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August 20, 2024

Via E-Filing

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

**Re: Docket No. A-2024-3050480
Application of ANPI Business LLP to Abandon Switchless Long Distance
and Toll-Free Services**

SUPPLEMENT

Dear Secretary Chiavetta:

Pursuant to a request from Staff of the Bureau of Fixed Utility Services, on behalf of ANPI Business, LLC, enclosed for filing with the Pennsylvania Public Utility Commission is an Application of ANPI Business, LLC for Approval of the Partial Discontinuance of Switchless and Toll-Free Services, as a Supplement to the initial Application for Approval to Discontinue Switchless Long Distance and Toll-Free Services filed with the Commission on July 19, 2024 and acknowledged on August 1, 2024.

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**

In Re: Application of ANPI Business, LLC for
Approval of the Partial Discontinuance of Switchless
Long Distance and Toll-Free Services

Docket No.
A-2024-3050480

To the Pennsylvania Public Utility Commission:

1. The name and address of applicant is:

ANPI Business, LLC (“ANPI-Biz” or “Applicant”)
One North Wacker Drive, Suite 2500,
Chicago, IL 60606

2. The name and address of applicant’s attorney is:

Catherine G. Vasudevan
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with copies to:

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3. Give a general description of the nature and character of the services rendered by the applicant.

ANPI-Biz provides wholesale and retail interexchange service throughout the United States, 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 As described below, Applicant does not seek to surrender these Certificates.

4. Provide a statement of change in service proposed by the company for which Commission approval is sought.

Applicant seeks approval to discontinue the provision of certain switchless long distance and toll-free services (the “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 three (3) to four (4) customers in Pennsylvania² that receive the Service. ANPI-Biz will continue to provide interexchange and local exchange services to other customers. Therefore, ANPI-Biz does not seek to surrender its Certificates.

5. Provide a summary of the revenue derived from the operation of the service sought to be discontinued, together with a statement of the expenses accruing from the maintenance of that service. This information may be furnished in detail and attached to the application.

The Pennsylvania revenue derived from operation of the Service is less than \$500 per month, and was less than \$250 in July 2024. As stated above, Applicant is discontinuing its Services because the servers used to support the Services are at their end of life, no longer supported by their manufacturer and must be decommissioned. Therefore, Applicant will no longer be able to maintain the Service regardless of expense.

The Services being discontinued by Applicant have not been offered to new customers for many years and Applicant does not offer an alternative retail service to new customers.

6. Approval of the application is necessary or proper for the following reasons:

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

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.

² Although the Application filed on July 19, 2024 indicated that there were four affected Pennsylvania customers, there were only three active Pennsylvania customers that used the Services in July.

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.

7. Provide a detailed explanation of why the company wishes to abandon its Certificate.

Not applicable. ANPI-Biz will continue to provide interexchange and local exchange services to other customers. Therefore, ANPI-Biz does not seek to abandon its Certificates.

8. Provide the number of customers served and date last served.

This discontinuance will affect approximately three customers in Pennsylvania.

9. What happened to these customers? Who is serving them now?

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, and reminder emails to all remaining customers on August 9, 2024. A sample of the initial letter that was sent to customers is attached hereto as **Exhibit A**. Applicant has also provided 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.

10. Are there any NXX Codes assigned to your company? If yes, how many?

Not applicable. The discontinuance does not affect local exchange service.

11. How are the NXX Codes affected by this abandonment?

Not applicable. The discontinuance does not affect local exchange service.

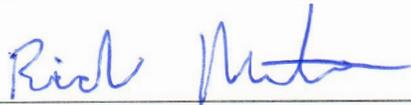
12. Has the company contacted NANPA regarding returning the NXX Codes?

Not applicable. The discontinuance does not affect local exchange service.

13. Has the company contacted the appropriate municipal/city authority of the abandonment for 911 purposes?

Not applicable. The discontinuance does not affect local exchange service.

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



(Signature of Applicant)

By: Richard Monto
General Counsel
ANPI Business, LLC

Exhibit A

Sample Customer Notice

Verification

I, Richard Monto, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief), and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

August 20, 2024

Date

Richard Monto

Signature

Certificate of Service

I, M. Renee Britt, hereby certify that I have on this day, the 20th day of August, 2024, served a true copy of the foregoing document(s) upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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

/s/ M. Renee Britt
Signature