

December 8, 2015

**VIA EMAIL – records@wutc.wa.gov
& UPS OVERNIGHT**

Steven King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Re: Joint Notice of First Communications, LLC and Comcast Phone of Washington, LLC to Advise the Commission of a Transfer of Customers

Dear Mr. King:

On behalf of First Communications, LLC (“First Communications”) and Comcast Phone of Washington, LLC d/b/a CIMCO, a Division of Comcast Business Service (“Comcast Phone,” and together with First Communications the “Parties”), this letter advises the Washington Utilities and Transportation Commission (“Commission”) that the Parties have entered into an Asset Purchase Agreement whereby First Communications will acquire certain customer accounts of Comcast Phone (the “Transaction”). Pursuant to WAC 480-121-063, the Parties understand that Commission approval is not required for this Transaction. Accordingly, this letter is filed for informational purposes only to ensure the continuing accuracy of the Commission’s records.

In furtherance of this notice, the Parties provide the following information:

I. THE PARTIES

A. First Communications, LLC

Founded in 1998, First Communications is an Ohio limited liability company with its principal business at 3340 W Market St, Akron, OH 44333. First Communications is a wholly owned subsidiary of Summit Data Services, Inc., an Ohio corporation. First Communications’ operations are overseen by a well-qualified management team with substantial experience and technical expertise. In Washington, First Communications has competitive classification and is authorized to provide local exchange and interexchange telecommunications services pursuant to authority granted by this Commission in Docket No. UT-061244 on August 26, 2006 and January 22, 2007. Further information regarding First Communications services and its legal, technical, managerial and financial qualifications to provide service was previously submitted to the Commission and is therefore a matter of public record. First Communications respectfully requests that the Commission take official notice of that information and incorporate it herein by reference.

B. Comcast Phone

Comcast Phone is a Delaware limited liability company with its principal place of business at One Comcast Center, Philadelphia, Pennsylvania, 19103-2838. Comcast Phone is a facilities-based local exchange carrier, as defined by 47 U.S.C. § 153(26), and is registered to provide facilities-based local exchange and interexchange services in Washington.¹ In Washington, ten (10) resold interexchange business customers and no residential customers will be affected by the Transaction. None of the affected customers in Washington receive local exchange services.

II. DESIGNATED CONTACTS

The designated contacts for all correspondence, notices, inquiries, and orders in relation to this notice are:

For First Communications:

Catherine Wang
Danielle Burt
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With copies to:

Sandi R. Murphy
SVP and General Counsel
First Communications, LLC
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For Comcast Phone:

Mark Trincherro
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With copies to:

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¹ Comcast Phone is registered pursuant to the Order issued in Docket No. UT-010681 on July 11, 2001 and is also a competitively classified telecommunications company.

Richard Chapkis
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III. DESCRIPTION OF TRANSACTION

On November 17, 2015, Comcast Cable Communications, LLC, on behalf of itself and its affiliates, including Comcast Phone, entered into an Asset Purchase Agreement (“Agreement”) with First Communications. Pursuant to the Agreement, the Parties propose to assign certain customers in Washington, including resold interexchange telephone service customer accounts and related data, databases, and customer records needed to support the provision of telecommunications services to those customers, from Comcast Phone to First Communications.

The specific assets that First Communications is acquiring are those that were formerly owned by CIMCO Communications, which Comcast Phone has served since 2010 under the trade name, “CIMCO, a Division of Comcast Business Services.” As a result of the Transaction, First Communications will replace Comcast Phone as the service provider to the affected customers. Except for the sale of these customer accounts, Comcast Phone’s remaining, non-CIMCO operations will be unaffected by the Transaction.

Following completion of the Transaction, all of the affected customers will continue to receive service from First Communications under the same rates, terms and conditions as currently provided by Comcast Phone. Future changes in the rates, terms and conditions of service for customers will be undertaken pursuant to applicable federal and state notice and tariff requirements.

Pursuant to Section 64.1120(e) of the rules of the Federal Communications Commission, 47 C.F.R. § 64.1120(e) and WAC 480-120-147(7), written notice was provided to the affected customers via First Class mail on November 25, 2015, more than 30 days prior to the anticipated closing date. A copy of the notice customers received is attached as **Exhibit A**.

IV. PUBLIC INTEREST CONSIDERATIONS

The Parties submit that the proposed Transaction will serve the public interest. The Transaction will ensure that customers will continue to receive high-quality telecommunications service without interruption, and at the same rates, terms and conditions as they currently enjoy, from an experienced and qualified carrier eager to serve this segment of the market. The

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Transaction also will assure an orderly transition of affected customers from Comcast Phone to First Communications.

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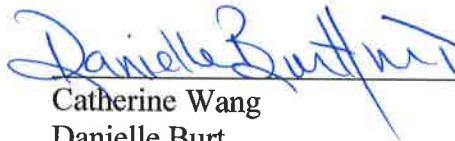
An original plus three (3) copies of this letter are being provided. Please acknowledge receipt of this filing by date-stamping the extra copy of this letter and returning it in the self-addressed stamped envelope provided for this purpose. Should you have any questions regarding this notification, please do not hesitate to call the undersigned.

Respectfully submitted,



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Counsel for First Communications, LLC

EXHIBIT A

Customer Notification Letter



November 23, 2015

Dear Valued CIMCO Customer:

We are excited to announce that First Communications, LLC soon will become your telecommunications services provider, pursuant to an agreement between First Communications and your current provider, CIMCO, A Division of Comcast Business Services ("CIMCO").¹ The transfer to First Communications will occur on or after January 1, 2016, subject to the satisfaction of certain regulatory requirements. First Communications is committed to earning and keeping your business and will assure that you continue to receive the same great service and dedication to your telecommunications needs as you currently receive.

Your transition from CIMCO to First Communications requires no action on your part.

This change will be completely seamless, and you do not need to do anything in order for it to occur. Following the transfer to First Communications, you will continue to receive telecommunications services with the same features and at the same rates, terms and conditions as you currently enjoy. Any changes to your service following the transaction will be made in compliance with your contract, service terms and applicable federal and state legal and regulatory requirements. We do not anticipate that this transition to First Communications will cause you to incur any carrier change charges, but if you do, First Communications will pay them.

It is important that you be aware of the following information. You are responsible for continued payment of your monthly recurring and usage charges. If, for any reason, you should choose another provider for your telecommunications services you will need to contact that provider directly to arrange for the change before First Communications becomes your provider.² Otherwise, your telecommunications service(s) will automatically be transferred without service interruption from CIMCO to First Communications. If you paid a deposit or prepayment, it will be transferred to your First Communications account. In addition, if you have a preferred carrier freeze on your account, it will be lifted to make the transfer and you will need to contact your local service provider to arrange a new freeze.

Headquartered in both Chicago, Illinois and Akron, Ohio, First Communications has been providing voice, data networking and managed services to the business community since 1998. At First Communications our commitment to customer service crosses all levels of our organization: from the associate who answers customer calls in our Akron-based Care and Repair Center; to the certified engineers in our Chicago-based Network Management Center who, around the clock, proactively monitor customer networks; to the Account Managers who

¹ "CIMCO" is the trade name of the applicable Comcast Phone affiliate operating in your state, and an indirect, wholly-owned subsidiary of Comcast Corporation.

² Generally, you can find a list of alternative providers in the telephone book or from your state public utility regulatory agency. Please note that your right to switch providers is subject to the terms of your existing contract or service order. In addition, you may incur service initiation fees from a new provider such as service order, installation and other similar charges associated with establishing a new service account.

make it their business to know our customers. It is our dedication to customers that makes First Communications a trusted partner.

If you would like more information about the transaction or the transfer of your telecommunications services from CIMCO to First Communications, please call First Communications Vice President of Customer Engagement, Jamie Rowlands, at 1-800-344-3983. Prior to the transfer, you may also continue to contact CIMCO with any questions or concerns you may have about your current services.

We at First Communications look forward to serving you.

Sincerely,

Margi Shaw
President
First Communications

Jay Dirkmaat
Vice President
Comcast Business Services