



Karl Tucker
Director
State Government Relations

5055 North Point Parkway
Alpharetta, GA 30022
karl.tucker@verizon.com
(908) 758-0808

October 15, 2020

Via Electronic Filing

Mr. Mark Johnson
Executive Director/Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Notice of Discontinuance of Services of XO Communications Services, LLC

Dear Mr. Johnson:

Pursuant to WAC 480-120-083(2), XO Communications Services, LLC (“XO”) hereby notifies the Washington Utilities and Transportation Commission (“Commission”) of the planned discontinuance of detariffed retail services to its federal, state, and local government agency and educational institution customers in Washington. XO does not offer service to residential customers. The discontinuance will become effective on or after November 30, 2020. A reasonable transition period beyond November 30, 2020 may be permitted for those customers of withdrawn services that have contacted XO prior to November 30, 2020 where XO determines that additional time is needed to establish a replacement service or for complex services that XO determines require additional time to complete the disconnection of all circuits.

XO will continue to offer its wholesale services and to provide non-regulated services in Washington. Accordingly, XO does not plan to cancel its Registration.

The name and address of XO is:

Received
Records Management
10/15/2020 13:16
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

XO Communications Services, LLC
One Verizon Way
Basking Ridge, NJ 07920

The XO contact information is:

Karl Tucker
Director-State Government Relations
5055 North Point Parkway
Alpharetta, GA 30022

XO provides competitive local exchange services (including switched and dedicated access services), intraLATA toll service, and intrastate interexchange telecommunications services within the state of Washington to business customers. XO's predecessor company was authorized to provide service in the state of Washington in Docket No. UT-041511 on December 31, 2004.

The XO services at issue in this Notice overlap or are redundant with those offered over Verizon's networks and platforms; therefore, XO is streamlining its service offerings to maximize efficiencies and to provide enhanced services for customers. XO's customers will have ample opportunity to migrate to alternative providers offering comparable retail services, including the Verizon companies.

The public convenience and necessity will not be negatively impacted as the affected customers, which is approximately six, have access to alternative services from MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services and MCI Communications Services LLC d/b/a Verizon Business Services, as well as the incumbent local exchange carrier and numerous other competitive telecommunications providers authorized to provide services in the state of Washington. The affected customers are located in the counties of King and Spokane.

At any time prior to the discontinuance date, E-911 records will be unlocked as part of the normal porting process for customers who migrate to an alternative provider.

XO expects that customers that migrate to alternative providers (including XO affiliates) will choose to port their existing telephone numbers. Number ports will be implemented through industry-standard processes. XO will retain some or all of the numbering resources assigned to it in order to support the services it will continue to provide after the transaction is fully implemented.

XO has notified all affected customers of the discontinuance of these services and additional notices will be sent in the future. Customers were notified by a letter dated July 31, 2020 sent via U.S. mail. An additional customer notice letter will be sent via U.S. mail in October 2020. A bill message, regarding the discontinuation, was included in July 2020 bills. An email was sent in August 2020 to remind the customers of the discontinuance. XO's account representatives have made outbound calls to advise the customers of the discontinuance of these services. A copy of the July 31, 2020 customer notice letter is attached as Exhibit A.

Please contact me with any questions you may have regarding the discontinuance of these services in Washington.

Respectfully submitted,

/s/Karl Tucker

Karl Tucker

Attachment



Verizon
22001 Loudoun County Parkway
Ashburn, VA 20147

July 31, 2020

Notice of Discontinuance. Selected XO Communications services will be discontinued for Federal, state, and local Government agencies and educational institutions on or after November 30, 2020

You must choose a new service provider for certain XO services by November 30, 2020

Dear Valued Customer,

This is a formal notification to let you know that we're going to discontinue the XO Communications¹ services listed in Attachment A on or after November 30, 2020 ('Discontinuation Date') for Federal, state, and local Government agencies and educational institutions. This is subject to regulatory-agency approvals where required, and contractual obligations. We ask that you review Attachment A to see affected services. To avoid loss of service (and access to 911 emergency services) you must, at the least, select a local service provider at least 10 days before the Discontinuance Date.

Your action is required! You must select a new provider or providers for the affected services that you currently purchase from XO. You must do so as quickly as possible, but in any event do so no later than November 30, 2020, or you may lose your service. You must choose a new service provider for certain XO services by November 30, 2020

¹ XO Communications refers to XO Communications Services, LLC (One Verizon Way, Basking Ridge, NJ 07920) and XO Virginia, LLC (One Verizon Way, Basking Ridge, NJ 07920)



Verizon would be pleased to work with you to transfer any of these services to alternative Verizon solutions, as available. You can also choose to switch your services to other providers; you can find a list of most other local telephone service providers in your local telephone directory. Please remember that customers may choose the provider of their local telephone service. You may select any company that is offering service in your area. Finally, if you no longer want some or all of your current services, please contact us so that those services can be disconnected.

Any deposits or credits held for XO customers that migrate to other carriers, or otherwise close their XO accounts, will be returned to you after being applied to any outstanding account balances, in accordance with XO's standard practices and applicable Commission requirements.

We will waive any early termination charges associated with these services. Any of these services that are subject to automatic-renewal are no longer being automatically-renewed; however, we will continue to provide service until the discontinuance date.

Please be aware that you are responsible for paying your XO bills during this transition. You may be subject to suspension or termination of your phone service in accordance with Public Service Commission rules if you fail to pay charges due for certain services.

If you currently purchase local telephone service (that is, dial tone services) from XO, after selecting a new local telephone provider you should also contact your current long distance provider to ensure that your current long distance calling plan is not changed as a result of your change in your local service. If you do not contact your long distance provider, you may be charged basic rates (non-calling plan rates) for long distance calls.

If you have a preferred carrier freeze on your accounts, contact your new local telephone service provider ('LSP') to arrange for a new preferred carrier freeze, if you wish to have this protection going forward.

Action required

We urge you to migrate applications that use the services listed in Attachment A to alternate Verizon services, as available.

Verizon would like to remain your preferred telecommunications service provider. To assist with the transition of your XO services, we currently offer attractive pricing on a number of Verizon solutions to continue to support your needs.

Customers have the right to choose an alternative carrier and customers subscribed to long distance (toll) calling plans with a different in-state or interstate toll provider may lose those plans when the customer selects a new local exchange carrier and may revert to higher-priced non-calling plan rates. The warning is to advise you that to ensure continued subscription to any toll calling plans you should call your in-state and interstate toll providers.

Please note that only the XO Communications services listed in Attachment A are affected by the changes in this notice. For other XO Communications services, customers have been notified separately about changes in service.



Contact us

If you have an assigned sales representative, Client Service Manager ('CSM') or authorized Verizon partner, they will work with you to assist you with this transition. Federal customers can contact your Contracts Manager. You can also reach out to us on 800.296.7595 for more information.

You will be responsible for payment of all XO services received during migration of services. A final bill will be issued with appropriate debits and credits applied, e.g., refunds for any applicable deposits.

We value your business and look forward to helping you realize the benefits that our next generation solutions and network transformation services can unlock for you. Please forward this next-generation letter today to other members of your organization as necessary.

Best Regards,

Verizon Support Team
On behalf of XO Communications, a Verizon company

Important notes for customers in Pennsylvania: The XO services listed in this notice will be discontinued on or after November 30, 2020 ("Discontinuation Date") and to avoid loss of service (and access to 911 emergency services) you must, at the least, select a local service provider at least 10 days before the Discontinuance Date.



Attachment A

Below is a list of the XO Communications services, all of which are being discontinued on or after November 30, 2020, for Federal, state, and local Government agencies and educational institutions. These changes are subject to regulatory-agency approvals, where required.

A brief description of the service and other names by which you may recognize the service are also included below. Please review this list carefully and contact us if you have any questions or require additional information. Your service descriptions can be found in the Product Charges section of your invoice. You can also login to the MyXO portal at <https://portal.xo.com> to view your XO services, invoices and billing information using the menus on the left-hand side.

Please note that the only XO services that are affected are those listed in this notice. If your XO services are not described in this notice, you do not need to take any action.

XO Service	Other Names of Service	Description
<p>1. Integrated Services Digital Network (ISDN)-Primary Rate Interface (PRI)</p>	<p>Inbound PRI; Local ISDN-PRI</p>	<p>ISDN is a standard, all digital technology that allows simultaneous, integrated voice and data capability over two wire digital loops and four wire digital trunks. PRI is the digital trunking interface using ISDN technology that provides high capacity digital access between the XO central office and ISDN compatible CPE located at the customer premises. The connection is provided through standard T-1 point to point private line facilities.</p> <p>Includes Emergency Redundant Routing (ERR) which automatically reroutes your incoming calls away from overloaded trunks and outage locations, and Private Switch/Automatic Location Identification (PS/ALI) which allows a customer with a PBX to provide the specific location of each extension or station to the PS/ALI database manager. The PS/ALI database manager will then update the appropriate 911 database, thereby helping to improve emergency response time</p>
<p>2. Remote Call Forwarding (RCF)</p>	<p>RCF</p>	<p>A local service offering that allows incoming calls to be forwarded to a telephone number in another location</p>
<p>3. Contact Center on Demand (CCoD)</p>	<p>None</p>	<p>CCoD is a hosted contact center service providing call center personnel with automated call distribution, intelligent call routing and desktop ACD and SIP phone software</p>



XO Service	Other Names of Service	Description
<p>4. XO Basic Business Lines</p>	<p>Advanced Business Line; Basic Line; Enhanced Business Line; Full Service Business Line; Foreign Exchange Line; Remote Call Forward; Small Business Basic Business Local Line Service I & II; Small Business Basic Business Multi-Line Service I & II; Business Service Basic Business Line I & II; Business Services Basic Business Local Line Service; Business Services Basic Business Multi-Line Service</p>	<p>XO Basic Business Lines, often called Plain Old Telephone Service (POTS) lines, provide basic access service and supply a single voice-grade communication channel for single line telephones, key telephone systems, modems and other devices that need to access the Public Switched Telephone Network (PSTN)</p>
<p>5. Voice over Internet Protocol (VoIP) Origination</p> <p>Note: only XO VOIP Origination service is affected by this notice, not Enterprise SIP (ESIP), Hosted PBX or IP Flex</p>	<p>None</p>	<p>With VoIP Origination services, customers receive local telephone calls from multiple markets without having to maintain a physical presence in those markets</p>
<p>6. XO Session Initiation Protocol (SIP) Trunking</p> <p>Note: This does not apply to XO Enterprise SIP (ESIP), Hosted PBX or IP Flex</p>	<p>None</p>	<p>SIP trunks combine voice, data and Internet traffic over a single IP connection to a single location using the customer IP-PBX</p>
<p>7. TDM bundled products</p>	<p>XOptions; Digital PBX Bundled Package; Integrated Access; PRI Bundled Package 1 & 2; True Business Total Communications (TBTC); Total Communications (TC); True Business (TB)</p>	<p>XOptions combines local, long distance, Internet, and Web hosting services, through one provider, through various XOptions packages. XOptions Flex is not included in this decommission</p> <p>PRI Bundle is an ISDN-PRI Service that includes Local Loop, PRI Interface and 24 channels. XO Integrated Access combines voice (local and long distance) and Internet access on a single facility</p> <p>Digital PBX Package includes the Local Loop, 24 trunks, Federal Subscriber Line Charge (FSLC), and Local Number Portability (LNP) charges</p> <p>TBTC combines voice (local and long distance) and Internet access on a single facility. The base package includes 6 voice lines, 512 kb high-speed Internet access, up to 6 custom calling features, customer premise equipment (CPE), plus a choice of Long Distance minute buckets</p> <p>Total Communications (TC) combines voice lines and Internet access on a single facility. The Speeds Capacity = 6 - 20 lines, 256k, 384k, 512k, 768k, 1024M internet access</p> <p>True Business (TB) combines voice lines and local and intra LATA usage into one flat rate</p>



XO Service	Other Names of Service	Description
8. XO Business Trunks	Analog Trunk; Digital Trunk; Combination Trunk; Inbound Trunk; Two Way Trunk; Dedicated LD, Direct Access Line; Full Switched; Fractional Switched; Digital T-1; Full Digital Switched T-1; Local Analog PBX Trunk Service; Local Digital PBX Trunk Service; Local Trunk - Basic PBX Analog Trunk; Private Branch Exchange (PBX) Trunks	XO Business Trunks connect a customer's PBX or key system to the XO central office to deliver PSTN access. Trunks offer a 'shared access' meaning that a number of phone lines can be consolidated on each trunk. Trunks can be analog or digital and carry inbound or outbound traffic or two-way
9. XO Conferencing	Conference Calling – Audio; WebEx	XO Conferencing product provides the means for customers to conduct calls with two or more parties. Customers may opt for standard or toll free dial in, both available as operator attended or unattended
10. Hosted Security	SRA; DMZ; WCF; Fault Tolerant	Provides customers with dedicated MPLS and/or Internet services with a managed network-based firewall
11. XO Centrex	None	XO Centrex is a business telephone system offered from the local XO central office on a subscription basis. It delivers a set of PBX like features to individual desks with internal and PSTN access for the features, functions and applications that a business customer needs
12. Digital Subscriber Line (DSL)	ADSL; IDSL; SDSL	DSL provides an asymmetrical and symmetrical connection over a standard telephone line at speeds up to 140 times faster than 56k dial-up
13. Site Security	ASA; FWL; VPN; managed security	Provides customers with dedicated MPLS and/or Internet services with a Managed premises-based firewall
14. Broadband Internet	Broadband	Broadband internet connectivity. Includes third-party resold internet access
15. ISDN Basic Rate Interface (BRI)	None	ISDN BRI provides both voice and data capabilities via two 64 Kbps B channels, and one D channel used for signaling. The B channels can be used for voice but are more commonly used for data purposes such as video conferencing, voice/data transmission from remote offices to headquarters, or connection to an Internet Service Provider (ISP)
16. DDoS Mitigation	None	Helps protect critical network operations and infrastructure against costly downtime from DDoS and Volumetric attacks



XO Service	Other Names of Service	Description
17. Long Distance and toll-free services offered as standalone services or in association with ISDN PRI, Business Lines, TDM Integrated Access, TBTC, XOptions, Business Trunks, Centrex, ISDN-BRI, VoIP Origination, and XO Session Initiation Protocol (SIP) Trunking	None	The following plans provide inter-state voice and VoIP communications, either inbound or outbound, and allow customers to make national and international long distance calls ¹ : 9.9 LD/TFS (Across America 1+ Plan), Across America 1+ Plans, Business Saver 5.9 LD/TFS (Across America 1+ Plan), Business Value 6.9 LD/TFS (Across America 1+ Plan), National Local Private Line Service Calling Plan, Small Business 7.9 LD/TFS (Across America 1+ Plan), Switched Long Distance Product, True Savings Long Distance Rate Plan, ``Uni-Rate InterLATA Long Distance Service, Unity LD Plan, XO Corporate Long Distance Plan, XO Dedicated Long Distance Calling Plan, XO Gold and Platinum Services, XO Long Distance Business Plan, XO Unlimited Business Plan, XOption Service Offering (inbound and outbound long distance for XOptions), Toll Free Service and standalone XO Employee Long Distance Service, CLDT (Carrier Long Distance Termination), VOIP Termination; Legacy Allegiance International Long Distance Plan; XO Global International Long Distance Plan (including International Toll-Free Service/Universal International Freephone Number)
18. MultiTransport Networking Service (MTNS)	None	XO's MTNS is a data networking service that supports traditional private data networking services, such as Frame Relay and Ethernet, over an IP backbone
19. Managed Modems Services	Managed Modems; PMN Services; Modem Terminations	The hosting, monitoring and management of modem termination facilities, enabling client's end user devices to communicate with client hosts over the PSTN

¹ Customers may also have entered into individually negotiated arrangements for long distance service outside of the named plans.

Address Information

The address to which the accompanying letter was sent is your Address of Record for your account. Any additional notices, including notices about changes to your account, will be sent to this address unless you indicate otherwise. If you need to provide us with a different Address of Record, please update your details on the MyXO portal at <https://portal.xo.com>. You can also update your Address of Record by contacting your sales representative, Client Service Manager ('CSM'), or Contracts Manager, or by calling 800.296.7595.

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