



Sharon Mullin
Director
Regulatory

2003 Point Bluff
Austin, TX 78746

T: 512-330-1698
F: 832-213-0203
Sharon.Mullin@att.com

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VIA ELECTRONIC FILING

Mark Johnson, Executive Director/Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Received
Records Management
06/13/18 15:25
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: AT&T Corp. Notice Pursuant to WAC 480-120-083 of Discontinuance of Lucky Dog Services in Washington

Dear Mr. Johnson:

AT&T Corp. (“AT&T”) provides notification to the Washington Utilities and Transportation Commission (“Commission”) that it plans to discontinue Lucky Dog Phone Co. (“Lucky Dog”) 10-10-345 domestic long-distance dialing services effective June 29, 2018 in compliance with WAC 480-120-083(2)(a). This discontinuance is subject to FCC authorization and will not impact prepaid calling cards and pre-paid minutes provided by AT&T.

Lucky Dog 10-10-345 service allows users to place intrastate and interstate calls by dialing 10-10-345. Upon discontinuance, Washington customers will be able to utilize the traditional AT&T domestic dial around service 10-10-288. Deposits are not associated with this service, so no refunds are necessary.

The public convenience and necessity will not be impaired and AT&T Residential customers in Washington will be minimally impacted by this discontinuance, as there were only 19 total related calls completed in Washington in the past 6 months. AT&T is discontinuing this service nationwide, including in the state of Washington. This service has declined considerably in popularity over the years due to the growth of other communication methods, including mobile phones, text messaging, email and other social media applications. Customers impacted by the discontinuance may contact AT&T Customer Service at the toll-free number on their bill or V/TTY or at AT&T, One AT&T Way, Room 6435, Bedminster NJ 07921.

This discontinuance was prompted in response to the recent notification by the billing service vendor, Business Services Group (“BSG”) that it is terminating its contract for billing services with AT&T effective June 29, 2018. Accordingly, Lucky Dog 10-10-345 domestic calls will be discontinued on June 29, 2018. AT&T requests a waiver of the requirement in WAC 480-120-083(2)(a) to provide notice 30 days prior to discontinuance, as the discontinuance will have limited customer impact as the customer volumes are extremely low, many other options exist

for customers, including other dial around options, and there is no alternative billing solution which AT&T could put into place for Lucky Dog prior to the discontinuance date. AT&T believes that the impact on customers is minimal.

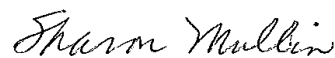
Pursuant to WAC 480-120-083(2)(c), AT&T provided notice to affected customers of its intent to discontinue this service with a direct mailed letter (**Attachment A**) on May 14, 2018 and also on June 8, 2018 (**Attachment B**). AT&T is also providing notice on its Interactive Voice Response Systems (“IVRs”) and public website.¹ Additionally, AT&T filed an Application with the FCC on May 15, 2018 for authority under Section 214(a) of the Communications Act, as amended, 47 U.S.C. § 214, and Section 63.71 of the FCC rules, 47 C.F.R. §63.71, to discontinue Lucky Dog 10-10-345 service. A copy of the Application was sent to the WUTC on April 15, 2018.

AT&T did not need to send the other notices required in subsection (2) as they are not applicable to the domestic long-distance service that is being discontinued. Subsection 2(b) deals with 911 service, and does not apply to Lucky Dog service. Subsection 2(d) and (e) also do not apply to AT&T’s discontinuance of this service. Subsection 2(f) requires notice to the numbering administrator; however, no numbers are to be returned with the discontinuance of this service.

Subsection (3) requires that the notice to the Commission contain certain information. In compliance with that section, AT&T provides the following. The services discussed above are provided in Washington by AT&T Corp. These services, both intrastate and interstate, are being discontinued in Washington on June 29, 2018. With the discontinuance, customers are not losing their local or long distance service or the ability to reach the network to place calls.

If you have any additional questions, please contact me at 512-330-1698.

Sincerely,


Sharon Mullin

cc: Tim Zawislak
Rebecca Beaton

¹ See http://www.serviceguide.att.com/ACS/ext/pcn.cfm?type=TBS_Intra

Attachment A
Customer Notice Sent on May 14, 2018



May 14, 2018

Important service withdrawal notice

In the past, you may have used Lucky Dog Phone Co. for long distance calls by dialing 10-10-345 prior to making your long distance call. AT&T Corp. doing business as Lucky Dog Phone Co. will discontinue this long distance dialing service on or after June 29, 2018 in the United States, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. This is all pending federal and state regulatory approval where it applies.

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 AT&T Corp. d/b/a Lucky Dog Phone Co. 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. AT&T Customer Service can be reached at the toll-free number on your bill or V/TTY at 711. Thank you, AT&T, One AT&T Way, Attention: Calling Card Services, Room 6435, Bedminster, NJ 07921

Thank you, AT&T

Attachment B
Customer Notice Sent on June 8, 2018



June 8, 2018

Important service withdrawal notice

In the past, you may have used Lucky Dog Phone Co. for long distance calls by dialing 10-10-345 prior to making your long distance call. AT&T Corp. doing business as Lucky Dog Phone Co. will discontinue this long distance dialing service on or after June 29, 2018 in the United States, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. This is all pending federal and state regulatory approval where it applies.

AT&T Customer Service can be reached at the toll-free number on your bill or V/TTY at 711. Thank you, AT&T, One AT&T Way, Attention: Calling Card Services, Room 6435, Bedminster, NJ 07921

Thank you, AT&T