

PENDING PETITION MEMO

Date: 11/29/2007

TO : OT
OGC
A&F

FROM: CENTRAL OPERATIONS

UTILITY: SBC LONG DISTANCE, LLC, D/B/A SBC LONG DISTANCE, D/B/A AT&T
LONG DISTANCE

SUBJECT: 07-C-1425

Petition of SBC Long Distance, LLC, d/b/a SBC Long Distance, d/b/a
AT&T Long Distance Exit Plan for Business Local Telephone Service in
New York.

PAINTER LAW FIRM, PLLC

13017 DUNHILL DRIVE
FAIRFAX, VIRGINIA 22030

2007 NOV 29 AM 10:05

MICHELLE PAINTER
ATTORNEY AT LAW

703.201.6378
FAX 703.968.5936
E-mail: painterlawfirm@verizon.net

November 28, 2007

Jaclyn A. Brillling, Secretary
State of New York Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Re: SBC Long Distance, LLC's ("SBCLD") exit plan for business local
telephone service in New York

Dear Secretary Brillling,

This letter and attached documentation serve as notice that SBC Long Distance, LLC ("SBCLD")¹ will be discontinuing the provisioning of local telecommunications service to ninety-six (96) of its New York business customers beginning on March 17, 2008.² SBCLD will terminate the affected customers from March 17, 2008 through April 30, 2008 and will cease providing local voice service to the business customers affected by this exit plan as of April 30, 2008.

Pursuant to the Mass Migration Guidelines established in Case 00-C-0188, SBCLD provides the following information regarding its discontinuance of local business service:

1. SBCLD will send two notice letters to customers informing them that they must choose another local carrier. Those notice letters are attached to this Exit Plan as Exhibit A. The first letter will be sent on or about December 28, 2007. The second letter will be sent on or about January 31, 2008. Customers will be informed that they must select an alternate local carrier by no later than thirty days prior to the date their service is disconnected in order to ensure that they do not lose their local service. SBCLD proposes a final termination date of April 30, 2008, and SBCLD will begin discontinuing customers' service on or about March 17, 2008. There is no acquiring carrier, so customers must affirmatively choose another local service provider to avoid losing their local telephone service.

¹ The official name of the company is SBC Long Distance, LLC d/b/a AT&T Long Distance.

² SBCLD is not abandoning the provisioning of all local telecommunications services in New York and is not requesting that its local certification be cancelled at this time. In addition, SBCLD intends to continue offering intrastate long distance services to customers in New York.

2. As of November 1, 2007, there are a total of ninety-six (96) local business customers with 266 analog POTS lines and 141 T-1 circuits affected by SBCLD's partial discontinuance of local service. Of the 266 POTS lines, 34 are served via resale of Verizon New York Inc.'s ("Verizon") local telephone service and 232 are served via unbundled network element-loops. Each of those customers has other service providers readily available. In addition to other CLECs, cable telephony providers, wireless carriers or other service providers who are available to SBCLD's customers, each of them can also obtain service from Verizon if they so choose.

3. SBCLD must maintain limited numbering resources to support its remaining business customers. However, SBCLD will coordinate with the North American Numbering Plan Administration ("NANPA") and NeuStar Pooling Administration for the transfer or return of any unused numbering resources following the disconnect of the business customers. This will be done in accordance with the Central Office Code Assignment Guidelines (COCAG) and the Thousands-Block Number Pooling Administration Guidelines (TBPAG). SBCLD will send a letter to NANPA informing NANPA of SBCLD's plan to discontinue the provisioning of local service to business customers. A copy of the letter that will be sent to NANPA is attached hereto as Exhibit B. In addition, SBCLD will need E-911 resources to support remaining business customers. However, SBCLD will unlock all other E-911 records and will terminate any 911 trunks that are no longer being used. SBCLD will send a letter to the appropriate E-911 service provider as required by the Mass Migration Guidelines. A copy of the letter that will be sent is attached hereto as Exhibit C.

4. SBCLD did not take any customer deposits. To the extent a customer has a credit on his or her last invoice, SBCLD will issue a refund within thirty to forty-five days of the customer's termination of service.

5. SBCLD does not intend to implement soft dial tone for business customers. SBCLD intends to work closely with each customer and encourage them to switch their local telephone service by the termination date.

6. The name and telephone number of the regulatory contact and program manager is: Sam Maropis at (210) 246-8757. The name and telephone number of the customer service contact is Summer Wright at (214) 689-7475.

7. SBCLD maintains its Customer Service Records ("CSRs") in a BOSS format. CSRs contain the following data elements: Customer Listing Name, Listed Address, Service Address, Bill Name, Bill Address, Service and Equipment USOCs that define the customer's package/solution and vertical features. PIC/LPIC information is masked when the carrier is NOT SBCLD 5792 CIC. The CSR, upon disconnection of an account, will go to 'Final' status from the 'Live' status. Once a billing cycle completes after the disconnect order posts to show the CSR as 'Final' status, the CSR is no longer available. This is the usual business process in the industry. SBCLD's Customer Care Center has a documented process on how any ILEC/CLEC can request a CSR and submit the LSR to request account migration.

Jaclyn A. Brillling, Secretary
Page 3 of 3

8. SBCLD will file a tariff to withdraw its business local service offering consistent with this exit plan. This tariff will be filed approximately thirty (30) days in advance of April 30, 2008.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me or Mary Burgess at (518) 463-3148.

I have enclosed an original and five (5) copies of this letter for filing. Please also find enclosed a proof of filing copy that I ask you to date stamp and return to me in the enclosed self-addressed postage pre-paid envelope.

Very truly yours,

A handwritten signature in black ink that reads "Michelle Painter". The signature is written in a cursive style with a large initial "M".

Michelle Painter

cc: Mary Burgess, Esq.

EXHIBIT A

CUSTOMER NOTICE LETTERS

Date

Important Notice Regarding Discontinuance of your AT&T Local Telephone Service¹

Dear Valued Customer:

AT&T values your business, and we'd like to update you on some important changes underway. As you may know, in November 2005, AT&T Corp. and SBC Communications Inc. joined together to form the new AT&T. As part of the integration process, the affiliated companies are streamlining their business service portfolios. As a result, several local telephone service offerings provided to you by SBC in New York are being phased out.

Subject to any applicable regulatory approvals, we intend to begin discontinuing this service on or about March 17, 2008.

SBC Long Distance will no longer provide the following products:

- Business Access Lines including all packages and bundles such as: Phone Solutions and Phone Solutions Plus.
- Primary Rate ISDN (PRI)
- Digital Trunks (DTS)
- T-1 Integrated Access (IAS)

Only the services listed above are impacted by this letter; other AT&T services such as long distance calling and transport, interLATA private line, frame and ATM services or local services from another affiliate, will not be affected by this action.

YOUR ACTION IS REQUIRED! To prevent interruption of your local business telephone service, you must select another service provider or another service from AT&T Communications Of New York, Inc. ("AT&T") on or before February 14, 2008. This should allow enough time for your new local service provider to start your new phone service before our service is discontinued.

AT&T still offers alternative local services to those being phased out. We sincerely hope you will remain with AT&T. For questions about how you can take advantage of AT&T's new suite of products and services, we invite you to contact your account representative.

You have the right to select any company that is offering local telephone service in your area. If you do not choose to take advantage of AT&T's services, you may look in the front of your Yellow Pages directory under "telephone companies," or in the front of your White Pages directory for a list of local telephone service providers.

After selecting a different local telephone provider, you should also contact your current long distance provider(s) to ensure that your current long distance calling plan(s) is not changed as the result of your change in local service. If you do not contact these providers to ensure that your current calling plans remain in place after you transfer your local service, you may be

¹ Your local telephone service is provided by SBC Long Distance, LLC, d/b/a AT&T Long Distance.

charged basic rates (non-calling plan rates) for local toll and long distance calls. Please be aware that you are responsible for paying all bills rendered to you by SBC during this transition.

We thank you for being an AT&T customer, and we apologize for the inconvenience of having to change your service. Our goal is your satisfaction, and we sincerely hope AT&T can continue to be your local telephone company. Your AT&T Account Representative will be contacting you to discuss other AT&T services that may be right for you. In the meantime, if you have questions please contact your account representative directly. If you have any questions on your current service or do not know who your account executive is please contact customer service toll free at 1-877-430-7228

Again, our apologies for the inconvenience. AT&T looks forward to serving you well into the future.

Sincerely

SBC Long Distance, LLC, d/b/a AT&T Long Distance

Date

Important Notice Regarding Discontinuance of your AT&T Local Telephone Service¹

Dear Valued Customer:

AT&T values your business, and we'd like to update you on some important changes underway. As you may know, in November 2005, AT&T Corp. and SBC Communications Inc. joined together to form the new AT&T. As part of the integration process, the affiliated companies are streamlining their business service portfolios. As a result, several local telephone service offerings provided to you by SBC in New York are being phased out.

Subject to any applicable regulatory approvals, we intend to begin discontinuing this service on or about March 17, 2008.

SBC Long Distance will no longer provide the following products:

- Business Access Lines including all packages and bundles such as: Phone Solutions and Phone Solutions Plus.
- Primary Rate ISDN (PRI)
- Digital Trunks (DTS)
- T-1 Integrated Access (IAS)

Only the services listed above are impacted by this letter; other AT&T services such as long distance calling and transport, interLATA private line, frame and ATM services or local services from another affiliate, will not be affected by this action.

YOUR ACTION IS REQUIRED! To prevent interruption of your local business telephone service, you must select another service provider or another service from AT&T Communications Of New York, Inc. ("AT&T") on or before February 14, 2008. This should allow enough time for your new local service provider to start your new phone service before our service is discontinued. If you do not select a new telephone provider, Verizon will become your new local service provider.

AT&T still offers alternative local services to those being phased out. We sincerely hope you will remain with AT&T. For questions about how you can take advantage of AT&T's new suite of products and services, we invite you to contact your account representative.

You have the right to select any company that is offering local telephone service in your area. If you do not choose to take advantage of AT&T's services, you may look in the front of your Yellow Pages directory under "telephone companies," or in the front of your White Pages directory for a list of local telephone service providers.

After selecting a different local telephone provider, you should also contact your current long distance provider(s) to ensure that your current long distance calling plan(s) is not changed as the result of your change in local service. If you do not contact these providers to ensure that your current calling plans remain in place after you transfer your local service, you may be

¹ Your local telephone service is provided by SBC Long Distance, LLC, d/b/a AT&T Long Distance.

charged basic rates (non-calling plan rates) for local toll and long distance calls. Please be aware that you are responsible for paying all bills rendered to you by SBC during this transition.

We thank you for being an AT&T customer, and we apologize for the inconvenience of having to change your service. Our goal is your satisfaction, and we sincerely hope AT&T can continue to be your local telephone company. Your AT&T Account Representative will be contacting you to discuss other AT&T services that may be right for you. In the meantime, if you have questions please contact your account representative directly. If you have any questions on your current service or do not know who your account executive is please contact customer service toll free at 1-877-430-7228

Again, our apologies for the inconvenience. AT&T looks forward to serving you well into the future.

Sincerely

SBC Long Distance, LLC, d/b/a AT&T Long Distance

Date

Important Notice Regarding Discontinuance of your Local Telephone Service

Dear Valued Customer:

As you were previously notified, the SBC¹ local telephone service to which you subscribe will no longer be available as of March 17, 2008 and **you must take immediate action.**

Please disregard this letter if you have already placed an order to transfer your business local phone service to another service provider or to another service with AT&T Communications Of New York, Inc. ("AT&T").

If you have not yet made arrangements to transfer your business local phone service to another service provider or to another service with AT&T, you must do so on or before February 14, 2008 to prevent the loss of your business local telephone service.

Even though your particular service is being discontinued, AT&T offers an exciting array of other services to meet your needs. We encourage you to contact your AT&T Account Representative to discuss other AT&T service options that may be right for you.

You have the right to select any company that is offering local telephone service in your area. If you do not choose to take advantage of AT&T's services, you may look in the front of your Yellow Pages directory under "telephone companies," or in the front of your White Pages directory for a list of local telephone service providers.

Please select your new service plans carefully – local, toll and long distance -- to ensure that your needs are met. Companies may offer pricing plans and calling areas that differ from the ones you have today. It is up to you to select plans that are right for your circumstances

After your business local telephone service has been discontinued, you will receive a final bill within 7 to 14 days; a final credit statement, if one is due, from SBC within 30 to 45 days. If you qualify for a refund, one will be issued within 30 to 45 days.

We thank you for being an AT&T customer, and we apologize for the inconvenience of having to change your service. Our goal is your satisfaction, and we sincerely hope AT&T can continue to be your local telephone company. If you have questions please contact your account representative directly or if you have questions on your current service or do not know who your account executive is please contact customers service toll free at 1-877-430-7228.

Again, our apologies for the inconvenience. AT&T looks forward to serving you well into the future.

Sincerely
SBC Long Distance, LLC, d/b/a AT&T Long Distance

¹ Your local telephone service is provided by SBC Long Distance, LLC, d/b/a AT&T Long Distance

Date

Important Notice Regarding Discontinuance of your Local Telephone Service

Dear Valued Customer:

As you were previously notified, the SBC¹ local telephone service to which you subscribe will no longer be available as of March 17, 2008 and **you must take immediate action**.

Please disregard this letter if you have already placed an order to transfer your business local phone service to another service provider or to another service with AT&T Communications Of New York, Inc. ("AT&T").

If you have not yet made arrangements to transfer your business local phone service to another service provider or to another service with AT&T, you must do so on or before February 14, 2008 to prevent the loss of your business local telephone service. If you do not select a new telephone provider, Verizon will become your new local service provider.

Even though your particular service is being discontinued, AT&T offers an exciting array of other services to meet your needs. We encourage you to contact your AT&T Account Representative to discuss other AT&T service options that may be right for you.

You have the right to select any company that is offering local telephone service in your area. If you do not choose to take advantage of AT&T's services, you may look in the front of your Yellow Pages directory under "telephone companies," or in the front of your White Pages directory for a list of local telephone service providers.

Please select your new service plans carefully – local, toll and long distance -- to ensure that your needs are met. Companies may offer pricing plans and calling areas that differ from the ones you have today. It is up to you to select plans that are right for your circumstances

After your business local telephone service has been discontinued, you will receive a final bill within 7 to 14 days; a final credit statement, if one is due, from SBC within 30 to 45 days. If you qualify for a refund, one will be issued within 30 to 45 days.

We thank you for being an AT&T customer, and we apologize for the inconvenience of having to change your service. Our goal is your satisfaction, and we sincerely hope AT&T can continue to be your local telephone company. If you have questions please contact your account representative directly or if you have questions on your current service or do not know who your account executive is please contact customers service toll free at 1-877-430-7228.

Again, our apologies for the inconvenience. AT&T looks forward to serving you well into the future.

Sincerely

¹ Your local telephone service is provided by SBC Long Distance, LLC, d/b/a AT&T Long Distance

EXHIBIT B

LETTER TO NANPA

Date

North American Numbering Plan Administration
Beth Sprague, Regional Director
46000 Center Oak Plaza
Sterling, VA 20166

Dear Ms. Sprague:

This letter is to inform NANPA that SBC Long Distance, LLC d/b/a AT&T Long Distance, OCN 3868, intends to discontinue offering business local service to ninety-six (96) of its business customers in the state of New York between the dates of March 17 and April 30, 2008.

At this time, our plan is to continue to provide local service to a limited number of business customers. Accordingly, we will retain the number resources for that purpose. However, SBCLD will coordinate with the NeuStar, Inc. North American Numbering Plan Administration and Pooling Administration for the transfer or return of any unused numbering resources following the disconnect of the business customers. This will be done in accordance with the Central Office Code Assignment Guidelines (COCAG) and the Thousands-Block Number Pooling Administration Guidelines (TBPAG).

Business customers will be notified by mail of this action and will be given an opportunity to select another carrier on an individual basis. There will not be a "mass" migration to a single, acquiring carrier. Instead, we will authorize the release of each customer's telephone number to the carrier selected by the customer, as in a routine migration. Also, a portion of the customers are provisioned via resale of ILEC services.

Thank you,

EXHIBIT C

LETTER TO 911 SERVICE PROVIDER

DATE

Mr. Peter Bahr
Product Manager
Verizon Business
125 High Street
Oliver Tower, Floor 2, Room 2037
Boston, MA 02110

Dear Mr. Bahr:

This letter is to inform you that SBC Long Distance, LLC d/b/a AT&T Long Distance ("SBCLD") intends to discontinue offering Business Local Service to ninety-six (96) customers in New York beginning March 17, 2008.

At this time, SBCLD will continue to provide local service to a limited number of remaining business customers.

The ninety-six business customers will be notified by mail of this action and will be given an opportunity to select another carrier on an individual basis. There will not be a "mass" migration to a single, acquiring carrier. Instead, we will release each customer's record from the 911 database as that customer switches to another carrier so that the new carrier can initiate a routine migration of that specific customer's record.

SBC Long Distance will perform its due diligence to ensure that the customers will not experience any disruption in their 9-1-1 service. SBCLD will follow the appropriate industry standards and guidelines as it relates to providing 911 service and 9-1-1 database management, if and when these customers decide to move to a new service provider.

Thank you,