



*Tim,
RC? Records Center?
Jury.*

TELECOM

July 12, 2019

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

2019 JUL 18 PM 3:27

2019 JUL 18 PM 3:27

3700 Monte Villa Pkwy, Suite 110 Bothell, WA 98021 425.576.8200 gowave.com

Dear Mr. Johnson:

As required by 47 C.F.R. § 63.71, we write to notify you that Wave Broadband ("Wave") intends to discontinue the provision of certain VoIP services in the state of Washington. Accordingly, we have filed an application to discontinue the specific service described below with the Federal Communications Commission.

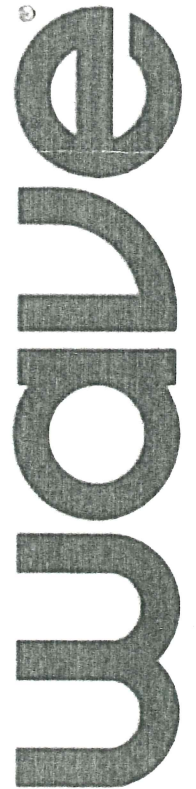
Wave serves a very small number of subscribers via a legacy platform that Wave acquired following its acquisition of another provider. The total number of customers served by the legacy platform at this time is 60 subscribers. Because the number of subscribers under this legacy platform are de minimis, the impact of this discontinuance on the public will be minimal.

To ensure that these customers continue to have access to voice services, Wave intends to offer a functionally equivalent (or better) VoIP service delivered over a different platform (also owned by Wave) to these customers on similar terms of service. As a result, Wave expects that the vast majority of these 60 customers will choose to migrate to the new platform, and continue to receive high-quality voice service. However, should those subscribers choose not to convert to Wave's VoIP platform, other entities in Washington provide voice services in the affected service area comparable to that service currently used by these customers. Existing voice service providers in the affected service area include many small carriers and large national carriers such as CenturyLink, Frontier and Vonage.

Please let us know if you have any additional questions regarding this discontinuance.

Sincerely,

Wave





July 12, 2019

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

2019 JUL 18 PM 3:27
425.576.8200
gowave.com

Dear Mr. Johnson:

As required by 47 C.F.R. § 63.71, we write to notify you that Wave Broadband ("Wave") intends to discontinue the provision of certain VoIP services in the state of Washington. Accordingly, we have filed an application to discontinue the specific service described below with the Federal Communications Commission.

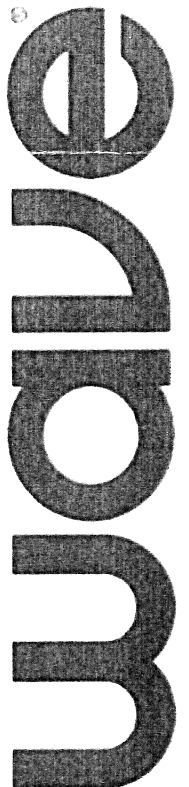
Wave serves a very small number of subscribers via a legacy platform that Wave acquired following its acquisition of another provider. The total number of customers served by the legacy platform at this time is 60 subscribers. Because the number of subscribers under this legacy platform are de minimis, the impact of this discontinuance on the public will be minimal.

To ensure that these customers continue to have access to voice services, Wave intends to offer a functionally equivalent (or better) VoIP service delivered over a different platform (also owned by Wave) to these customers on similar terms of service. As a result, Wave expects that the vast majority of these 60 customers will choose to migrate to the new platform, and continue to receive high-quality voice service. However, should those subscribers choose not to convert to Wave's VoIP platform, other entities in Washington provide voice services in the affected service area comparable to that service currently used by these customers. Existing voice service providers in the affected service area include many small carriers and large national carriers such as CenturyLink, Frontier and Vonage.

Please let us know if you have any additional questions regarding this discontinuance.

Sincerely,

Wave



3700 Monte Villa Pkwy, Suite 110 Bothell, WA 98021 425.576.8200 gowave.com

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of Section 63.71 Application of)
Wave Broadband, LLC for Authority) WC Docket No. _____
Pursuant to Section 214 of The)
Communications Act of 1934, as amended, to)
Discontinue the Provision of Voice Over)
Internet Protocol Service in Seattle,)
Washington)

SECTION 63.71 APPLICATION

Wave Broadband, LLC (“Wave”) hereby seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, to discontinue the provision of certain VoIP services (“Discontinued Services”) on or before August 5, 2019 in the state of Washington.

Wave serves a very small number of subscribers via a legacy platform that Wave acquired following its acquisition of another provider. The total number of customers served by the legacy platform at this time is 60 subscribers. Because the number of subscribers under this legacy platform are *de minimis*, the impact of this discontinuance on the public will be minimal.

To ensure that these customers continue to have access to voice services, Wave intends to offer a functionally equivalent (or better) VoIP service delivered over a different platform (also owned by Wave) to these customers on similar terms of service. As a result, Wave expects that the vast majority of these 60 customers will choose to migrate to the new platform, and continue to receive high-quality voice service. However, should those subscribers choose not to convert to Wave’s VoIP platform, other entities in Washington provide voice services in the affected service area comparable to that service currently used by these customers. Existing voice service

providers in the affected service area include many small carriers and large national carriers such as CenturyLink, Frontier and Vonage.

Wave provides the following information pursuant to Section 63.71 of the Commission's rules:

I. Information Required by 47 C.F.R. § 63.71(a)(1) – (a)(4)

1. Name and Address of Carrier

Wave Broadband, LLC
3700 Monte Villa Pkwy, Suite 110
Bothell, WA 98021

2. Date of Planned Service Discontinuance

Wave plans to discontinue the services that are the subject of this Application on or after August 5, 2019.

3. Points of Geographic Areas of Service Affected

Wave proposes to terminate the Discontinued Services for a small number of subscribers living in multi-dwelling units in Seattle, Washington. There will be 60 subscribers affected by the discontinuance.

4. Description of Type of Service Affected

The Discontinued Services consist of interconnected VoIP services that Wave provides through a legacy platform acquired from a prior transaction.

II. Notice to Subscribers

In accordance with 47 C.F.R. §§ 63.71(a) and applicable state law, Wave notified all affected subscribers of the planned discontinuance of the Discontinued Services. Specifically, Wave sent letters via first class U.S. Mail to each of the affected subscribers on July 1, 2019, a sample, redacted copy of which is attached hereto. For subscribers who have consented to

receive notices electronically, Wave also sent an email message regarding the discontinuance on July 3, 2019, a sample, redacted copy of which is attached hereto.¹ In the notice, Wave provided its planned date of discontinuance and notice of the availability of alternative service providers. These notices included all the information required by 47 C.F.R. §§ 63.71(a)(1) – (a)(4) as well as the statement applicable to non-dominant carriers set forth in 47 C.F.R. § 63.71(a)(5)(i).

III. Notice to the States and the Dept. of Defense

In accordance with 47 C.F.R. 63.71(a), Wave mailed a copy of this Application to the Governor of Washington, the Washington Utilities and Transportation Commission, and the Secretary of Defense.

IV. Non-Dominant Status

Wave is a non-dominant carrier in the local and interexchange service markets in these areas.

V. Designated Contacts

Correspondence concerning this Application should be directed to:

K.C. Halm
Katori Copeland
Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, NW, Suite 800
Washington, DC 20006
(202) 973-4287
KCHalm@dwt.com

(202) 973-4285
KatoriCopeland@dwt.com

¹ As a courtesy, Wave notified end users that may be using this service but are not currently paying for the service. Wave does not have any contact information for these end users, other than the telephone number on file. Absent specific guidance on obligations to the company's non-paying end users, Wave has developed a plan to reach these end users via direct contact to the telephone number of record. Wave began contacting these end users on July 3, 2019.

WHEREFORE, Wave respectfully requests that the Commission authorize the discontinuance of the VoIP services described herein on or before August 5, 2019, or 31 days after the Commission release public notice of this filing, whichever date is earlier.

Respectfully Submitted:

WAVE BROADBAND, LLC



By: K.C. Halm
Katori Copeland
Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, NW, Suite 800
Washington, DC 20006
Telephone: (202) 973-4287
Facsimile: (202) 973-4499

Counsel for Wave Broadband, LLC

Dated: July 12, 2019

cc: Gov. Jay Inslee, Governor of Washington
Washington Utilities and Transportation Commission

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



IMPORTANT NOTICE: Changes to your Wave G phone service

July 1, 2019

Dear «First_name»,

The VoIP phone service previously provided by CondoInternet, now Wave G, in Seattle, WA, requires upgrades to enable us to support you as a customer and deliver standard phone features.

We will be shutting down current phone system equipment on August 5, 2019. In order to ensure your phone service continues to operate properly, new equipment must be installed in your home before August 5, 2019.

Following the upgrade, you will be able to keep your phone number; however, your monthly rate will change to be consistent with the new service, increasing to \$20/month, plus taxes and fees.

The upgraded Wave G phone service will provide a crystal-clear connection and unlimited calling throughout the U.S. and Canada. Plus, you'll receive enhanced voicemail, call waiting, caller ID, Nomorobo compatibility, and the Wave Cloud Phone app, which enables you to use your home phone number with any smartphone or tablet connected to the internet.

Keeping your service and phone number will require a brief in-home appointment to install the required equipment. **Please contact our care team at 1-844-779-2834 to schedule your installation appointment.**

If you do not wish to keep your service or phone number, no action is required and **your service will be disconnected on August 5, 2019.**

You may also choose to port your number to an alternative provider. A list of alternate service providers may be found online or in the front of your local telephone directory.

Please note: 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 Wave Broadband, 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.

Thank you for being a Wave customer.

Sincerely,

Wave

3700 Monte Villa Pkwy, Suite 110 Bothell, WA 98021 425.576.8200 gowave.com

From: customerservice@wavebroadband.com <customerservice@wavebroadband.com>

Sent: Monday, July 1, 2019 8:54 AM

To: [REDACTED]

Subject: IMPORTANT NOTICE: Changes to your Wave G phone service

[View it in your browser.](#)

wave G

IMPORTANT NOTICE

Dear [REDACTED]

The VoIP phone service previously provided by CondoInternet, now Wave G, in Seattle, WA, requires upgrades to enable us to support you as a customer and deliver standard phone features:

We will be shutting down current phone system equipment on August 5, 2019. In order to ensure your phone service continues to operate properly, new equipment must be installed in your home before August 5, 2019.

Following the upgrade, you will be able to keep your phone number; however, your monthly rate will change to be consistent with the new service, increasing to \$20/month, plus taxes and fees.

The upgraded Wave G phone service will provide a crystal-clear connection and unlimited calling throughout the U.S. and Canada. Plus, you'll receive enhanced voicemail, call waiting, caller ID, Nomorobo compatibility, and the Wave Cloud Phone app, which enables you to use your home phone number with any smartphone or tablet connected to the internet.

Keeping your service and phone number will require a brief in-home appointment to install the required equipment. **Please contact our care team at 1-844-779-2834 to schedule your installation appointment.**

If you do not wish to keep your service or phone number, no action is required and **your service will be disconnected on August 5, 2019.**

You may also choose to port your number to an alternative provider. A list of alternate service providers may be found online or in the front of your local telephone directory.

Please note: 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 Wave Broadband, 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.

Thank You,
WAVE CUSTOMER SERVICE TEAM

You are receiving this e-mail as a current subscriber to Wave services.
If you no longer wish to receive these emails, simply UNSUBSCRIBE.

Wave, 401 Parkplace Center, Suite 103 Kirkland, WA 98033
1-866-WAVE-123

© 2019 WaveDivision Holdings, LLC. All Rights Reserved.
Wave® is the property of WaveDivision Holdings, LLC.
All other trademarks are the property of their respective owners.

Copeland, Katori

From: no-reply@fcc.gov
Sent: Friday, July 12, 2019 3:58 PM
To: Copeland, Katori
Subject: FCC ECFS Filing Confirmation

[EXTERNAL]

Thank you for your submission to the FCC Electronic Comment Filing System (ECFS).
Please Note that your filing will not be available for searching until it has been reviewed and posted by the FCC.

Confirmation Number: 2019071235903225

Proceeding(s): INBOX-63.71 : Section 214 Domestic Discontinuance Application

Filer(s): Wave Broadband, LLC

Author(s): K.C. Halm, Katori Copeland

Law firm(s): Davis Wright Tremaine, LLP

Type of Filing: APPLICATION

File Number:

Report Number:

Bureau ID Number:

Documents(s) Attached: Wave Section 63.71 Application (07-12-19).pdf

Address: 1919 Pennsylvania Ave NW Suite 800, Washington, DC 20006