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July 8, 2016

VIA OVERNIGHT DELIVERY

Mr. Steven King, Executive Director/Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

**RE: AT&T Corp., SBC Long Distance, and Teleport Communications of America, LLC
Notice Pursuant to WAC 480-120-083 of Discontinuance of Certain Operator Services in
Washington**

Dear Mr. King:

AT&T Corp., SBC Long Distance and Teleport Communications of America, LLC (collectively, "AT&T"), provide notification to the Washington Utilities and Transportation Commission ("Commission") that it has discontinued its provision of five (5) operator services in the state. The specific operator services include, collect calling, busy line verification (BLV), busy line interruption (BLI), billed to third party, and person to person calling due to extremely low demand. The following is a more detailed description of each of these services:

- **Bill to a Third Number** - a billing arrangement by which a call may be charged to a number other than the party originating the call or the party that is being called;
- **Busy Line Verification** - is a service by which an operator, at the request of a calling party, determines and reports the status of a line (e.g. conversation in progress, no conversation in progress).
- **Busy Line Emergency Interrupt** - is a service by which an operator, at the request of a calling party, will determine and report that a conversation is in progress and subsequently interrupt the conversation to inform the parties to that conversation that another party desires to place a call to the busy line.
- **Collect Calling** - a billing arrangement by which the charge for a call may be reversed (charged to the called party) provided the charge is accepted by the called party;
- **Person to Person Calling** - a service where the person originating an operator assisted call specifies to the operator a particular person to be reached, a particular mobile service point to be reached through a Mobile Telephone Service attendant, or a particular PBX service point, department, or office to be reached;

STATE OF WASHINGTON
UTILITY AND TRANSPORTATION COMMISSION
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RECEIVED
ADMINISTRATIVE SERVICES

AT&T has experienced a significant decrease in the demand for operator services over the years. Customers are taking advantage of new technologies and services to communicate, such as mobile calling, text messaging, instant messaging, social media, voicemail and email.

AT&T does not have customers per se for these services as they are transactional in nature. Instead, AT&T has call volumes for these services for the 2015 calendar year which include all calls (interstate and intrastate) for all three legal entities that provide this service in Washington. Total call volume – interstate and intrastate – for AT&T Corp., SBC Long Distance and Teleport Communications of America, LLC for calendar year 2015 is: Bill to Third (5); BLI (0); BLV (1); Collect (53 completed); and, person-to-person (3).

On January 6, 2016, AT&T filed with the Federal Communications Commission (“FCC”) an application seeking authorization, pursuant to 47 U.S.C §214(a) and 47 C.F.R. §63.71 to discontinue the five operator services referenced above along with international directory assistance, which is not an intrastate service.¹ As explained in that filing, the demand for operator services has decreased dramatically.² A copy of the filing AT&T made with the FCC was sent to the Commission via first class U.S. mail on or around January 6, 2016.³ AT&T’s FCC application was deemed granted on March 15, 2016. As a result, AT&T discontinued the six operator services listed in the FCC application on March 18, 2016 for consumer and business retail customers.

AT&T recently discovered that it inadvertently did not file a separate notice with the Commission as required by WAC 480-120-083(2)(a). AT&T apologizes for this oversight and has implemented process improvements to avoid this error in the future. The following paragraphs discuss the information required by WAC 480-120-083.

WAC 480-120-083(2)(c) requires notice to be provided to customers at least 30 days in advance. AT&T provided notice of the discontinuance of this service in each customer’s bill between September 28, 2015 and December 31, 2015. Examples of the notice included in customers’ bills is provided as Attachment A. In addition, AT&T posted copies of its customer notifications on several locations on its websites. Further, beginning on October 1, 2015, when an AT&T customer used one of the impacted operator services, an AT&T operator informed the customer of the proposed discontinuance, and provided a phone number where the customer could obtain additional information.

AT&T did not need to send the other notices required in subsection (2) as they are not applicable to the operator services that were discontinued. Subsection 2(b) deals with 911 service, and does not apply to this service. Subsection 2(d) and (e) also do not apply to AT&T’s discontinuance of operator services. Subsection 2(f) requires notice to the numbering administer; however, no numbers are to be returned with the discontinuance of this service.

¹ *In the Matter of Section 63.71 Application of AT&T Alaska, AT&T Communications of Indiana, LLC, AT&T Communications of New York, Inc., AT&T Communications of Texas, LLC, AT&T Communications of Virginia, LLC, AT&T Corp., BellSouth Telecommunications, LLC, BellSouth Long Distance, Illinois Bell Telephone Company, Indiana Bell Telephone Company, Inc., Michigan Bell Telephone Company, The Ohio Bell Telephone Company, Pacific Bell Telephone Company, SBC Long Distance, Southwestern Bell Telephone Company, Teleport Communications of America, LLC, Teleport Communications Group, and Wisconsin Bell, Inc. for Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue the Provision of Service*, FCC 16-13 (filed January 6, 2016).

² *Id.*, p. 4-5.

³ The address the notification was sent to was PO Box 47250, Olympia, WA 98504-7250.

Subsection (3) requires that the notice to the Commission contain certain information. In compliance with that section, AT&T provides the following. The five operator services discussed above were provided by AT&T Corp., SBC Long Distance and Teleport Communications of America, LLC. These services, both intrastate and interstate, were discontinued in Washington on March 18, 2016. Information regarding the number of customers for each service is described above. These services were previously available to any AT&T customer in Washington on a non-subscription or transaction basis.

AT&T again apologizes for not providing this notice to the Commission prior to the discontinuance of the five operator services discussed above. Nevertheless, customers received prior notification of the discontinuance.

If you have any additional questions, please contact me at 512-330-1698.

Sincerely,

Sharon Mullin by Doc with permission

Sharon Mullin

cc: Tim Zawislak
Rebecca Beaton

STATE OF TEXAS
DEPARTMENT OF
COMMUNICATIONS
2016 JUL 11 AM 10:09
COMMUNICATIONS

Exhibit A
Examples of Customer Notice

SERVICE WITHDRAWAL

Pending federal and state regulatory approval where applicable, on or after March 18, 2016, SBC Long Distance, LLC d/b/a SBC Long Distance d/b/a AT&T Long Distance will discontinue the following services originating and terminating in the United States, the District of Columbia, Puerto Rico, the U.S. Virgin Islands and all international locations: Bill to a Third Number, Busy Line Verify / Interrupt, Collect, International Directory Assistance Service and Person-to-Person. 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 30 days after the Commission releases public notice of the proposed discontinuance. You may file them 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 563.71 Application of SBC Long Distance, LLC d/b/a SBC Long Distance d/b/a AT&T Long Distance. 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. AT&T Customer Service can be reached at the toll-free number on your bill or V/TTY at 711. Thank you, AT&T, 60 West Avenue, Room 405, Wayne, PA. 19087.

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Service Withdrawal Pending federal and state regulatory approval where applicable, on or after March 18, 2016, AT&T Corp. will discontinue the following services originating and terminating in the United States, the District of Columbia, Puerto Rico, the U.S. Virgin Islands and all international locations: Bill to a Third Number, Busy Line Verify / Interrupt, Collect, International Directory Assistance, and Person-to-Person. 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 AT&T Corp., AT&T Communications of Indiana, LLC, AT&T Communications of New York, Inc., AT&T Communications of Texas, LLC, AT&T Communications of Virginia, LLC, AT&T Alaska and Teleport Communications Group. 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. AT&T Customer Service can be reached at the toll-free number on your bill or V/TTY at 711. Thank you, AT&T, 60 West Avenue, Room 405, Wayne, PA. 19087.