



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

July 15, 2019
Via ETFS Filing

To Whom it May Concern

Pursuant to FCC Part 47, Section 63.71 of the Code of Federal Regulations, you are hereby copied on the enclosed Application to Discontinue Service submitted on behalf of Talk America Services, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant

Enclosures

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

In the Matter of)
Section 63.71 Application of) File No. _____
Talk America Services, LLC)
to Discontinue Services _____)

Section 63.71 Application of Talk America Services, LLC

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of exchange access and/or interstate long distance services in the states of Arizona, South Dakota, Texas and Utah. This proposed discontinuance will affect approximately 230 existing customers.¹

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

1. Name and corporate headquarters address of Carrier

Talk America Services, LLC
10802 Executive Center Drive
Benton Building, Suite 300
Little Rock, AR 72211

2. Correspondence concerning this Application should be sent to:

Sharon Thomas
Consultant to Talk America Services, LLC
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: sthomas@inteserra.com

¹ Talk America Services also intends to disconnect local exchange service (dial tone and local usage), digital subscriber line ("DSL") internet access, and intrastate long-distance services to some of the affected customers. These services are not subject to the FCC's Section 214 discontinuance rules and are, therefore, not included as part of this request for authorization. However, customers are being notified regarding all of the services that are to be discontinued.

3. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the services that are the subject of this Application on or about September 15, 2019, pending required federal and state regulatory approval of the discontinuance.

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

Talk America Services proposes to discontinue all of its telecommunications services in the states of Arizona, South Dakota, Texas and Utah. Services provided to existing customers will be discontinued and services will no longer be offered to new customers following the proposed discontinuance.

5. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

The table below identifies the types of telecommunications services and affected customers within each state impacted by the proposed discontinuance of service.

State	Local Exchange/Exchange Access Lines and Intrastate/Interstate Long Distance (Bundled)	Intrastate and Interstate Long Distance Only	Total Affected Customers
Arizona	12	16	28
South Dakota	43	5	48
Texas	65	7	72
Utah	71	11	82

The services subject to the FCC's jurisdiction that are the subject of this request for authorization are exchange access and interstate long distance. Talk America Services relies exclusively on an underlying provider to provide services in the affected states. The underlying provider has notified Talk America Services that it will no longer provide or support these services. Consequently, Talk America Services must discontinue service to the affected customers.

As described below, Talk America Services is providing all affected customers with ample notice of the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

6. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice was provided via 1st class U.S. mail to all affected customer on July 15, 2019. The notice for Arizona, South Dakota and Utah customers is attached as Exhibit A and the notice for Texas customers is attached as Exhibit B.

A copy of this Application is being sent to the state regulatory commissions and governors' offices in all of the affected states, as well as to the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit C.

Conclusion

Talk America Services, LLC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31st day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 15th day of July, 2019.

By: /s/ Allison W. Taylor

Allison W. Taylor
Vice President, Operations
Talk America Services, LLC

Sharon Thomas, Consultant to
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: sthomas@inteserra.com

Exhibit A

Customer Notice for Arizona, South Dakota and Utah



2134 W Laburnum Ave.
Richmond, VA 23227

July 15, 2019

Customer Name
Customer Address
City, State Zip

URGENT: Your telephone services will be impacted unless you take action!

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the states of Arizona, South Dakota and Utah on or after September 15, 2019, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for selecting an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers before September 15, 2019. Therefore, you will need to migrate the services you now receive from Talk America Services to an alternative provider **before September 15, 2019.**

A filing is being made with the FCC for approval of this discontinuance of service. 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 Talk America Services, 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.

You may contact Talk America Services directly to obtain information about this discontinuance, including how to receive a refund on any unused service or how to contact regulatory agencies to obtain information on possible replacement providers. Talk America Services' customer service can be reached at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,
Talk America Services, LLC

Exhibit B

Customer Notice for Texas



2134 W Laburnum Ave.
Richmond, VA 23227

July 15, 2019

Customer Name
Customer Address
City, State Zip

URGENT: Your telephone services will be impacted unless you take action!

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the state of Texas on or after September 15, 2019, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for selecting an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers before September 15, 2019. Therefore, you will need to migrate the services you now receive from Talk America Services to an alternative provider **before September 15, 2019.** Applicable switchover fees that may be required to switch your service to the carrier of your choice will be paid by Talk America Services.

A filing is being made with the FCC for approval of this discontinuance of service. 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 Talk America Services, 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.

You may contact Talk America Services directly to obtain information about this discontinuance, including how to receive a refund on any unused service or how to contact regulatory agencies to obtain information on possible replacement providers. Talk America Services' customer service can be reached at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,
Talk America Services, LLC

Exhibit C – Service List

Docket Control Center
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2927

Office of Governor Doug Ducey
State Capitol
1700 West Washington
Phoenix, AZ 85007

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501-5070

Office of Governor Kristi Noem
500 East Capitol Avenue
Pierre, SD 57501

Central Records Clerk
Public Utilities Commission of Texas
1701 N. Congress Avenue
Austin, TX 78711-3326

Office of Governor Greg Abbott
P.O. Box 12428
Austin, TX 78711

Commission Secretary
Utah Public Service Commission
Heber M. Wells Building
Salt Lake City, UT 84114

Office of Governor Gary R. Herbert
Utah State Capitol
Suite 200
Salt Lake City, UT 84114

U.S. Department of Defense
Pentagon
Attn. Special Assistant for Telecom.
Washington, DC 20301

CERTIFICATE OF SERVICE

STATE OF FLORIDA)
COUNTY OF ORANGE)

On this date, July 15, 2019, the foregoing Section 63.71 Application was sent by U.S. Mail postage prepaid to the service list contained in Exhibit C.

/s/Ken Yeager
For Shipping Department
Inteserra Consulting Group, Inc.