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**UT-240958**  
Received  
Records Management  
Dec 18, 2024  
Telephone: (770) 232-9200  
Facsimile: (770) 232-9208

December 18, 2024

**VIA Electronic Filing**

Jeff Killip, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Sq. Loop S.E.  
Lacey, Washington 98503

Re: Network Innovations, LLC; Discontinuance of Service

To Mr. Killip,

In accordance with Washington Administrative Code 480-1420-083, Network Innovations, LLC (“Network Innovations” or the “Company”) hereby notifies the Washington Utilities and Transportation Commission (“Commission”) of the planned discontinuance of its legacy resold analog voice services (*i.e.*, Plain Old Telephone Services, or “POTS”) (the “Services”) on or after February 14, 2025. Network Innovations was issued a Registration as a Competitive Telecommunications Company on March 20, 2008, in Docket No. UT-080316. The Company also currently provides interstate telecommunications services as a competitive carrier pursuant to blanket Section 214 authority granted pursuant to Section 63.01 of the Federal Communications Commission’s Rules. Network Innovations will continue to provide regulated services in Washington and is not seeking to relinquish its operating authority.

Network Innovations provides POTS services to one (1) business customer. The affected customer is located in the City of Orting in Pierce County. The company has sent, and will continue to send, written communication to this affected customer, advising them of the planned

discontinuance and of their need to select alternative providers. The customer received written communication via electronic mail, a copy of which is attached hereto as **Exhibit 1**. An additional notice will be sent at least ten days prior to cessation of service pursuant to the provisions of WAC 480-120-083(4)(d)(ii). A copy of the application for authority pursuant to Section 214 of the Communications Act of 1394, as amended, to Discontinue Service filed with the Federal Communications Commission, is attached hereto as **Exhibit 2**.

This letter is being sent to the State E911 Coordinator to satisfy the requirement of WAC 480-120-083(2)(b). The requirement to notify Incumbent Local Exchange Carriers (“ILECs”) does not apply because Network Innovations acts as a reseller for the impacted services and does not acquire unbundled network elements from any ILEC. The requirement to notify the National Number Administrator is also not applicable. As a reseller, Network Innovations is not assigned numbers directly. Network Innovations will send a notice to its suppliers to meet and satisfy the requirements of WAC 480-120-083(2)(e) and (6).

To conclude, Network Innovations wishes to discontinue its POTS services on February 14, 2025. Advance notice will be provided to the sole affected customer to allow them adequate time to set up alternative services that are readily available from alternative providers.

If you have any questions, or if we can provide you with any additional information, please contact our office at (770) 232-9200 or [info@telecomcounsel.com](mailto:info@telecomcounsel.com).

Respectfully submitted,

Network Innovations, LLC



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Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
Email: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

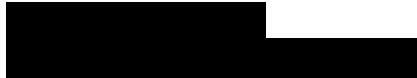
Its Counsel

**Exhibit 1**

**Copy of Customer Notice**



12.16.2024



**IMPORTANT NOTICE REGARDING THE PLANNED DISCONTINUANCE OF ANALOG VOICE SERVICES PROVIDED BY NITEL**

Dear Valued Customer,

Network Innovations, LLC d/b/a Nitel, located at 350 N. Orleans Street, Suite 1300N, Chicago, Illinois 60654, plans to discontinue all of its existing legacy analog voice services (*i.e.*, traditional Plain Old Telephone Services, also known as “POTS”) in the states of Illinois, Indiana, Massachusetts, New York, and Washington on **February 14, 2025**, or as soon thereafter as authorized by the Federal Communications Commission (FCC) and all applicable state regulatory commissions, if required.

If you want to maintain analog voice services after February 14, 2025, please contact a new provider of your choice before February 14, 2025, to ensure no disruption to your service. If you do not take action by February 14, 2025, or upon regulatory approval, you will no longer have analog voice services.

When your analog voice services are discontinued, we will automatically apply any applicable deposits or credits to your Nitel bill. If the amount of the bill is less than any deposits and credits, we will issue a refund for the remaining balance.

For Indiana customers, if you have concerns, you may contact the Indiana Utility Regulatory Commission and Utility Consumer Counselor at 1-888-441-2494 or by mail at 115 W. Washington Street, Suite 1500 South, Indianapolis, IN 46204.

If you have questions or need assistance finding a new service provider, please contact us at 708-669-4020.

Nitel appreciates your patronage and apologizes for any inconvenience this transition causes. Please accept our sincere thanks and best wishes.

**The following statement is required by the FCC:**

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 Network Innovations, LLC d/b/a Nitel. 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.

**Exhibit 2**

**Copy of FCC Discontinuance Application**

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
)  
Section 63.71 Application of )  
) WC Docket No. 24-\_\_\_\_\_  
**Network Innovations, LLC d/b/a Nitel** )  
)  
For Authority Pursuant to Section 214 )  
of the Communications Act of 1934, as )  
amended, to Discontinue Service )

**SECTION 63.71 APPLICATION**

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 63.71, Network Innovations, LLC d/b/a Nitel (“Nitel”) applies for authority to discontinue offering legacy analog voice services (*i.e.*, Plain Old Telephone Services, or “POTS”) (the “Services”), all of which Nitel provides on a resold basis, to all of its customers in the states of Illinois, Indiana, Massachusetts, New York, and Washington.<sup>1</sup> This discontinuance will affect only 21 access lines serving 8 customers.

As required by section 63.71(a) and (c) of the Commission’s rules, Nitel provides the following information:

**1. Name and Address of Carrier:**

Network Innovations, LLC  
350 N. Orleans Street  
Suite 1300N  
Chicago, Illinois 60654

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<sup>1</sup> Nitel only provides POTS in these five states and provides no other domestic telecommunications services. Accordingly, upon discontinuing the Services specified in this Application, Nitel will no longer provide any telecommunications services subject to Section 214 of the Communications Act of 1934, as amended.



**2. Date of Planned Discontinuance of Service:**

Nitel plans to discontinue the Services to all customers in the states noted below on or about February 14, 2025, or as soon thereafter as any necessary regulatory approvals are obtained.

**3. Points of Geographic Areas of Service Affected:**

Nitel proposes to discontinue the Services in the states of Illinois, Indiana, Massachusetts, New York, and Washington, which are the only states where Nitel provides the Services.

**4. Brief Description of Type of Service Affected:**

Nitel proposes to discontinue the provision of legacy analog voice services (*i.e.*, Plain Old Telephone Service, or “POTS”), all of which are provided on a resold basis.

**5. Brief Description of the Dates and Methods of Notice to all Affected Customers:**

Nitel provided discontinuance notifications to its affected customers via email on December 16, 2024, in compliance with the requirements of Section 63.71(a) and (b) of the Commission’s rules. A copy of the written notification provided to all affected customers is attached as Attachment A.

**6. Regulatory Classification of Carrier:**

Nitel is considered non-dominant with respect to the Services to be discontinued.

**7. Notice to Federal and State Officials:**

In accordance with Section 63.71 of the Commission’s rules, a copy of this Application is being mailed concurrently to the entities listed on the attached certificate of service.

The public convenience and necessity will not be adversely affected by Nitel's discontinuance of the services described herein. Advance notice has been provided to all affected customers, giving them ample time to arrange substitute services, which are readily available from other providers. Therefore, Nitel respectfully requests that the Commission approve this Section 63.71 Application to discontinue service.

Respectfully submitted,

**NETWORK INNOVATIONS, LLC**  
**d/b/a NITEL**

By:  \_\_\_\_\_

Lisa Taranto  
Chief Accounting Officer  
350 N. Orleans Street #1300N  
Chicago, IL 60654  
(773) 364-3199  
[ltaranto@nitelusa.com](mailto:ltaranto@nitelusa.com)

December 16, 2024

**ATTACHMENT A**  
**CUSTOMER NOTICE**

[REDACTED]

**From:** ARNitel <ARNitel@nitelusa.com>  
**Sent:** Monday, December 16, 2024 2:01 PM  
**To:** [REDACTED]  
**Cc:** Lisa Taranto  
**Subject:** IMPORTANT NOTICE REGARDING THE PLANNED DISCONTINUANCE OF ANALOG VOICE SERVICES PROVIDED BY NITEL  
**Attachments:** [REDACTED] - Section 63.71 Consumer Notice.pdf

12.16.2024

[REDACTED]  
[REDACTED]

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When your analog voice services are discontinued, we will automatically apply any applicable deposits or credits to your Nitel bill. If the amount of the bill is less than any deposits and credits, we will issue a refund for the remaining balance.

For Indiana customers, if you have concerns, you may contact the Indiana Utility Regulatory Commission and Utility Consumer Counselor at 1-888-441-2494 or by mail at 115 W. Washington Street, Suite 1500 South, Indianapolis, IN 46204.

If you have questions or need assistance finding a new service provider, please contact us at 708-669-4020.

Nitel appreciates your patronage and apologizes for any inconvenience this transition causes. Please accept our sincere thanks and best wishes.

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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 Network Innovations, LLC d/b/a Nitel. 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.



**nitel**

12.16.2024



**IMPORTANT NOTICE REGARDING THE PLANNED DISCONTINUANCE OF ANALOG VOICE SERVICES PROVIDED BY NITEL**

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**CERTIFICATE OF SERVICE**

I, Rachel Hungate, do hereby certify that the foregoing Section 63.71 Application was served this 16th day of December, 2024, by mailing true and correct copies thereof, postage prepaid, first class mail, to the following persons at the addresses listed below.

Secretary of Defense  
Attn: Special Assistant for Telecommunications  
Pentagon  
Washington, DC 20301

Illinois Commerce Commission  
Michael A. Bilandic Building  
160 North LaSalle Street, Suite C-800  
Chicago, IL 60601

Office of the Governor  
State of Illinois  
207 State House  
Springfield, IL 62706

Indiana Utility Regulatory Commission  
PNC Center  
101 W. Washington Street, Suite 1500E  
Indianapolis, IN 46204

Office of the Governor  
State of Indiana  
200 W. Washington Street, Room 206  
Indianapolis, IN 46204

Massachusetts Department of  
Telecommunications & Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118


Office of the Governor  
Commonwealth of Massachusetts  
Massachusetts State House, Room 280  
Boston, MA 02133

New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Office of the Governor  
State of New York  
NYS State Capitol Building  
Albany, NY 12224

Washington Utilities and  
Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Office of the Governor  
State of Washington  
P.O. Box 40002  
Olympia, WA 98504-0002

  
Rachel Hungate