

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)
) WC Docket No. 23-_____
Section 63.71 Application of)
Blueface US, LLC)

SECTION 63.71 APPLICATION

Blueface US, LLC (“Blueface” or “Applicant”), a subsidiary of Comcast Corporation (“Comcast”), hereby seeks authorization, pursuant to Section 214(a) of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214(a), and Section 63.71 of the rules of the Federal Communications Commission (“FCC” or “Commission”), 47 C.F.R. § 63.71, to discontinue its offering and provision of over-the-top (“OTT”) interconnected voice over Internet protocol (“VoIP”) service and associated features. Blueface has less than eight hundred active OTT VoIP customers and maintaining the service as a standalone offering is no longer commercially viable or consistent with the company’s business plans.

Specifically, Blueface intends to stop offering OTT VoIP service to the public and to discontinue service to its remaining customers on or after February 28, 2024. The proposed discontinuance will not result in material harm to these customers, as they may obtain alternative services from Comcast or a variety of other providers, including traditional wireline providers, facilities-based VoIP providers, and non-facilities-based VoIP providers.

The Applicant provides the following information pursuant to Section 63.71 of the Commission’s rules:

1. Name and Address of Carrier: Blueface US, LLC, One Comcast Center, Philadelphia, PA 19103.

2. Date of Planned Service Discontinuance, Reduction, or Impairment: Blueface plans to discontinue its provision of the OTT VoIP service on or after February 28, 2024. Blueface understands that this Application will be granted automatically on the 31st day after public notice of its filing unless the Commission notifies it to the contrary.
3. Points of Geographic Areas of Service Affected: Blueface currently provides its OTT VoIP services to customers in Alabama, Arizona, California, Colorado, Connecticut, the District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Texas, Utah, Washington, Wisconsin, and Wyoming.
4. Brief Description of Type of Service Affected: As noted above, Blueface intends to discontinue its offering and provision of OTT VoIP service and associated features (e.g., call conferencing, call paging).
5. Brief Description of the Dates and Methods of Notice to All Affected Customers: In accordance with Section 63.71(a), on October 30, 2023, Blueface provided written notice by first class mail to all affected customers. A sample copy of the notice provided to customers is attached hereto as Attachment A. In addition to this formal notification, Blueface previously advised each of its customers of its plan to discontinue this service, including through an informal notice letter on October 5, 2023.

6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to be Discontinued, Reduced, or Impaired: Blueface is considered non-dominant with respect to the affected service.

In accordance with Section 63.71 of the Commission's Rules, a copy of this Application is being mailed to the Special Assistant for Telecommunications for the Secretary of Defense and to the public utility commission and the Governor of each state in which Blueface currently provides customers the OTT VoIP service subject to this application.

The public convenience and necessity will not be adversely affected by the discontinuance of the OTT VoIP service. All customers that will be affected have been given notice affording them ample time to acquire one of the many substitute services that are readily available. Blueface, therefore, respectfully requests Commission approval of this Section 63.71 Application. Please direct any questions regarding this Application to the undersigned.

Respectfully submitted,

Blueface US, LLC

/s/ Richard Chapkis

Richard Chapkis

Corporate Vice President

Senior Deputy General Counsel

COMCAST CORPORATION

One Comcast Center

Philadelphia, PA 19103

E-Mail: Richard.Chapkis@comcast.com

Emily Daniels

Lawler, Metzger, Keeney & Logan, LLC

1717 K STREET NW, SUITE 1075

Washington, DC 20006

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Counsel to Blueface US, LLC and Comcast

Stephanie Power

Vice President, Regulatory Affairs

COMCAST CORPORATION

300 New Jersey Avenue NW, Suite 700

Washington, DC 20001

E-Mail: Stephanie.Power@comcast.com

Dated: October 31, 2023

ATTACHMENT A



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93/94 North Wall Quay,
Dublin 1, Ireland.
D01 V8Y6

E: info@blueface.com
P: +353 (1) 524 2000
F: +353 (1) 443 0400
W: www.blueface.com

October 30, 2023

<<Customer Name>>
<<Address Line 1>>
<<Address Line 2>>
<<City, State Zip>>

<<Customer Name>>,

We are writing to remind you that Blueface US, LLC ("Blueface"), a subsidiary of Comcast Corporation ("Comcast"), intends to discontinue its over-the-top ("OTT") interconnected voice over Internet protocol ("VoIP") services and associated features as soon as February 28, 2024. This discontinuance will impact all states that currently receive OTT VoIP services: Alabama, Arizona, California, Colorado, Connecticut, the District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Texas, Utah, Washington, Wisconsin, and Wyoming.

Please note that you are responsible for making the necessary arrangements to transition to an alternative service provided by Comcast Business or one of the many alternate service providers available in your area. Blueface will continue to provide you with reasonable support and assistance during your transition in order to minimize the potential for service disruptions. There will be no early termination fee should you decide to move your services prior to the planned Blueface shutdown.

Blueface has notified the Federal Communications Commission ("FCC" or "Commission") about its plan to discontinue these OTT VoIP services and features. 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 Blueface US, 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.

If you have any questions, you may contact us at accounts@blueface-us.com or 888-770-0971. As a valued Blueface customer, we will do our best to make your transition to a Comcast Business service or new service provider as smooth as possible.

Sincerely,

Blueface US, LLC
One Comcast Center
Philadelphia, PA 19103

CERTIFICATE OF SERVICE

I, Emily Daniels, hereby certify that a copy of the foregoing Section 63.71 Application of Blueface US, LLC was served on this 31st day of October, 2023, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below:

Office of Governor Kay Ivey
State Capitol
600 Dexter Avenue
Montgomery, AL 36130

Alabama Public Service Commission
P.O. Box 304260
Montgomery, AL 36130

Office of Governor Katie Hobbs
1700 W. Washington St.
Phoenix, AZ 85007

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2996

Office of Governor Gavin Newsom
1021 O St., Suite 9000
Sacramento, CA 95814

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Office of Governor Jared Polis
200 E. Colfax Avenue, Room 136
Denver, CO 80203

Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202

Office of Governor Ned Lamont
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Connecticut Public Utilities Regulatory
Authority
10 Franklin Square
New Britain, CT 06051

Office of Mayor Muriel Bowser
1350 Pennsylvania Avenue N.W., Suite 316
Washington, DC 20004

Public Service Commission of the
District of Columbia
1325 G Street N.W., Suite 800
Washington, DC 20005

Office of Governor Ron DeSantis
The Capitol
400 South Monroe Street
Tallahassee, FL 32399-0001

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Office of Governor Brian P. Kemp
206 Washington Street
111 State Capitol
Atlanta, GA 30334

Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-9052

Office of Governor Brad Little
State Capitol
P.O. Box 83720
Boise, ID 83720

Idaho Public Utilities Commission
1331 W. Chinden Blvd., Suite 201-a
Boise, ID 83714

Office of Governor J.B. Pritzker
401 Spring St.
Springfield, IL 62704

Illinois Commerce Commission
Legend Building
527 East Capitol Avenue
Springfield, IL 62701

Office of Governor Eric J. Holcomb
200 West Washington Street, Room 206
Indianapolis, IN 46204

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

Governor Kim Reynolds
Iowa State Capitol
1007 E. Grand Ave # 101
Des Moines, IA 50319

Iowa Utilities Board
1375 E. Court Ave.
Des Moines, IA 50319-0069

Office of Governor Laura Kelly
Capitol
300 Southwest 10th Avenue, Suite 241S
Topeka, KS 66612-1590

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Office of Governor John Bel Edwards
P.O. Box 94004
Baton Rouge, LA 70804

Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
P.O. Box 91154
Baton Rouge, LA 70821-9154

Office of Governor Janet T. Mills
1 State House Station
Augusta, ME 04333

Maine Public Utilities Commission
18 State House Station
Augusta, ME 04333-0018

Office of Governor Wes Moore
100 State Circle
Annapolis, MD 21401-1925

Public Service Commission of Maryland
William Donald Schaefer Tower
6 St. Paul Street, #1600
Baltimore, MD 21202

Office of Governor Maura Healey
Massachusetts State House, Room 280
24 Beacon St.
Boston, MA 02133

Massachusetts Department of
Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118-6500

Office of Governor Gretchen Whitmer
P.O. Box 30013
Lansing, MI 48909

Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Office of Governor Tim Waltz
130 State Capitol
75 Rev. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Office of Governor Michael L. Parson
P.O. Box 720
Jefferson City, MO 65102

Missouri Public Service Commission
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102-0360

Office of Governor Greg Gianforte
P.O. Box 200801
Helena, MT 59620-0801

Montana Public Service Commission
1701 Prospect Ave.
P.O. Box 202601
Helena, MT 59620-2601

Office of Governor Jim Pillen
P.O. Box 94848
Lincoln, NE 68509-4848

Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508

Office of Governor Joe Lombardo
State Capitol Building
101 N. Carson Street
Carson City, NV 89701

Nevada Public Utilities Commission
1150 E. William Street
Carson City, NV 89701-3109

Office of Governor Christopher T. Sununu
State House
107 North Main Street
Concord, NH 03301

New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Office of Governor Phil Murphy
P.O. Box 001
Trenton, NJ 08625

New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton, NJ 08625

Office of Governor Michelle Lujan Grisham
490 Old Santa Fe Trail, Room 400
Santa Fe, NM 87501

New Mexico Public Regulation Commission
P.O. Box 1269
Santa Fe, NM 87504-1269

Office of Governor Kathy Hochul
NYS State Capitol Building
Albany, NY 12224

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

Office of Governor Roy Cooper
20301 Mail Service Center
Raleigh, NC 27699-0301

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

Office of Governor Mike DeWine
Riffe Center, 30th Floor
77 South High Street
Columbus, OH 43215-6117

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Office of Governor J. Kevin Stitt
2300 N. Lincoln Blvd., Suite 212
Oklahoma City, OK 73105

Oklahoma Corporation Commission – Public
Utility Division
2401 North Lincoln Blvd.
Oklahoma City, OK 73105

Office of Governor Tina Kotek
State Capitol Building
900 Court Street NE, Suite 254
Salem, OR 97301-4047

Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97308-1088

Office of Governor Josh Shapiro
508 Main Capitol Building
Harrisburg, PA 17120

Pennsylvania Public Utility Commission
400 North Street
Keystone Building
Harrisburg, PA 17120

Office of Governor Henry McMaster
State House
1100 Gervais Street
Columbia, SC 29201

The Public Service Commission of South
Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

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

South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501-5070

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

Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

Office of Governor Spencer Cox
350 North State Street, Suite 200
P.O. Box 142220
Salt Lake City, UT 84114-2220

Public Service Commission of Utah
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111

Office of Governor Jay Inslee
P.O. Box 40002
Olympia, WA 98504-0002

Washington Utilities and Transportation
Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Office of Governor Tony Evers
P.O. Box 7863
Madison, WI 53707

Wisconsin Public Services Commission
North Tower, 6th Floor
Hills Farms State Office Building
4822 Madison Yards Way
Madison, WI 53705

Office of Governor Mark Gordon
State Capitol
200 W 24th Street
Cheyenne, WY 82002

Wyoming Public Service Commission
Hansen Building
2515 Warren Avenue, Suite 300
Cheyenne, WY 82002

Secretary of Defense
Attn: Special Assistant for
Telecommunications
Pentagon
1400 Defense Pentagon
Washington, DC 20301-1400

/s/ Emily Daniels
Emily Daniels