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September 21, 2011

***Via Electronic Filing***

Mr. David 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 Postpaid Calling Card 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 its provision of selected domestic telecommunications service to a limited number of enterprise customers. Specifically, XOCS is discontinuing the provision of its postpaid calling card service ("Calling Card") to a limited number of its enterprise 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 organized pursuant to the laws of Delaware and is 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

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

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subsidiaries, primarily XOCS. XOCS and its affiliates are 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.

XOCS has received notice from its underlying vendor for Calling Card Services that as of October 31, 2011, such vendor will no longer be supporting such services. In addition, XOCS is in the process of streamlining its product offerings. Accordingly, XOCS has decided to discontinue its Calling Card Services to better focus on those services most requested by its customers. The Calling Card service enables enterprise customers to access a variety of services including the ability to make long distance and international telephone calls and to access certain enhanced features, such as message storage and broadcast, by dialing an access number and entering a PIN code, when the customer is away from the office. XOCS's Calling Card service is offered as an adjunct to an enterprise customer's traditional telecommunications services and is not an independent service offering. The proposed discontinuance of XOCS's Calling Card service will not result in harm to the affected customers because the Calling Card service generally is infrequently used and customers will retain all of their traditional telecommunications services provided by XOCS.<sup>2</sup> Further, the affected customers are sophisticated purchasers of communications services and can easily obtain alternatives to the Calling Card service, including use of cellular telephones or services from other service providers, in all of the areas where XOCS plans to discontinue the 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. By discontinuing the provision of a single, infrequently-used service, that is only an adjunct to traditional services, XOCS will be better able to focus on the provision of quality communications services to its customers. 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 September 20, 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 20, 2011. A copy of the customer notice, sent by U.S. mail, postage prepaid, is appended hereto as *Exhibit A*. XOCS plans to discontinue its Calling Card service on October 31, 2011.

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<sup>2</sup> XOCS's records indicate that it has 24 customers in Washington using the Calling Card service. In addition, because XOCS's Calling Card service is provided on a postpaid basis, there are no issues regarding deposits and refunds to the affected customers.

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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 (202) 342-8614 or via e-mail at [dsmith@kelleydrye.com](mailto:dsmith@kelleydrye.com).

Respectfully submitted,

XO Communications Services, Inc.

By: 

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*Its Counsel*

# **Exhibit A**

Customer Notice

September 20, 2011

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Re: IMPORTANT NOTICE REGARDING DISCONTINUANCE OF SERVICE

Dear Sir or Madam:

Effective October 31, 2011, XO Communications Services, LLC and its affiliates, XO Virginia, LLC, and Telecommunication of Nevada, LLC (collectively, "XO"), will no longer be providing to customers Calling Card Services. Calling Card Services enable enterprise customers to access a variety of services, including the ability to make long distance and international telephone calls, and to access certain enhanced features, such as message storage and broadcast, by dialing an access number and entering a PIN code when the customer is away from the office. XO has received notice from its underlying vendor for Calling Card Services that as of October 31<sup>st</sup>, such vendor will no longer be supporting Calling Card Services. In addition, XO is in the process of streamlining its product offerings. Accordingly, XO has decided to discontinue its Calling Card Services to better focus on those services most requested by our customers. You are receiving this notice because your company appears in XO's records as a "customer-of-record" of Calling Card Services. As a result, we are furnishing you with notice sufficient to allow you to evaluate alternative providers, if you currently are using this 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 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 XO Communications Services, 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 choose to do so, you may also contact your state's public utility commission. Please reference the following link for the contact information for your state's public utility commission: [www.xo.com/callingcard](http://www.xo.com/callingcard).

If you have any questions, please contact your Customer Service Manager or Customer CARE at 800-424-0583. We thank you for your business and look forward to continuing to serve you in other capacities.

Sincerely,

XO COMMUNICATIONS