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SEP 0 9 2013

**SOUTH DAKOTA PUBLIC** 

Executive Director - Federal Regulatory Affairs



1300 I Street, NW Suite 400 West Washington, DC 20005

(202) 515-2590 (202) 336-7922 (fax)

September 3, 2013

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

> RE: Section 63.71 Application of MCI Communications Services, Inc. d/b/a Verizon Business Services

Dear Ms. Dortch:

MCI Communications Services, Inc. d/b/a Verizon Business Services submits the enclosed Application under Section 214(a) of the Communications Acts and Section 63.71 of the Commission's rules to discontinue interstate private line DS0 service (64 kbps or less). Verizon Business plans to grandfather DS0 Private Line service and to continue to serve existing customers for at least the term of their contracts.

Verizon Business intends to discontinue this service in the 48 contiguous states as well as in Hawaii and the District of Columbia. A copy of the written notification is attached.

Verizon Business is filing an original and five copies of this letter (with attachment) with the Office of the Secretary.

If you have any questions regarding this matter, please contact me at 202-515-2590.

Encl.

cc: Secretary of Defense, Attn: Special Assistant for Telecommunications Public Utilities Commission for Each Impacted State Governor of Each Impacted State

SEP 0 9 2013
UTILITIES COMMISSION

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

In the Matter of	)	
	)	
Section 63.71 Application of	)	
MCI Communications Services, Inc.,	)	
d/b/a Verizon Business Services	)	File no.
	)	
For Authority Pursuant to Section 214 of	)	
the Communications Act of 1934, As	)	
Amended To Discontinue the Provision of	)	
Service	)	

# SECTION 63.71 APPLICATION OF MCI COMMUNICATIONS SERVICES, INC, d/b/a VERIZON BUSINESS SERVICES

MCI Communications Services, Inc., d/b/a Verizon Business Services ("Verizon Business") submits this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to discontinue interstate private line DS0 service (64 kbps or less) ("DS0 Private Line"). Verizon Business plans to grandfather DS0 Private Line and to continue to serve existing customers for at least the term of their contracts.

As Sections 63.71(a) and (b) of the Commission's rules require, Verizon Business provides the following information:

#### 1. Name and Address of Carrier (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

MCI Communications Services, Inc. d/b/a Verizon Business Services One Verizon Way Basking Ridge, NJ 07920

#### 2. Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization, on or after November 4, 2013, Verizon Business will no longer accept new orders for DS0 Private Line. Existing customers may retain their DS0 Private Line service in accordance with their contracts' terms and conditions. Verizon Business

will continue to accept orders for moves, adds, or changes to existing DS0 Private Line service, in accordance with contractual terms and conditions. Verizon Business will continue to provide DS0 Private Line on a month-to-month basis after the expiration of the customers' contracts, until Verizon Business discontinues DS0 Private Line completely or until the customers terminate service. Month-to-month customers initially will be able to submit orders for moves, adds, or changes. At some point after the Commission grants this application, but before Verizon Business discontinues DS0 Private Line, Verizon Business intends to no longer accept orders for moves, adds, or changes. Verizon Business will provide customers with at least 60 days' written notice before it stops accepting orders for moves, adds, or changes.

#### 3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Verizon Business will discontinue these services in the contiguous 48 states, as well as in Hawaii and the District of Columbia where it provides these services.

#### 4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

Private line DS0 service (64 kbps or less) is a point-to-point communications channel that offers voice, video, and data services over non-switched, non-usage sensitive dedicated facilities. The service offers two-way simultaneous transmission. The proposed discontinuance covers the following Verizon Business products: Metro Private Line and U.S. Private Line. The terms and conditions under which Verizon Business offers Metro Private Line and U.S. Private Line are available on the Internet in Verizon Business's Service Publication and Price Guide as follows:

http://www.verizonenterprise.com/external/service\_guide/reg/cp\_access\_mpls\_metro\_priv ate\_line\_service.htm.

http://www.verizonenterprise.com/external/service\_guide/reg/cp\_uspl\_us\_private\_line\_services.htm.

Verizon Business has always offered DS0 Private Line on a non-dominant basis and has not tariffed the services at least since the Commission adopted its de-tariffing rules more than ten years ago. Verizon Business's DS0 Private Line is not an incumbent LEC service.

Verizon Business is discontinuing DS0 Private Line because demand for it is declining as the marketplace moves to next-generation technologies that provide higher bandwidths, a wider range of applications, and greater value. Customers can choose from many alternative services, including Private IP service, Ethernet services, and private-line services that other providers currently offer, including carriers affiliated with Verizon Business. Consequently, the public convenience and necessity will not be impaired by this discontinuance.

# 5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):

Verizon Business sent notices to affected customers by a combination of U.S. Mail and overnight courier on or before September 3, 2013. Copies of the notices are attached as Exhibit A.

Verizon Business is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

### 6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Verizon Business is considered non-dominant with respect to the services to be discontinued.

#### **CONCLUSION**

Verizon Business respectfully requests that the Commission approve this Application.

Respectfully submitted

Michael E. Glover Of Counsel

/s/ Curtis L. Groves
William H. Johnson
Curtis L. Groves
Verizon
1320 N. Courthouse Road
9th Floor
Arlington, VA 22201
(703) 351-3084

September 3, 2013

### CERTIFICATE OF SERVICE

I hereby certify that on this 3<sup>rd</sup> day of September, 2013, I served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

/s/ Curtis L. Groves
Curtis L. Groves

#### SERVICE LIST

#### **ALABAMA**

Lucy Baxley President Alabama Public Service Commission P.O. Box 304260 Montgomery, AL 36130 The Honorable Robert J. Bentley Office of the Governor State Capitol 600 Dexter Avenue Montgomery, AL 36130-2751

#### **ARIZONA**

Gary Pierce Chairman Arizona Corporation Commission Commissioners Wing 1200 West Washington Street Phoenix, AZ 85007-2929 The Honorable Jan Brewer Office of the Governor 1700 West Washington Phoenix, AZ 85007

#### **ARKANSAS**

Colette D. Honorable Chairman Public Service Commission P.O. Box 400 Little Rock, AR 72203-0400 The Honorable Mark Beebe Office of the Governor State Capitol, Room 250 Little Rock, AR 72201

#### **CALIFORNIA**

Michael R. Peevey President Public Utilities Commission 505 Van Ness Avenue Room 5218 San Francisco, CA 94102 The Honorable Edmund G. Brown Jr. Office of the Governor State Capitol Building Sacramento, CA 95814

#### **COLORADO**

Joshua Epel Chair Public Utilities Commission 1560 Broadway Suite 250 Denver, CO 80202 The Honorable John Hickenlooper Office of the Governor 136 State Capitol Denver, CO 80203

#### CONNECTICUT

Arthur H. House Chairman Public Utility Regulatory Authority 10 Franklin Square New Britain, CT 06051 The Honorable Dannel P. Malloy Office of the Governor State Capitol 210 Capitol Avenue Hartford, CT 06106

#### **DELAWARE**

Dallas Winslow Chair Public Service Commission Cannon Building Suite 100 861 Silver Lake Boulevard Dover, DE 19904 The Honorable Jack Markell Office of the Governor Tatnall Building William Penn Street, 2<sup>nd</sup> Floor Dover, DE 19901

#### DISTRICT OF COLUMBIA

Betty Ann Kane Chairman District of Columbia Public Service Commission 1333 H Street, NW Suite 200, West Tower Washington, DC 20005 The Honorable Vincent C. Gray Office of the Mayor John A. Wilson Building 1350 Pennsylvania Avenue, NW Washington, DC 20004

#### **FLORIDA**

Ronald A. Brise Chairman Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 The Honorable Rick Scott Office of the Governor The Capitol 400 S. Monroe Street Tallahassee, FL 32399

#### **GEORGIA**

Tim G. Echols Chairman Public Service Commission 244 Washington Street Atlanta, GA 30334 The Honorable Nathan Deal Office of the Governor 203 State Capitol Atlanta, GA 30334

#### HAWAII

Hermina M. Morita Chair Public Utilities Commission 465 South King Street Room 103 Honolulu, HI 96813 The Honorable Neil Ambercrombie Governor, State of Hawaii Executive Chambers State Capitol Honolulu, HI 96813

#### **IDAHO**

Paul Kjellander President Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 The Honorable C.L. Otter Office of the Governor P.O. Box 83720 Boise, ID 83720

#### **ILLINOIS**

Doug Scott Chairman Commerce Commission 527 East Capital Avenue Springfield, IL 62701 The Honorable Pat Quinn Office of the Governor 207 State House Springfield, IL 62706

#### **INDIANA**

Jim Atterholt Chairman Indiana Utility Regulatory Commission 101 West Washington Street Suite 1500 E Indianapolis, IN 46204

The Honorable Mike Pence Office of the Governor Statehouse Indianapolis, IN 46204-2797

#### **IOWA**

Elizabeth S. Jacobs Chair Iowa Utilities Board 1375 Court Avenue Room 69 Des Moines, IL 50319-0069

The Honorable Terry E. Barnstad Office of the Governor State Capitol Des Moines, IA 50319-0001

#### **KANSAS**

Mark Sievers
Chairman
Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

The Honorable Sam Brownback Office of the Governor State Capitol 300 SW 10<sup>th</sup> Avenue Suite 212S Topeka, KS 66612-1590

#### KENTUCKY

David Armstrong Chairman Public Service Commission 211 Sower Boulevard Frankfort, KY 40602 The Honorable Steve Beshear Office of the Governor 700 Capital Avenue, Suite 100 Frankfort, KY 40601

#### **LOUISIANA**

Lambert C. Boissiere, III Commissioner Public Service Commission Galvez Building 12<sup>th</sup> Floor Public Box 91154 602 North 5<sup>th</sup> Street Baton Rouge, LA 70821 The Honorable Bobby Jindal Office of the Governor P.O. Box 94004 Baton Rouge, LA 70804-9004

#### MAINE

Thomas L. Welch Chairman Public Utilities Commission 18 State House Station Augusta, ME 04333-0018 The Honorable Paul LePage Office of the Governor 1 State House Station Augusta, ME 04333

#### **MARYLAND**

Douglas R.M. Nazarian Chairman Maryland Public Service Commission 6 St. Paul Street 16<sup>th</sup> Floor Baltimore, MD 21202-6806 The Honorable Martin O'Malley Office of the Governor State House 100 State Circle Annapolis, MD 21401-1925

#### **MASSACHUSSETTS**

Geoffrey G. Why
Commissioner
Department of Telecommunications
and Cable
1000 Washington Street
Suite 820
Boston, MA 02118

The Honorable Deval Patrick Office of the Governor Room 360 Boston, MA 02133

#### **MICHIGAN**

John D. Quackenbush Chairman Public Service Commission 6545 Mercantile Way P.O. Box 30221 Lansing, MI 48909 The Honorable Rick Synder Office of the Governor P.O. Box 30013 Lansing, MI 48909

#### **MINNESOTA**

Beverly Jones Heydinger Chair Minnesota Public Utilities Commission 121 7<sup>th</sup> Place East Suite 350 St. Paul, MN 555101-2147 The Honorable Mark Dayton Office of the Governor 130 State Capitol 75 Rev. Dr. Martin Luther King, Jr. Blvd. St. Paul, MN 55155

#### MISSISSIPPI

Lynn Posey Chairman Public Service Commission Woolfolk Building 501 N. West Street Jackson, MS 39201 The Honorable Phil Bryant Office of the Governor P.O. Box 139 Jackson, MS 39205

#### **MISSOURI**

Kevin D. Gunn Chairman Public Service Commission P.O. Box 360 Jefferson City, MO 65102 The Honorable Jay Nixon Office of the Governor State Capitol Building Room 216 Jefferson City, MO 65101

#### **MONTANA**

Travis Kavulla Chairman Public Service Commission 1701 Prospect Avenue P.O. Box 202601 Helena, MT 59620-2601 The Honorable Steve Bullock Office of the Governor Montana State Capitol Building P.O. Box 200801 Helena, MT 59620-0801

#### **NEBRASKA**

Rod Johnson Chair Public Service Commission 300 The Atrium 1200 N. Street Lincoln, NE 68509 The Honorable Dave Heineman Office of the Governor P.O. Box 94848 Lincoln, NE 68509-4848

#### NEVADA

Alaina C. Burtenshaw Chairman, Las Vegas Location Public Utilities Commission 1150 East William Street - Suite 250 Carson City, NV 89701 The Honorable Brian Sandavol Office of the Governor State Capitol 101 North Carson Street Carson City, NV 89701

#### **NEW HAMPSHIRE**

Amy L. Ignatius Chairman Public Utilities Commission 21 South Fruit Street Suite10 Concord, NH 03301-2429 The Honorable Maggie Hassan Office of the Governor State House 25 Capitol Street Concord, NH 03301

#### **NEW JERSEY**

Robert M. Hanna President New Jersey Board of Public Utilities 44 S. Clinton Ávenue Trenton, NJ 08625 The Honorable Chris Christie Office of the Governor P.O. Box 001 Trenton, NJ 08625

#### **NEW MEXICO**

Patrick H. Lyons Chairman - District 2 Public Regulation Commission Consumer Relations Division P.O. Box 1269 Santa Fe. NM 87504-1269 The Honorable Susana Martinez Office of the Governor 490 Old Santa Fe Trail Room 400 Santa Fe, NM 87501

#### **NEW YORK**

Garry A. Brown Chairman Office of Consumer Service 3 Empire State Plaza Albany, NY 12223-1350 The Honorable Andrew M. Cuomo Governor of New York State NYS State Capitol Building Albany, NY 12224

#### **NORTH CAROLINA**

Edward S. Finley Jr.
Chairman
Utilities Commission – Public Staff
Consumer Services
4326 Mail Service Center
Raleigh, NC 27699-4326

The Honorable Pat McCrory Office of the Governor 20301 Mail Service Center Raleigh, NC 27699-0301

#### NORTH DAKOTA

Kevin Cramer Commissioner Public Service Commission 600 East Boulevard Avenue Department 408 12<sup>th</sup> Floor Bismarck, ND 58505-0480 The Honorable Jack Dalrymple Office of the Governor State Capitol 600 East Boulevard Avenue Bismarck, ND 58505-0001

#### OHIO

Todd Snitchler Chairman Public Utilities Commission of Ohio 180 East Broad Street Columbus, OH 43215-3793

#### **OKLAHOMA**

Dana Murphy Chair Corporation Commission P.O. Box 52000 Oklahoma City, OK 73152-2000

#### **OREGON**

Susan K. Ackerman Chair Public Utility Commission Consumer Services Division 550 Capitol Street, NE P.O Box 2148 Salem, OR 97308-2148

#### **PENNSYLVANIA**

Robert F. Powelson Chairman Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

#### RHODE ISLAND

Elia Germani Chairman Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

#### SOUTH CAROLINA

John E. Howard Chairman Public Service Commission of South Carolina 101 Executive Center Drive Suite 100 Columbia, SC 29210 The Honorable John Kasich Office of the Governor Riffe Center, 30th Floor 77 South High Street Columbus, OH 43215-6108

The Honorable Mary Fallen Office of the Governor State Capitol Building 2300 N. Lincoln Boulevard Room 212 Oklahoma City, OK 73105

The Honorable John Kitzhaber Office of the Governor 160 State Capitol 900 Court Street Salem, Oregon 97301-4047

The Honorable Tom Corbett Office of the Governor 225 Main Capitol Building Harrisburg, PA 17120

The Honorable Lincoln D. Chafee Office of the Governor 222 State House Providence, RI 02903-1196

The Honorable Nikki R. Haley Office of the Governor P.O. Box 12267 Columbia, SC 29211

#### SOUTH DAKOTA

Chris Nelson Chairman Public Utilities Commission Consumer Affairs 500 East Capitol Avenue Pierre, SD 57501-5070 The Honorable Dennis Daugaard Office of the Governor 500 East Capitol Avenue Pierre, SD 57501

#### **TENNESSEE**

Kenneth C. Hill Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505 The Honorable Bill Haslam Office of the Governor Tennessee State Capitol Nashville, TN 37243-0001

#### TEXAS

Donna L. Nelson Chair Public Utilities Commission 1701 North Congress Avenue P.O. Box 13326 Austin, TX 78711 The Honorable Rick Perry Office of the Governor P.O. Box 12428 Austin, TX 78711

#### **UTAH**

Ted Boyer Chairman Public Service Commission 160 East 300 South Salt Lake City, UT 84111 The Honorable Gary R. Herbert Office of the Governor State Capitol Complex East Office Building, Suite E-220 Salt Lake City, UT 84114

#### **VERMONT**

James Volz Chairman Public Service Board 112 State Street Drawer 20 Montpelier, VT 05620-2701 The Honorable Peter Shumlin Office of the Governor 109 State Street, Pavilion Montpelier, VT 05609

#### **VIRGINIA**

Mark C. Christie Chairman State Corporation Commission Division of Communications P.O. Box 1197 Richmond, VA 23218 The Honorable Robert F. McDonnell Office of the Governor Patrick Henry Building 1111 East Broad Street 3<sup>rd</sup> Floor Richmond, VA 23219

#### WASHINGTON

Jeffrey D. Goltz Chairman Utilities & Transportation Commission 1300 S. Evergreen Park Drive SW P.O. Box 4750 Olympia, WA 98504 The Honorable Jack Inslee Office of the Governor P.O. Box 40002 Olympia, WA 98504-0002

#### **WEST VIRGINIA**

Michael A. Albert Chairman West Virginia Public Service Commission 201 Brooks Street Charleston, WV 25301 The Honorable Earl Ray Tomblin Office of the Governor 1900 Kanawha Boulevard E. Charleston, WV 25305

#### WISCONSIN

Phil Montgomery Chairman Consumer Affairs Unit 610 North Whitney Way Madison, WI 53705 The Honorable Scott Walker Office of the Governor P.O. Box 7863 Madison, WI 53707

#### **WYOMING**

Alan B. Minier Chairman Public Service Commission 2515 Warren Avenue Suite 300 Cheyenne, WY 82002 The Honorable Matt Mead Office of the Governor State Capitol 200 West 24<sup>th</sup> Street Cheyenne, WY 82002

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

## **EXHIBIT A**



Melissa A. Hefley Manager Wholesale Contract Managemt 6929 N. Lakewood, 202-C Tulsa, OK 74117 melissa.hefley@yerizon.com

September 3, 2013

Dear Valued Customer,

Verizon's ability to stay at the forefront of technology evolution allows us to help businesses innovate, originate, and unlock new revenue streams. In order to help you succeed in an ever-changing environment of new competitors, evolving business models, and increasingly globalized markets, we focus on the technologies that influence the way businesses operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon affiliates listed in Exhibit A (hereinafter collectively referred to as "Verizon") plan to grandfather and discontinue Metro Private Line (IntraLATA) DSO service (64Kbps or less) and US Private Line (InterLATA) DSO service (64Kbps or less)(hereinafter referred to as the "Affected Services") throughout the United States.

On or after November 4, 2013, subject to approval from the FCC (the "Effective Date"), Verizon will no longer offer the Affected Services, subject to the terms set forth below.

- If you are subscribed to the Affected Services under an agreement with Verizon on the Effective Date,
   Verizon will continue to provide you with the Affected Services (including moves, adds and changes) until
   the expiration of your contracted term (or Service Commitment Period), subject to Verizon's rights as set
   forth in your agreement.
- Unless your agreement expressly permits it, no contract renewals or extensions will be permitted for the Affected Services.
- Upon expiration of your agreement or Service Commitment Period relevant to the Affected Services, each
  Service Commitment Period shall automatically be extended on a month-to-month basis subject to the
  same terms and conditions as are then in effect with respect to such Affected Services, and further
  subject to termination by Verizon upon not less than six (6) months' written notice.
- If on the Effective Date you are subscribed to the Affected Services and purchase the Affected Services on a month-to-month basis (because your agreement or Service Commitment Period previously expired, or you originally purchased the Affected Services under a month-to-month Service Commitment Period), you will continue to receive the Affected Services on a month-to-month basis subject to the same terms and conditions as are then in effect with respect to such Affected Services, and further subject to termination by Verizon upon not less than six (6) months' written notice.
- Customers on a month-to-month agreement and month-to-month Service Commitment Period (term
  agreement and Service Commitment Period have expired) may terminate the Affected Services at any
  time without incurring Disconnection Charges and Additional Cancellation/Disconnection Charges.

Please be advised that sometime after the Effective Date, but prior to the discontinuance of the Affected Services, Verizon plans to no longer allow moves, adds, or changes to the Affected Services for customers subscribed to a term agreement (unless the agreement expressly states otherwise) and for customers who purchase the Affected Services on a month-to-month basis.

Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Affected Services offered by Verizon. The alternative services include the following:

- Private IP (PIP) Service. PIP service is a network-based virtual private network (VPN) enabling
  customers to effectively communicate over a secure network. It also provides a foundation for
  automating business processes between companies, including e-commerce, shared intranets,
  and extranets.
- Ethernet Services. Several Ethernet alternatives are available with local, national and international capability, including the following:
  - Ethernet Virtual Private Line (EVPL) Converged Packet Architecture (CPA). This EVPL service is a
    point-to-point Ethernet service. Converged Packet Architecture (CPA) is a Multi-Protocol Label
    Switching (MPLS)-based network that allows configuration of point-to-point, point-to-multipoint,
    or partial mesh designs to meet evolving data transport needs.
  - Ethernet Virtual Private Line (EVPL) Switched Ethernet Service (SES). This EVPL service is a
    point-to-point Ethernet service. Switched Ethernet Service (SES) is a fiber-based, metropolitan
    area Ethernet service that connects customer locations together using Ethernet interfaces of 10,
    100, 1,000 or 10,000 Mbps.
  - Ethernet Private Line (EPL) Service. EPL service utilizes Ethernet over SONET to provide dedicated point-to-point Ethernet connectivity between two locations. EPL circuits provide solutions for customers who require high-speed low latency and secure Ethernet wide area network (WAN) connectivity.

It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

Verizon Global Wholesale

FCC Required Notice: 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. 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 MCI Communications Services, Inc., d/b/a Verizon Business Services. 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 A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

Name and Address of Carriers (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

# Verizon Operating Companies - Name and Address MCI Communications Services, Inc., d/b/a Verizon Business Services One Verizon Way

Basking Ridge, NJ 07920

**Verizon** 22001 Loudoun County Parkway Room G2-2-556 Ashburn, VA 20147 USA



September 3, 2013

<Customer Name>

<Business Name>

<Street Address>

<City>

<State> 10001

<USA>

RE: Account Number: <Account Number>

Dear Valued Customer.

Verizon's ability to stay at the forefront of technology evolution allows us to help businesses innovate, originate, and unlock new revenue streams. In order to help you succeed in an ever-changing environment of new competitors, evolving business models, and increasingly globalized markets, we focus on the technologies that influence the way businesses operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon affiliates listed in Exhibit A (hereinafter collectively referred to as "Verizon") plan to grandfather and discontinue Metro Private Line (IntraLATA) and US Private Line (InterLATA) DSO service (64Kbps or less)(hereinafter referred to as the "Affected Services") throughout the United States.

This initiative will allow us to serve you better – ensuring you can take advantage of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

On or after November 4, 2013, subject to approval from the FCC (the "Effective Date"), Verizon will no longer offer the Affected Services to the public, subject to the terms set forth below.

- If you are subscribed to the Affected Services under an agreement with Verizon on the Effective Date, Verizon will
  continue to provide you with the Affected Services (including moves, adds and changes) until the expiration of
  your contracted term, subject to Verizon's rights as set forth in your agreement.
- Unless your agreement expressly permits it, no contract renewals or extensions will be permitted for the Affected Services.
- Following the expiration of your agreement, Verizon may elect to provide the Affected Services on a month-tomonth basis. However, Verizon reserves the right to terminate the services upon six (6) months' written notice.
- If on the Effective Date you are subscribed to the Affected Services and purchase the services on a month-tomonth basis (because your agreement previously expired), Verizon may elect to provide the Affected Services on a month-to-month basis. However, Verizon reserves the right to terminate the services upon six (6) months' written notice.
- You may terminate your Affected Services at any time.

FCC Required Notice: 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. 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 MCI Communications Services, Inc., d/b/a Verizon Business Services. 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.

Please be advised that sometime after the Effective Date, but prior to the discontinuance of the Affected Services, Verizon plans to no longer allow moves, adds, or changes to the Affected Services for customers subscribed to a term agreement (unless the agreement expressly states otherwise) and for customers who purchase the service on a month-to-month basis.

Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Grandfathered Services offered by Verizon. The alternative services include the following:

- Private IP (PIP) Service. PIP service is a network-based virtual private network (VPN) enabling
  customers to effectively communicate over a secure network. It also provides a foundation for
  automating business processes between companies, including e-commerce, shared intranets, and
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It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

<Pre><VP Name - AVP or GVP>
<Area Vice President>
Verizon Enterprise Solutions

Exhibit A

Sections 63,71(a) and (b) of the FCC's rules require Verizon to provide the following information:

Name and Address of Carriers (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

Verizon Operating Companies - Name and Address

MCI Communications Services, Inc. One Verizon Way Basking Ridge, NJ 07920 **Verizon** 22001 Loudoun County Parkway Room G2-2-556 Ashburn, VA 20147 USA



September 3, 2013

<Customer Name>
<Business Name>
<Street Address>
<City>
<USA>
<State>
10001

RE: Account Number: <Account Number>

Dear Valued Customer,

Verizon's ability to stay at the forefront of the technology evolution allows us to help government agencies remain efficient, responsive and secure. To consistently help you succeed in an ever-changing and increasingly globalized environment, we continue to focus on the technologies that are influencing the way organizations operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon affiliates listed in Exhibit A (hereinafter collectively referred to as "Verizon") plan to grandfather and discontinue Metro Private Line (IntraLATA) and US Private Line (InterLATA) DS0 service (64Kbps or less)(hereinafter referred to as the "Affected Services") throughout the United States.

This initiative will allow us to serve you better – ensuring you can take advantage of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

On or after November 4, 2013, subject to approval from the FCC (the "Effective Date"), Verizon will no longer offer the Affected Services to the public, subject to the terms set forth below.

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  continue to provide you with the Affected Services (including moves, adds and changes) until the expiration of
  your contracted term, subject to Verizon's rights as set forth in your agreement.
- Unless your agreement expressly permits it, no contract renewals or extensions will be permitted for the Affected Services.
- Following the expiration of your agreement, Verizon may elect to provide the Affected Services on a month-tomonth basis. However, Verizon reserves the right to terminate the services upon six (6) months' written notice.
- If on the Effective Date you are subscribed to the Affected Services and purchase the services on a month-tomonth basis (because your agreement previously expired), Verizon may elect to provide the Affected Services on a month-to-month basis. However, Verizon reserves the right to terminate the services upon six (6) months' written notice.
- You may terminate your Affected Services at any time.

Please be advised that sometime after the Effective Date, but prior to the discontinuance of the Affected Services, Verizon plans to no longer allow moves, adds, or changes to the Affected Services for customers subscribed to a term agreement

FCC Required Notice: 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. 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 MCI Communications Services, Inc., d/b/a Verizon Business Services. 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.

(unless the agreement expressly states otherwise) and for customers who purchase the service on a month-to-month basis.

Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Grandfathered Services offered by Verizon. The alternative services include the following:

- Private IP (PIP) Service. PIP service is a network-based virtual private network (VPN) enabling
  customers to effectively communicate over a secure network. It also provides a foundation for
  automating business processes between companies, including e-commerce, shared intranets, and
  extranets.
- Ethernet Services. Several Ethernet alternatives are available with local, national and international capability, including the following:
  - Ethernet Virtual Private Line (EVPL) Converged Packet Architecture (CPA). This EVPL service is a
    point-to-point Ethernet service. Converged Packet Architecture (CPA) is a Multi-Protocol Label Switching
    (MPLS)-based network that allows configuration of point-to-point, point-to-multipoint, or partial mesh
    designs to meet evolving data transport needs.
  - Ethernet Virtual Private Line (EVPL) Switched Ethernet Service (SES). This EVPL service is a point-topoint Ethernet service. Switched Ethernet Service (SES) is a fiber-based, metropolitan area Ethernet
    service that connects customer locations together using Ethernet interfaces of 10, 100, 1,000 or 10,000
    Mbps.
  - Ethernet Private Line (EPL) Service. EPL service utilizes Ethernet over SONET to provide dedicated point-to-point Ethernet connectivity between two locations. EPL circuits provide solutions for customers who require high-speed low latency and secure Ethernet wide area network (WAN) connectivity.

It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

<VP Name - AVP or GVP>
<Area Vice President>

Verizon Enterprise Solutions

#### Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

Name and Address of Carriers (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

## Verizon Operating Companies - Name and Address

MCI Communications Services, Inc. One Verizon Way Basking Ridge, NJ 07920