Morgan Lewis

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March 30, 2017

VIA E-FILING

Steven V. King, Executive Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive Olympia, WA 98504-7250 records@wutc.wa.gov

Re: Notification of ANPI Business, LLC Regarding the Planned Discontinuance of Residential Long Distance Services

Dear Ms. Paske:

On behalf of ANPI Business, LLC (the "Company") and pursuant to WAC 480-120-083(2)(a), this letter notifies the Washington Utilities and Transportation Commission ("Commission") of the Company's intention to discontinue all residential long distance services, including but not limited to 1+, MTS, and toll free services. Since some small businesses may receive residential long distance services, the discontinuance may also affect certain small businesses customers in addition to residential customers.

Description of the Company

The Company, a Delaware limited liability company, has its principal office at 2300 Berkshire Lane North, Suite 4, Minneapolis, Minnesota 55441. The Company provides wholesale and retail interexchange service throughout the U.S., and is authorized to provide competitive local exchange service in a limited number of states. In Washington, the Company is authorized as a telecommunications company with competitive classification pursuant to a Certificate of Registration granted in Docket No. UT-001362. The Company is also authorized by the FCC to provide interstate and international telecommunications services.

Description of the Service Affected

The Company intends to discontinue all residential international services, including but not limited to 1+, MTS and Toll Free services. Since some small businesses may receive the affected residential long distance product, the discontinuance may also affect certain small businesses customers. This discontinuance will affect approximately 59 customers in Washington.

Morgan, Lewis & Bockius LLP

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1 +1.202.739.3000 **b** +1.202.739.3001 Steven V. King, Executive Secretary March 30, 2017 Page 3

The Company has not collected deposits from any affected customers. Any monthly recurring charges will be prorated for the last month of service based on when the affected customer notifies the Company that the customer has selected another provider. That prorated portion of the monthly recurring charges will appear as a credit on the customer's "final invoice" and refunded as needed. Usage charges are billed in arears.

The Company submits that the public interest will not be harmed by the discontinuance. Further, the proposed discontinuance will not result in material harm to the affected customers because they easily can obtain alternative services from other wireline interexchange carriers or other providers such as interconnected voice over Internet protocol providers. The Company is a non-dominant carrier with respect to the services to be discontinued. The Company will take reasonable steps, to the extent it is able, to assure that the discontinuance of services is not unduly disruptive to the present or future public convenience or necessity.

The Company will continue to provide other interexchange and local exchange services to other non-residential customers. Therefore, the Company does not seek to surrender its Certificate at this time.

Date of Planned Service Discontinuance

The Company plans to discontinue providing residential long distance services as of June 1, 2017, or as soon thereafter as any regulatory approvals can be obtained. The Company's largest underlying provider, Sprint Communications Company L.P. ("Sprint"), has notified the Company that the services that the Company uses to provide long distance services to certain of the Company's customers will not be available beyond June 2017. Therefore, it is critical that the Company discontinue residential long distance services as of June 1, 2017.

Required Notices

The Company has provided its customers notice of the discontinuance pursuant to WAC 480-120-083(2)(c). Specifically, the Company sent notice of the discontinuance to all affected customers via first class mail on March 17, 2017. A copy of the notice is attached as <u>Exhibit A</u>. No notices are required under WAC 480-120-083(2)(b), (d) or (f), as the Company is not discontinuing services related to the state 911 program; is not provided with unbundled network elements by ILECs; and is not releasing assigned telephone numbers. Pursuant to WAC 480-120-083(2)(e), the Company has or will notify its underlying provider(s) in Washington of the services it is discontinuing.

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Designated Contacts

Questions or any correspondence, orders or other materials pertaining to this filing should be directed to the following:

Russell M. Blau	With a copy to:
Brett P. Ferenchak	
Morgan, Lewis & Bockius LLP	Ryan Tackett
1111 Pennsylvania Ave, N.W.	ANPI Business, LLC
Washington, DC 20004	2300 Berkshire Lane North, Suite 4
Tel: 202-739-3000	Minneapolis, MN 55441
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Please acknowledge receipt and acceptance of this filing. Should you have any questions regarding this filing, please do not hesitate to contact us.

Respectfully submitted,

/s/ Brett P. Ferenchak

Russell M. Blau Brett Ferenchak

Counsel to ANPI Business, LLC

<u>Exhibit A</u>

Customer Notice



NOTICE OF LONG DISTANCE SERVICES DISCONTINUANCE DO NOT DISREGARD THIS NOTICE

March 17, 2017

RE: Account #[Customer Acct # here]

Dear Customer:

We regret to inform you that ANPI Business, LLC will be discontinuing all <u>residential</u> long distance services (including such services provided to small businesses). As a result, your ANPI Business, LLC service(s), including intrastate, interstate and international long distance services, will be discontinued on or after June 1, 2017, subject to regulatory approval.

Please take action in selecting a new carrier as soon as possible to avoid any interruption of your long distance service. We urge you not to delay in arranging for a new long distance service provider, as some providers may require several days or weeks to initiate new services. To help avoid any lapses in service, please check carefully that all long distance services you currently receive from ANPI Business, LLC, along with any toll free numbers that are assigned to you, are moved to your new provider. If you are not certain of your options for obtaining replacement pre-subscribed long distance service, you should contact your local telephone service provider and ask which carriers are accepting pre-subscribed customers. You may also contact any of the service companies that provide service in your area. An Internet search for "long distance telephone service provider" in your area should provide you with several alternatives.

Please be aware that you are responsible for paying for all services provided to you by ANPI Business, LLC during the transition. You may be subject to suspension or termination of your long distance service in accordance with applicable contracts, tariffs, and rules if you fail to pay your long distance bills. So that we stop sending you invoices, please let us know as soon as you have switched to a new long distance provider by sending an email to <u>care@voyant.com</u>.

The Federal Communications Commission ("FCC") permits customers to object to discontinuance of their service by a telecommunications provider. As provided in the FCC's rule 47 CFR 63.71:

"The FCC 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. 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 ANPI Business LLC. Comments should include specific information about the impact of this proposed discontinuance upon you, including any inability to acquire reasonable substitute service."

ANPI Business, LLC is pleased to have had the opportunity to serve you, and remains committed to making your long distance service transition as smooth as possible. If you have any questions regarding our discontinuance of long distance services, please contact Customer Service at 1-800-262-9043.

Sincerely yours, ANPI Business, LLC Customer Service

VERIFICATION

I, Scott Sawyer, state that I am General Counsel and Secretary of ANPI Business, LLC; that I am authorized to make this Verification on behalf of ANPI Business, LLC; that I have read the foregoing filing and know the contents thereof; and that the same are true and correct to the best of my knowledge, information and belief and are made in good faith.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd day of March, 2017.

ANPI Business, LLC

DocuSigned by: Scott Sawyer 5E1AFB29AAB64A8...

By: Scott Sawyer Title: General Counsel and Secretary