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August 15, 2016

**VIA OVERNIGHT DELIVERY**

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

2016 AUG 16 AM 9:35

**RE: AT&T Corp. Notice Pursuant to WAC 480-120-083 of Discontinuance of Certain Calling Card Services in Washington**

Dear Mr. King:

AT&T Corp. (“AT&T”) provides notification to the Washington Utilities and Transportation Commission (“Commission”) that it plans to discontinue residential and business calling card services effective on or after October 1, 2016 in compliance with WAC 480-120-083(2)(a). This discontinuance is subject to FCC authorization and will not impact prepaid calling cards and pre-paid minutes provided by AT&T.

On August 1, 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 residential and business calling card services. As explained in that filing, calling card usage has been declining for several years. A copy of the filing AT&T made with the FCC is included as Attachment A and was sent to the Commission via first class U.S. mail on or around August 1, 2016.<sup>1</sup>

Specifically, AT&T plans to discontinue residential and business calling card services including AT&T CIID/891 Card, AT&T Military Calling Card, AT&T Global Calling Card, and the Commercial Calling Card. These calling card services allows users to place intrastate, interstate and/or international calls by dialing a company-provided toll-free access code or number.

The public convenience and necessity will not be impaired by this service discontinuance because calling card usage has been declining for several years. This is due to the market growth of other communication methods, including mobile phones, email, social media streams and voice over IP. As mentioned above, this discontinuance will not impact prepaid calling cards and prepaid minutes provided by AT&T.

<sup>1</sup> The address the notification was sent to was PO Box 47250, Olympia, WA 98504-7250.

Examples of the residential and small business customer notices as required to be filed with the WUTC pursuant to WAC 480-120-083(2)(a) are provided as Attachment B and have been included in customer bills. In addition, AT&T posted copies of its customer notifications on its website and AT&T's operators will refer customers to a recording of the notice upon receiving an inquiry concerning these calling card services.<sup>2</sup>

WAC 480-120-083(2)(c) requires notice to be provided to customers at least 30 days in advance. AT&T has sent and will continue to send notice to the majority of its residential customers in their June through September 2016 bills. On July 23, 2016, AT&T mailed its customer notice to the remaining residential customers for which it has no direct billing relationship. AT&T will provide a second notice to these customers, which is scheduled to be mailed on September 10. AT&T also sent notice to its business customers that it has a direct billing relationship with in their July 2016 bill.<sup>3</sup> For customers that reside in Independent Telephone Company ("ICO") areas, and for which AT&T does not have a direct billing relationship, AT&T arranged for the ICOs to send notice to the residential and business customers in the July 2016 bills.

AT&T did not need to send the other notices required in subsection (2) as they are not applicable to the calling card services that are to be 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 calling card services. Subsection 2(f) requires notice to the numbering administrator; however, no numbers are to be returned with the discontinuance of this service.

Subsection (3) requires that the notice to the Commission contain certain information. In compliance with that section, AT&T provides the following. The calling card services discussed above are provided in Washington by AT&T Corp. These services, both intrastate and interstate, are being discontinued in Washington on or after October 1, 2016. With the discontinuance, customers are not losing their local or long distance service or the ability to reach the network to place calls.

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

Sincerely,

  
Sharon Mullin

cc: Tim Zawislak  
Rebecca Beaton

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<sup>2</sup> <http://serviceguide.att.com/service/library/ext/aslststate.cfm?state=WA#> and 1-888-882-5840 or 1-888-626-3570.

<sup>3</sup> AT&T will continue to include the notification in its July, August and September, 2016 residential customer bills, and AT&T is also sending a duplicate notice to business customers in their August and September, 2016 bills.