

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICE

MUMBAI, INDIA

September 14, 2011

*Via Electronic Filing*

Mr. Dave Danner  
Executive Director/Secretary  
Washington Utilities & Transportation Commission  
1300 South Evergreen Park Drive, SW  
P.O. Box 47250  
Olympia, WA 98504

**Re: *Informational Filing Regarding the Discontinuance of Certain Wholesale Telecommunications Services by XO Communications Services, Inc.***

Dear Mr. Danner:

XO Communications Services, Inc (“XOCS”), by its attorneys, hereby respectfully notifies the Washington Utilities & Transportation Commission (“Commission”) of its intention to discontinue the provision of selected domestic telecommunications and VoIP services – namely, Carrier Long Distance Termination Services and VoIP Termination Services – to a limited number of wholesale customers in Washington. Importantly, XOCS will continue to provide competitive telecommunications services in its existing markets in Washington. Accordingly, XOCS is not surrendering its telecommunications certificate.<sup>1</sup>

XOCS is a Delaware corporation and a direct, wholly-owned subsidiary of XO Communications, LLC (“XO LLC”), a Delaware limited liability company. XO LLC is a leading national provider of local and long distance telecommunications services to businesses, large enterprises and telecommunications carriers through its operating subsidiaries, primarily XOCS. XOCS is authorized to provide competitive telecommunications services in 49 states and the District of Columbia. XOCS and XO LLC are located at 13865 Sunrise Valley Drive, Herndon, Virginia 20171, (703) 547-2000.

<sup>1</sup> XOCS was authorized to provide local and interexchange services in Washington in docket UT-041511 on December 31, 2004.

Mr. Dave Danner  
September 14, 2011  
Page 2 of 3

In an effort to streamline its product set and focus its resources on its core IP and data services, XO has decided to discontinue providing Carrier Long Distance Termination Services and VoIP Termination Services, both of which are high volume switched intercity termination products sold to XO Carrier Services customers on a wholesale basis. The services to be discontinued currently are provided to other telecommunications carriers, interconnected VoIP providers and providers of information/enhanced services. The proposed discontinuance will not result in harm to the affected customers because these customers are sophisticated purchasers of high volume communications services that can easily migrate to alternative service providers. Numerous other CLECs, ILECs, IXCs and VoIP providers offer similar interstate switched termination services in all areas where XO plans to discontinue service.

As noted, XOCS is not surrendering its telecommunications certificate in Washington. The Company will continue to provide a competitive range of telecommunications services in Washington. Moreover, the proposed discontinuance will not reduce, impair or otherwise affect XOCS's other telecommunications service offerings. Indeed, by discontinuing the provision of the Carrier Long Distance Termination Services and VoIP Termination Services to a small number of wholesale customers, XOCS will be better able to focus on the provision of quality communications services to its remaining customer base, which comprises the overwhelming majority of XOCS's current operations. Therefore, the proposed discontinuance not only holds no significant adverse effects but will be beneficial to the majority of XOCS customers in Washington and is therefore in the public interest.

On August 31, 2011, XOCS provided written customer notice in accordance with the requirements of Section 63.71(a) of the FCC's Rules and filed a discontinuance application with the FCC on September 14, 2011. A copy of the customer notice, sent by U.S. mail, postage prepaid, is appended hereto as *Exhibit A*. XOCS plans to discontinue Carrier Long Distance Termination Services and VoIP Termination Services on November 1, 2011.

KELLEY DRYE & WARREN LLP

Mr. Dave Danner  
September 14, 2011  
Page 3 of 3

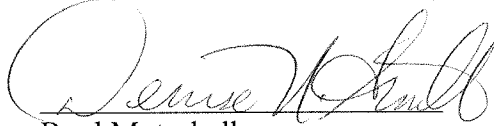
It is our understanding that no formal Commission approval of the service discontinuance described herein is required. *Thus, XOCS requests that this filing not be docketed.* XOCS submits this letter for the Commission's information only and requests that it be retained in the appropriate file.

Questions regarding this letter may be addressed to Denise N. Smith at Kelley Drye & Warren LLP, 3050 K Street, NW, Suite 400 Washington, D.C. 20007 (202) 342-8614, dsmith@kelleydrye.com.

Respectfully submitted,

XO Communications Services, Inc.

By:



Brad Mutschelknaus

Denise N. Smith

KELLEY DRYE & WARREN LLP

3050 K Street, NW

Suite 400

Washington, D.C. 20007

(Tel) (202) 342-8400

(Fax) (202) 342-8451

Its Counsel

# **Exhibit A**

Customer Notice



13966 Sunrise Valley Drive  
Herndon, VA 20171

**VIA OVERNIGHT COURIER**

August 31, 2011

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Re: IMPORTANT NOTICE REGARDING DISCONTINUANCE OF SERVICE

Dear Sir or Madam:

Effective November 1, 2011, XO Communications Services, LLC, and its affiliates, XO Virginia, LLC, and Telecommunication of Nevada, LLC (collectively "XO"), no longer will be providing "Carrier Long Distance Termination Services" or "VoIP Termination Services," both of which are switched inter-city termination products sold to XO Carrier Services customers on a wholesale basis. This discontinuance impacts service in the District of Columbia and all states except Alaska and Hawaii. You are receiving this notice because your company appears in XO's records as a "customer-of-record" of these services. As a result, we are furnishing you with notice sufficient to allow you to evaluate alternative providers, if you currently are using either or both of these services.

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 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 XO Communications Services, LLC, XO Virginia, LLC, and Telecommunication of Nevada, LLC. 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.

If you have any questions, please contact your Account Executive or Customer Service Manager. We thank you for your business and look forward to continuing to serve you in other capacities.

Sincerely,

XO COMMUNICATIONS