Service
Commission
244 Washington Street
Atlanta, GA 30334

Hawaii Public Utilities
Commission
465 South King Street
Kekuanao'a Building
Honolulu, HI 96813

Idaho Public Utilities
Commission
11331 W. Chinden Blvd.
Building 8, Suite 201-A
Boise, ID 83714

Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Kansas Corporation
Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

Indiana Utility Regulatory
Commission
PNC Center
101 West Washington
Street, Suite 1500E
Indianapolis, IN 46204

Iowa Utilities Board
1375 E. Court Avenue
Des Moines, IA 50319

Kentucky Public Service
Commission
211 Sower Boulevard
Frankfort, KY 40601

Louisiana Public Service
Commission
PO Box 91154
602 North Fifth Street
Baton Rouge, LA 70821-
9154

Maine Public Utilities
Commission
18 State House Station
Augusta, ME 04333-0018

Maryland Public Service
Commission
16th Floor
6 St. Paul Street
Baltimore, MD 21202-6806

Massachusetts Department of
Public Utilities
One South Station
Boston, MA 02110

South Dakota Public Utilities
Commission
State Capitol
500 East Capitol Avenue
Pierre, SD 57501-5070

Tennessee Public Utility
Commission
502 Deaderick Street
4th Floor
Nashville, TN 37243

Public Utility Commission of
Texas
1701 North Congress Avenue
Austin, TX 78701-3326

Public Service Commission of
Utah
160 East 300 South
4th Floor
Salt Lake City, UT 84111

Vermont Public Utility
Commission
112 State Street
4th Floor
Montpelier, VT 05620-2701

Virginia State Corporation
Commission
1300 East Main Street
Tyler Building
Richmond, VA 23219

Washington Utilities and
Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Public Service Commission of
West Virginia
201 Brooks Street
Charleston, WV 25301

Public Service Commission of
Wisconsin
4822 Madison Yards Way
Madison, WI 53705

Wyoming Public Service
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Cheyenne, WY 82002

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Nashville, TN 37243

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P.O. Box 12428
Austin Texas 78711

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P.O. Box 142220
Salt Lake City, UT 84114-2220

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109 State Street, Pavilion
Montpelier, VT 05609

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P.O. Box 1475
Richmond, VA, 23218

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Office of the Governor
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Olympia, WA 98504-0002

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Office of the Governor
1900 Kanawha Street
Charleston, WV 25305

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Office of the Governor
115 East State Capitol
Madison, WI 53707

Mark Gordon
Office of the Governor
200 West 24th Street
Cheyenne, WY 82002

Public Service Commission
of the District of Columbia
1325 G Street, N.W., Suite
800
Washington, DC 20005

Muriel Bowser
Office of the Mayor
John A. Wilson Building
1350 Pennsylvania Avenue,
NW, Washington, DC 20004

Jordan Joaquin
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Yuma, Arizona, 85366

Department of Defense
Chief Information Officer
Pentagon
Washington, DC 20301

Coushatta Tribe of Louisiana	rrich@coushatta.org
Grand Traverse Band of Ottawa and Chippewa Indians, Michigan	David.Arroyo@gtbindians.com
Iowa Tribe of Kansas and Nebraska	trhodd@iowas.org
Jena Band of Choctaw Indians	Chief@jenachoctaw.org
Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas	Lester.Randall@ktik-nsn.gov
Prairie Band Potawatomi Nation	josephrupnick@pbpnation.org
Sac and Fox Nation of Missouri in Kansas and Nebraska	chief@sacandfoxnation-nsn.gov
Sault Ste. Marie Tribe of Chippewa Indians, Michigan	aaronpayment@saulttribe.net
Tunica-Biloxi Indian Tribe	msampson@paragoncasinoresort.com
Lower Sioux Indian Community in the State of Minnesota	robert.larsen@lowersioux.com
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Red Lake Band of Chippewa Indians	dseki@redlakenation.org
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Upper Sioux Community, Minnesota	kevinj@uppersiouxcommunity-nsn.gov
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Kewa Pueblo, New Mexico (Pueblo of Santo Domingo)	info@kewa-nsn.us
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Coquille Indian Tribe	tribalcouncil@coquilletribe.org
Cow Creek Band of Umpqua Tribe of Indians	vpence@cowcreek.com
Lower Brule Sioux Tribe of the Lower Brule Reservation, SD	Chairman@lbt.org
Burns Paiute Tribe	bptribalcouncil@burnspaiute.onmicrosoft.com
Confederated Tribes of Warm Springs	info@warmsprings.com
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