



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

July 30, 2019
Via Web Filing

Mr. Mark Johnson, Executive Secretary
Washington Utilities & Transportation Comm.
621 Woodland Square Loop
Lacey, WA 98503

RE: Talk America Services, LLC; Discontinuance of Service

Dear Mr. Johnson:

Pursuant to WAC 480-120-083, this letter is submitted on behalf of Talk America Services, LLC ("Talk America Services" or "Company") to notify the Commission of the Company's intent to discontinue services to all customers in Washington. Talk America was issued a Registration as a Competitive Telecommunications Company on October 28, 2014 in Docket No. UT-143626. The Company does not seek to relinquish its operating authority, but only to discontinue service to all customers, as described more fully herein.

Talk America Services intends to discontinue the provision of local exchange, digital subscriber line ("DSL") internet access and intrastate and interstate long-distance services to all customers in Washington on or about September 1, 2019, pending applicable regulatory approvals. The services are being discontinued because Talk America Services relies exclusively on an underlying provider to provide services and that provider has notified Talk America Services that it will no longer provide or support these services. Consequently, Talk America Services must discontinue service to the affected customers. Talk America Services provided the attached notice of the proposed discontinuance to the affected customers via 1st class U.S. mail on July 15, 2019. The Company has established a dedicated toll-free customer service number to assist customers in transitioning their service to other providers.

The affected customers are in locations where CenturyLink serves as the underlying incumbent local exchange carrier. CenturyLink offers voice and data services comparable to those provided by Talk America Services. Accordingly, the customers will be able to continue to receive uninterrupted telephone service by switching to CenturyLink or other alternatives prior to Talk America Services' discontinuance date.

Pursuant to WAC 480-120-083 (3), Talk America Services provides the following information:

1. Name of Telecommunications Company: Talk America Services, LLC is located at: 10802 Executive Center Drive, Benton Building Suite 300, Little Rock, AR 72211.
2. Date of Planned Service Discontinuance: Talk America Services will discontinue the provision of services described above on or after September 1, 2019 pending regulatory approvals.

Received
 Records Management
 07/30/19 10:43
 State Of WASH.
 UTIL. AND TRANSP.
 COMMISSION

3. Number of impacted Customers and Their Location (described by exchange or by city and county): Service will be discontinued to sixteen (16) customers, including eleven (11) local and five long-distance only customers. The affected customers are located in Anatone, Centralia, Clarkston, Kent, Lynden, Seattle, Spokane, Vancouver and Yakima.
4. Customer Notice: A copy of the customer notice is attached hereto. If any affected customers remain on the Company's service, a second notice will be provided between 10 and 30 days before cessation of the service by calling the customer(s) directly, in accordance with the provisions of WAC 480-120-083 (4)(d)(i).
5. Notice to State 911 program: This letter is being sent to the State E911 Coordinator to satisfy the requirement of WAC 480-120-083 (2)(b).
6. Notice to Incumbent Local Exchange Carriers ("ILECs"): Not applicable. The Company is a reseller with respect to the affected services and does not purchase unbundled network elements from any ILEC.
7. Notice to Companies Providing Resold Services: Talk America Services' wholesale provider has notified the Company of its intention to discontinue the provision of the underlying services that are used to serve the Company's existing Washington customer base. The underlying provider is therefore aware of the discontinuance and additional notice is not required.
8. Notice to the National Number Administrator: Not applicable. As a reseller, Talk America Services is not assigned numbers directly. Its underlying wholesale provider will be responsible for coordinating with the National Number Administrator regarding the release of telephone numbers.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant to Talk America Services, LLC

cc: State E911 Coordinator (via email to e911leadership@mil.wa.gov)
tms: WAX1701



2134 W Laburnum Ave.
Richmond, VA 23227

July 15, 2019

Customer Name
Customer Address
City, State Zip

URGENT: Your telephone services will be impacted unless you take action!

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the states of Alabama, Arkansas, Idaho, Missouri, Nebraska, New Mexico, North Dakota, South Carolina, Washington, and Wyoming on or after September 1, 2019, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for selecting an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers before September 1, 2019. Therefore, you will need to migrate the services you now receive from Talk America Services to an alternative provider **before September 1, 2019.**

A filing is being made with the FCC for approval of this discontinuance of service. 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 Talk America 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.

You may contact Talk America Services directly to obtain information about this discontinuance, including how to receive a refund on any unused service or how to contact regulatory agencies to obtain information on possible replacement providers. Talk America Services' customer service can be reached at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,
Talk America Services, LLC