

Morgan Lewis

Catherine G. Vasudevan
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July 19, 2024

Via E-Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Application of ANPI Business, LLC for Approval to Discontinue Switchless Long Distance and Toll-Free Services

Dear Secretary Chiavetta:

On behalf of ANPI Business, LLC, enclosed for filing with the Pennsylvania Public Utility Commission is the above-referenced Application. The filing fee in the amount of \$350.00 is being remitted electronically via credit card.

Please acknowledge receipt and acceptance of this filing. Should you have any questions concerning this filing, please contact Brett Ferenchak at brett.ferenchak@morganlewis.com.

Respectfully submitted,

/s/Catherine G. Vasudevan

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of

ANPI Business, LLC

for Approval to Discontinue Switchless Long
Distance and Toll-Free Services

Docket No. _____

ANPI Business, LLC (“ANPI-Biz” or “Applicant”), to the extent necessary pursuant to Section 1102(a) of the Public Utility Code, 66 Pa.C.S. § 1102(a), seeks Commission approval or other authority as may be required so that ANPI-Biz can discontinue switchless long distance and toll-free services that it provides to certain business end user customers (the “Services”) on August 31, 2024.

Applicant submits that the approval requested by this Application is in the public interest and should be granted on an expedited basis. Applicant is discontinuing its Services because the servers used to support the Services are at their end of life and no longer supported by their manufacturer and therefore must be decommissioned by August 31, 2024. Applicant therefore requests that the Commission consider this Application no later than August 31, 2024.

In support of this Application, Applicant provides the following information:

I. DESCRIPTION OF THE APPLICANT

ANPI-Biz, a Delaware limited liability company, has its principal office at One North Wacker Drive, Suite 2500, Chicago, IL 60606. ANPI-Biz provides wholesale and retail interexchange service throughout the U.S., and is authorized to provide competitive local exchange service in a limited number of states. In Pennsylvania, ANPI-Biz is authorized to: (1) provide interexchange telecommunications services as a toll reseller pursuant to a Certificate issued in Docket No. A-311006; and (2) operate as a competitive local exchange carrier pursuant to

Certificate issued in Docket No. A-311006 F0002 (the “Certificates”).¹ ANPI-Biz is also authorized by the Federal Communications Commission (“FCC”) to provide interstate and international telecommunications services.

II. DESCRIPTION OF THE DISCONTINUANCE

Applicant seeks approval to discontinue the provision of switchless long distance and toll-free services provided to business customers that were originally provided by Applicant’s predecessor-in-interest, Zone Telecom, Inc. (“Zone Telecom”). Applicant is discontinuing its Services because the servers used to support the Services are at their end of life and no longer supported by their manufacturer and therefore must be decommissioned by August 31, 2024.

This discontinuance will affect approximately four customers in Pennsylvania. ANPI-Biz will continue to provide interexchange and local exchange services to other customers. Therefore, ANPI-Biz does not seek to surrender its Certificates.

All of the affected customers received notice in compliance with the rules of this Commission and the FCC. Specifically, Applicant sent notice of the discontinuance to all affected customers on June 6, 2024. A sample of the initial letter that was sent to customers is attached hereto as **Exhibit A**.

ANPI-Biz plans to discontinue the Service as of August 31, 2024, or as soon thereafter as regulatory approvals are obtained. As previously stated, the Applicant’s servers used to support the service are at their end of life and no longer supported by their manufacturer and therefore must be decommissioned by August 31, 2024. Therefore, it is critical that this Application be approved to allow the Applicant to discontinue the Services as of August 31, 2024.

¹ The Certificates were originally granted in the name of Zone Telecom, Inc., which subsequently converted to a limited liability company known as Zone Telecom, LLC. *See* Docket No. A-2010-2206180. In 2013, Zone Telecom, LLC changed its name to ANPI Business, LLC.

III. DESIGNATED CONTACTS

Questions or any correspondence, orders or other materials pertaining to this filing should be directed to the following:

Catherine G. Vasudevan
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Morgan, Lewis & Bockius LLP
2222 Market St.
Philadelphia, PA 19103-2921
215-963-5000 (tel)
215-963-5001 (fax)
catherine.vasudevan@morganlewis.com

With copies to:

Ronald W. Del Sesto
Brett P. Ferenchak
Niki Wasserman
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave, N.W.
Washington, DC 20004-2541
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202-739-3001 (fax)
ronald.delsesto@morganlewis.com
brett.ferenchak@morganlewis.com
niki.wasserman@morganlewis.com

And:

Attn: Legal Department
ANPI Business, LLC
One North Wacker Drive, Suite 2500
Chicago, IL 60606
iq-legalnotices@sinch.com

IV. PUBLIC INTEREST CONSIDERATIONS

The discontinuance of the Services is not only necessary and appropriate due to the decommissioning of the outdated servers supporting the Services but will also not adversely affect the public convenience and necessity. The public will not be harmed by the discontinuance because customers have been given prior notice of the discontinuance along with guidance on timing of seeking out a new service provider. The Services that are being discontinued are also readily available from other carriers, including Applicant's affiliates, and Applicant will work with customers to transition them to other carriers' services if requested to do so. Applicant is a non-dominant carrier with respect to the services to be discontinued. Applicant believes that the proposed discontinuance is reasonable and necessary. Applicant will take all reasonable steps, to the extent it is able, to assure that the discontinuance of services is not unduly disruptive to the present or future public convenience or necessity.

V. **CONCLUSION**

WHEREFORE, for the reasons set forth above, Applicant requests the Commission grant all authority necessary to discontinue the Services.

Respectfully submitted,

/s/Catherine G. Vasudevan
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Counsel for Applicant

Dated: July 19, 2024

EXHIBIT A

Customer Notice



**NOTICE OF DISCONTINUANCE OF
SWITCHLESS LONG DISTANCE AND TOLL FREE SERVICES
DO NOT DISREGARD THIS NOTICE**

June 6, 2024

RE: Account #[Customer Acct # here]

Dear Customer,

Regrettably, ANPI Business, LLC f/k/a Zone Telecom Inc. (“Carrier”) plans to discontinue its intrastate, interstate and international switchless long distance and toll free service (the “Services”)¹ on August 31, 2024, subject to regulatory approval (the “Discontinuance Date”) because the platform that Carrier uses to provide those services is at its end of life and must be retired. Since as of the Discontinuance Date Carrier will no longer provide the Services to you, please immediately take action to contact a new service provider for your long distance or toll-free service before August 31, 2024. We urge you not to delay in arranging for a new long distance or toll-free service provider, as some providers may require several days or weeks to initiate new services. If you are not certain of your options for obtaining replacement service, you should check the list of providers maintained by the Public Utilities Commission in your state.

Please be aware that you are responsible for paying for all Services provided to you by Carrier during the transition. You may be subject to suspension or termination of your Services in accordance with applicable contracts, tariffs, and rules if you fail to pay your bills. **So that we stop sending you invoices, please let us know as soon as you have switched to a new provider of these services by sending an email to clientservices@voice.sinch.com. You also may terminate your service, without penalty, by contacting us at clientservices@voice.sinch.com.**

The Federal Communications Commission (“FCC”) permits customers to object to discontinuance of their service by a telecommunications provider. As provided in the FCC’s rule 47 CFR 63.71:

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 ANPI Business, 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 concerns, you may also contact Public Utilities Commission in your state.

Carrier is pleased to have had the opportunity to serve you for many years and remains committed to making your transition to a new provider as smooth as possible. If you have any questions regarding the discontinuance of your long distance or toll free services, please contact Customer Service at clientservices@voice.sinch.com or 866-629-8200.

Sincerely,

ANPI Business, LLC
One North Wacker Drive, Suite 2500
Chicago, IL 60606

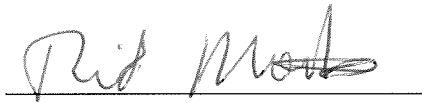
¹ This discontinuance affects customers in the following 23 states: Arizona, California, Colorado, Florida, Georgia, Illinois, Kansas, Maryland, Maine, Michigan, Minnesota, Missouri, North Carolina, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Virginia and Wisconsin.

VERIFICATION

I, Richard Monto, state that I am General Counsel of ANPI Business, LLC (“ANPI-Biz”), that I am authorized to make this Verification on behalf of ANPI-Biz, that the foregoing filing was prepared under my direction and supervision, and that the contents are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to un-sworn falsification to authorities)

I declare under penalty of perjury that the foregoing is true and correct.

Executed July 16, 2024.

A handwritten signature in cursive script, appearing to read "Richard Monto", is written over a horizontal line.

Richard Monto
General Counsel
ANPI Business, LLC

CERTIFICATE OF SERVICE

I, M. Renee Britt, hereby certify that on this 19th day of July 2024, a true copy of the foregoing Application for Approval to Discontinue Switchless Long Distance and Toll-Free Services was served by first class, prepaid postage mail or email upon the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
ra-oca@paoca.org

Office of Small Business Advocate
555 Walnut Street
First Floor, Forum Place
Harrisburg, PA 17101
ra-sba@pa.gov

Office of Attorney General
Bureau of Consumer Protection
16th Floor, Strawberry Square
Harrisburg, PA 17120
info@attorneygeneral.gov

Alliston Kaster, Esq.
Bureau of Investigations & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov

Dated this 19th day of July 2024

/s/M. Renee Britt