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1919 Pennsylvania Avenue NW
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Michael C. Sloan
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February 7, 2018

Via Electronic and Overnight Delivery

Chairman, Tennessee Public Utility Commission
c/o Sharla Dillon, Dockets and Records Manager
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

RE: Docket No. 98-0059
ALEC LLC Notice of Discontinuance Application Filed with the FCC and Request to Cancel Certificate

Dear Ms. Dillon:

ALEC LLC ("ALEC") (CLEC ID No. 128220), through counsel, hereby provides notice to the Commission of its intent to discontinue the provision of telecommunications services effective March 31, 2018, or as soon as all regulatory approvals have been obtained.

Accordingly, ALEC requests cancellation of its Certificate of Convenience and Necessity ("CCN") no later than March 31, 2018. No consumers will be impacted by this discontinuance as ALEC has no end-user customers. Its only customer is an affiliate whom it serves on a wholesale basis. A copy of the notice provided to the ALEC's customer is attached hereto as Exhibit A.

In support of this filing, ALEC submits the following information:

I. Request to Cancel Certificate

ALEC was granted a CCN to provide intrastate Telecommunications Services in Tennessee on May 11, 1999 in Docket No. 98-00599. ALEC respectfully requests that the Commission cancel its CCN as well as any tariffs that may be on file.

II. Customer Notice

ALEC is an exclusively wholesale service provider and its only customers is an internal affiliate. Notice has been provided to that customer, which has made alternative arrangements for service. A copy of the Notice is attached as Exhibit A. No end-user customers will be impacted by this discontinuance.

III. Notice of FCC Discontinuance Filing

ALEC has filed an application with the FCC under 47 C.F.R. § 63.71 to discontinue the domestic interstate services provided as part of its service offering. A copy of that Application (as supplemented) is attached as Exhibit B. This pleading is intended to constitute notice of and service on the Commission of ALEC's Section 63.71 filing of as required by 47 C.F.R. § 63.71(a).

WHEREFORE,

ALEC respectfully requests that its CCN be cancelled and that the Commission take all other appropriate action to effectuate this request.

This Application is being electronically filed with the Commission via e-mail sent to tpuc.docketroom@tn.gov. An original and five copies are enclosed for filing. Please acknowledge receipt of this filing by date-stamping the extra copy and returning it to me in the enclosed self-addressed envelope. Please do not hesitate to contact me if you have any questions about this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael C. Sloan". The signature is fluid and cursive, with the first name "Michael" and last name "Sloan" clearly legible.

Michael C. Sloan
Counsel to ALEC, LLC

Exhibit A

ALEC LLC

February 6, 2018

HAND DELIVERED

Todd Zittrouer
Momentum Telecom, Inc.
880 Montclair Road, Suite 400
Birmingham, AL 35213

Dear Todd:

This is an important notice that affects the access and local termination telecommunications services that you receive from ALEC, LLC (“ALEC”) in one or more of the following states: Alabama, Arkansas, Florida, Georgia, Idaho, Illinois, Kentucky, Louisiana, Mississippi, Nevada, North Carolina, Ohio, South Carolina, Tennessee, Texas, and Wisconsin.

I regret to inform you ALEC is planning to discontinue all of its service offerings effective March 30, 2018. As a result, you will have to choose a new provider (or providers) for these services.

This discontinuance is subject to approval by the Federal Communications Commission (FCC) and, in some cases, the state public utility commission in which service is provided. 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. 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 ALEC, 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 regarding the discontinuance of ALEC's local telephone service, please do not hesitate to contact me at (859) 721-4224.

Respectfully,

Mark Hayes

ALEC LLC

Exhibit B

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

<i>In the Matter of</i>)	
)	
Section 63.71 Application of)	WC Docket No. _____
)	
ALEC, LLC)	
)	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 ALEC, LLC

ALEC, LLC (“ALEC”) applies for authority under Section 214(a) of the Communications Act, as amended (“the Act”)¹, and Section 63.71 of the Commission’s rules,² to discontinue ALEC’s provision of interstate access service in Alabama, Arkansas, Florida, Georgia, Idaho, Illinois, Kentucky, Louisiana, Mississippi, Nevada, North Carolina, Ohio, South Carolina, Tennessee, Texas, and Wisconsin.

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

1. *Name and Corporate Headquarters Address of Carrier*

ALEC, LLC
250 W. Main Street, Suite 1920
Lexington, KY 40507

¹ 47 U.S.C. § 214.

² 47 CFR § 63.71.

Correspondence concerning this Application should be sent to:

Michael C. Sloan
Davis Wright Tremaine LLP
1919 Pennsylvania Ave. NW
Suite 800
Washington, DC 20006-3401
Telephone: 202.973.4227
Fax: 202.973.4427
Email: michaelsloan@dwt.com

2. *Date of Planned Service Discontinuance:*

ALEC plans to discontinue the services that are the subject of this Application on or about March 31, 2018, pending federal and state regulatory approval.

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

ALEC proposes to discontinue providing service in the following jurisdictions: Alabama, Arkansas, Florida, Georgia, Idaho, Illinois, Kentucky, Louisiana, Mississippi, Nevada, North Carolina, Ohio, South Carolina, Tennessee, Texas, and Wisconsin. If the Application is granted, ALEC will no longer provide service anywhere in the United States.

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

ALEC proposes to discontinue its terminating access service that it provides to its only customer, Momentum Telecom, Inc. (“Momentum”), an affiliate of ALEC, in the locations described above. To the extent necessary, Momentum will purchase services previously provided by ALEC from third-parties.

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

ALEC understands that Section 63.71(a) of the Commission’s rules requires that ALEC provide written customer notice of the planned discontinuance of the affected services.³ However, since ALEC’s only customer is Momentum, which is also an affiliate of ALEC, ALEC

³ 47 CFR § 63.71(a).

requests that the Commission waive the requirement to provide written customer notice of the planned discontinuance. Momentum is fully aware of the discontinuance. In fact, the actions of Momentum are the cause of ALEC's proposed discontinuance.

6. *Whether the Carrier is Considered Dominant or Non-dominant with Respect to the Service to be Discontinued.*

ALEC is considered non-dominant in all locations it serves with respect to the service that will be discontinued.

7. *Other Information.*

In accordance with Section 63.71(a) of the Commission's rules,⁴ a copy of this Application is being mailed concurrently with its filing to the entities listed on the attached certificate of service.

Conclusion

The public convenience and necessity will not be adversely affected by the discontinuance of the services described herein. ALEC's only customer, an affiliate, has advance notice of the proposed discontinuance and has access to several readily available substitute services. Therefore, ALEC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the affected service.

Respectfully Submitted,

/s/ *Michael C. Sloan*

Michael C. Sloan
Davis Wright Tremaine LLP
1919 Pennsylvania Ave., NW
Washington, DC 20006

Counsel to ALEC, LLC

January 30, 2018

⁴ *See id.*

CERTIFICATE OF SERVICE

I, Christopher Cook, do hereby certify on this 30th day of January, 2018 that a true and correct copy of the foregoing "Section 63.71 Application of ALEC, LLC" has been sent via U.S. mail, postage prepaid to the following:

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

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

Alabama Public Service Commission
100 North Union Street, Suite 850
Montgomery, AL 36104

Office of the Governor
500 Woodlane Street
Little Rock, AR 72201

Arkansas Public Service Commission
1000 Center Building
Little Rock, AR 72201

Office of the Governor
The Capitol
400 South Monroe Street
Tallahassee, FL 32399

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

Office of the Governor
206 Washington Street
111 State Capitol
Atlanta, GA 30334

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

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

Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83720

Office of the Governor
207 State House
Springfield, IL 62706

Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Office of the Governor
700 Capital Avenue, Suite 100
Frankfort, KY 40601

Kentucky Public Service Commission
2011 Sower Boulevard
Frankfort, KY 40601

Office of the Governor
P.O. Box 94004
Baton Rouge, LA 70804

Louisiana Public Service Commission
602 North Fifth Street
P.O. Box 91154
Baton Rouge, LA 70821

Office of the Governor
P.O. Box 139
Jackson, MS 39205

Mississippi Public Service Commission
501 North West Street
Woolfolk State Office Bldg.
Jackson, MS 39201

Office of the Governor
State Capitol Building
101 North Carson Street
Carson City, NV 89701

Nevada Public Utilities Commission
1150 East William Street
Carson City, NV 89701

Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699

North Carolina Utilities Commission
430 North Salisbury Street
Raleigh, NC 27603

Office of the Governor
Riffe Center, 30th Floor
77 South High Street
Columbus, OH 43215

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

Office of the Governor
1205 Pendleton Street
Columbia, SC 29201

South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29201

Office of the Governor
1st Floor, State Capitol
Nashville, TN 37243

Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

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

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

Office of the Governor
115 East Capitol
Madison, WI 53702

Public Service Commission of Wisconsin
601 North Whitney Way
Madison, WI 53705

/s/ Christopher Cook
Christopher Cook

For assistance with using ECFS, please contact the ECFS Help Desk at 202-418-0193 (tel:+12024180193) or via email at ECFSHelp@fcc.gov (mailto:ECFSHelp@fcc.gov).

Non-Docketed Filing

1 **Filing** 2 **Review** 3 **Confirmation**

FCC Inbox:	INBOX-63.71 : Section 214 Domestic Discontinuance Application
Confirmation #:	20180130962420708
Submitted:	Jan 30, 2018 12:26:12 PM
Status:	RECEIVED
Name(s) of Filer(s)	ALEC, LLC
Law Firm(s)	Davis Wright Tremaine LLP
Attorney/Author Name(s)	Michael C. Sloan
Primary Contact Email	christophercook@dwt.com
Type of Filing	APPLICATION
Address of	Law Firm
Address	1919 Pennsylvania Ave. NW Suite 800, Washington, DC, 20006
Email Confirmation	Yes

For assistance with using ECFS, please contact the ECFS Help Desk at 202-418-0193 (tel:+12024180193) or via email at ECFSHelp@fcc.gov (mailto:ECFSHelp@fcc.gov).

Federal Communications Commission
445 12th Street SW, Washington, DC 20554
Phone: 1-888-225-5322
TTY: 1-888-835-5322
Videophone: 1-844-432-2275
Fax: 1-866-418-0232

Contact Us (<https://www.fcc.gov/contact-us>)

VIA ECFS

February 7, 2018

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

RE: Supplement to Section 63.71 Application of ALEC, LLC

Dear Ms. Dortch:

ALEC LLC (“ALEC”), through undersigned counsel, hereby supplements its Section 63.71 Application (“Application”) filed with the Commission on January 30, 2018.¹ In order to complete the Application, pursuant to the requirements in Section 63.71(a) of the Commission’s rules,² ALEC submits the attached customer notice letter stating that service will be discontinued.

In the Application, ALEC requests authority pursuant to Section 214(a) of the Communications Act to discontinue ALEC’s provision of service in Alabama, Arkansas, Florida, Georgia, Idaho, Illinois, Kentucky, Louisiana, Mississippi, Nevada, North Carolina, Ohio, South Carolina, Tennessee, Texas, and Wisconsin. ALEC notes that it only has a single customer, Momentum Telecom, Inc. (“Momentum”), an affiliate of ALEC, in the locations described above. Pursuant to Section 63.71(a) of the Commission’s rules,³ the attached document provides the necessary notice to Momentum that ALEC will be discontinuing its service.

Questions or inquiries regarding this supplement to the Application may be directed to the undersigned.

Respectfully submitted,



Michael C. Sloan
Counsel to ALEC LLC

¹ *Section 63.71 Application of ALEC, LLC*, WC Docket No. ____ (filed on Jan. 30, 2018).

² 47 CFR § 63.71(a).

³ *Id.*

ALEC LLC

February 6, 2018

HAND DELIVERED

Todd Zittrouer
Momentum Telecom, Inc.
880 Montclair Road, Suite 400
Birmingham, AL 35213

Dear Todd:

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I regret to inform you ALEC is planning to discontinue all of its service offerings effective March 30, 2018. As a result, you will have to choose a new provider (or providers) for these services.

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If you have any questions regarding the discontinuance of ALEC's local telephone service, please do not hesitate to contact me at (859) 721-4224.

Respectfully,

Mark Hayes

ALEC LLC

For assistance with using ECFS, please contact the ECFS Help Desk at 202-418-0193 (tel:+12024180193) or via email at ECFSHelp@fcc.gov (mailto:ECFSHelp@fcc.gov).

Non-Docketed Filing

1 **Filing** 2 **Review** 3 **Confirmation**

FCC Inbox:	INBOX-63.71 : Section 214 Domestic Discontinuance Application
Confirmation #:	20180207284947240
Submitted:	Feb 7, 2018 10:34:19 AM
Status:	RECEIVED
Name(s) of Filer(s)	ALEC, LLC
Law Firm(s)	Davis Wright Tremaine LLP
Attorney/Author Name(s)	Michael C. Sloan
Primary Contact Email	christophercook@dwt.com
Type of Filing	OTHER
Address of	Law Firm
Address	1919 Pennsylvania Ave. NW Suite 800, Washington, DC, 20003
Email Confirmation	Yes

For assistance with using ECFS, please contact the ECFS Help Desk at 202-418-0193 (tel:+12024180193) or via email at ECFSHelp@fcc.gov (mailto:ECFSHelp@fcc.gov).

Federal Communications Commission
445 12th Street SW, Washington, DC 20554
Phone: 1-888-225-5322
TTY: 1-888-835-5322
Videophone: 1-844-432-2275
Fax: 1-866-418-0232

Contact Us (<https://www.fcc.gov/contact-us>)