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Electronic Filing

July 17, 2025

Matthew L. Homsher, Secretary,
Pennsylvania Public Utility Commission
400 North Street, Commonwealth Keystone Building
Second Floor – Room N201
Harrisburg, PA 17120

***Re: Application of AT&T Enterprises, LLC for approval of the
discontinuance of its AT&T Digital Link Service for business
customers***

Dear Secretary Homsher,

Attached for filing on behalf of AT&T Enterprises, LLC (“AT&T”) is a public and confidential version of the Application of AT&T for approval of the abandonment or discontinuance of AT&T Digital Link Services referenced above (“Application”), which includes its Plan for Abandonment (“Plan”).

AT&T requests that certain portions of its Application and Plan be given confidential treatment. The confidential version of this submission will only be filed and served on the Public Utility Commission. We will submit the required filing fee of \$350.00 (for an application for certificate amendment, pursuant to 52 Pa. Code §1.43) via electronic payment upon submission of the filing.

Consistent with the Commission’s instruction, the confidential version of this Application is being submitted to the Secretary by overnight delivery.

Please contact us if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Monaghan', is located below the 'Respectfully submitted,' text.

Joseph Monaghan
AVP, Senior Legal Counsel

Attachments
cc: Service List

**APPLICATION FOR APPROVAL OF ABANDONMENT OR
DISCONTINUANCE OF SERVICE, IN WHOLE OR IN PART**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of AT&T Enterprises, LLC for
approval of the abandonment or discontinuance
of its AT&T Digital Link Service
for business customers

Application
Docket No:

To Pennsylvania Public Utility Commission:

1. The name and address of applicant is:

AT&T Enterprises, LLC
208 S. Akard Street
Dallas, Texas 75202

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

Joseph Monaghan
AVP, Senior Legal Counsel
AT&T
1425 US Hwy 206
Bedminster, NJ 07921
jm242x@att.com

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

AT&T Enterprises, LLC ("AT&T" or "Applicant") currently provides intrastate and interstate telecommunications services, including both local and interexchange services to business customers in Pennsylvania and throughout the country.

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

AT&T proposes to discontinue providing its AT&T Digital Link Service ("ADL") to its business customers in Pennsylvania. AT&T Digital Link is a local exchange service which permits outward and inward local calling capability from a customer's premises utilizing Direct Outward Dialing (DOD), Direct Inward Dialing (DID) and Main Listed Number (MLN) over dedicated digital facilities and Originating Toll Free Service (8YY). As reflected in AT&T's Service Guide, since August, 2014, ADL has been grandfathered and not offered to new ADL customers.

- 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.**

See Proprietary Attachment B, the Confidential version of the Application.

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

AT&T is discontinuing its ADL service offering nationwide due to declining customer demand for this service and out of a desire to simplify and modernize its product portfolio. Due to the declining volumes and increases in maintenance and administrative costs, Applicant seeks to cease providing its AT&T ADL Service to business customers in Pennsylvania.

Of note, AT&T Digital Link Service is an intrastate local exchange service and no Section 214 application to the FCC was necessary in connection with the discontinuance of the ADL service offering.

The impacted business customers have been given ample notice of the planned discontinuance of this service. The initial notice was sent on or about September 16, 2024. A second notice, was sent to the remaining AT&T ADL customers on or about July 1, 2025.

Business customers have many different competitive options available to them in choosing a provider for their services and choosing among service offerings. Thus, Applicant's cessation of this service will not deprive the public of necessary telecommunications services. At the same time, it will facilitate Applicant's efforts to operate in the most efficient manner possible, to the ultimate benefit of Pennsylvania customers of AT&T's other telecommunications services.

Applicant will continue to provide other services in Pennsylvania to its business customers, including IP Toll Free Service or IP Flexible Reach Service as replacement products for AT&T Digital Link services. Applicant is not abandoning its CLEC certificate; AT&T will continue to offer other telecommunications services in the Commonwealth.

The grant of this Application will have no negative effect on the telecommunications market in Pennsylvania. Applicant is only one of many different providers of services in the Commonwealth. Indeed, AT&T operates primarily as a reseller of this service and replacement services are available from other carriers, including Verizon, as the incumbent local exchange carrier. In addition to voice services being offered by other certificated traditional wireline providers, businesses can look to cable companies, wireless companies, and Voice over Internet Protocol providers, including Applicant and affiliates of Applicant.

- 6. Provide a detailed explanation of why the company wishes to abandon its certificate.**

Applicant is not abandoning its certificate; AT&T will continue to serve business customers in Pennsylvania.

- 7. Provide the number of customers served and date last served.**

As of June 20, 2025, there are eleven (11) customers subscribed to AT&T ADL service in Pennsylvania.

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

Applicant continues to serve the eleven business customers still subscribing to this service. Much like those who have already canceled their AT&T Digital Link Service in recent years, AT&T expects that many of those customers will subscribe to alternative services, including the AT&T IP Toll Free Service or IP Flexible Reach Services that are being offered as a replacement product to those business customers impacted by the planned discontinuance of the AT&T Digital Link Service. The business customers impacted by this withdrawal of this service will have the choice of continuing the same or similar voice service from another provider, selecting a VoIP provider that would function over the customer's broadband connection, or selecting a wireless service provider.

As noted above, AT&T has provided notice to customers of the discontinuance of this service as follows:

- Customer Notice letters
 - First Notice was sent on or about September 16, 2024
 - Second Notice sent on or about July 1, 2025

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

Not applicable.

10. **How are the NXX Codes affected by this abandonment?**

Not applicable

11. **Has the company contacted NANPA regarding returning the NXX Codes?**

Not applicable.

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

AT&T operates primarily as a reseller of the impacted services and does not control those customer's telephone numbers in the E911 database. The Company will coordinate with its underlying carrier to ensure that the E911 service provider is given authorization to unlock any E911 records from the E911 database after the service is discontinued.

AT&T will continue to provide other services; thus, it is not abandoning the market for 911 purposes. To the extent necessary, AT&T will make appropriate notices with respect to the unlocking of any E911 records.



Joseph Monaghan
AVP, Senior Legal Counsel

Dated: July 17, 2025

AT&T ABANDONMENT PLAN FOR PARTIAL DISCONTINUATION OF SERVICE

Pursuant to 52 Pa. Code § 63.306(b), AT&T Enterprises, LLC (“AT&T” or “Applicant”) provides the following abandonment plan for the business customers affected by the discontinuance of its AT&T Digital Link Service.

(1) An identification of the telecommunications services, either facilities-based or through resale, to be abandoned or curtailed in the associated service territory.

AT&T proposes to discontinue providing AT&T Digital Link Service (“ADL”) to its business customers in Pennsylvania. AT&T Digital Link is a local exchange service which permits outward and inward local calling capability from a customer’s premises utilizing Direct Outward Dialing (DOD), Direct Inward Dialing (DID) and Main Listed Number (MLN) over dedicated digital facilities and Originating Toll Free Service (8YY). As reflected in AT&T’s Service Guide, since August, 2014, ADL has not been offered to new ADL customers. AT&T offers this service predominantly through resale or UNE-P using the underlying services of Verizon facilities.

(2) An explanation of reasons for the abandonment of service.

Applicant has experienced a decline in the number of business customers who choose to use a traditional services for voice communications. Most have moved to Voice over Internet Protocol (“VoIP”) or wireless services. Due to the declining volumes and increases in maintenance and administrative costs, Applicant seeks to cease providing its AT&T Digital Link to business customers in Pennsylvania. This is a trend throughout the country. The abandonment of this service will facilitate AT&T’s efforts to operate in the most efficient manner possible, to the ultimate benefit of Pennsylvania customers of our other services.

(3) A detailed outline of the procedures a LSP shall use to facilitate continuation of service for its affected customers. The abandoning LSP shall demonstrate that the abandonment will not deprive the public of necessary telecommunications services.

Written notice to customers as follows:

- **Customer Notice letters**
 - **First Notice sent on or about September 16, 2024**
 - **Second Notice sent on or about July 1, 2025**

Since August, 2014, no new customers have been permitted to order this service; and existing customers have not been able to renew service agreements or process any move, add, or change orders for this service. AT&T now seeks permission to take the next step in the process – the discontinuance of this business service to its eleven (11) remaining subscribers.

The grant of this Application will have no negative effect on the Pennsylvania telecommunications market. AT&T is providing ample notice to customers who may wish to switch to a different provider or a different service offered by AT&T. In addition to services being offered by the ILEC and other providers in Pennsylvania, services are provided by cable companies, wireless companies, and Voice over Internet Protocol (“VoIP”) providers. Therefore, the business customers who currently subscribe to this service have many different competitive options available to them in choosing a provider for their services. Thus, the abandonment of this service will not deprive the public of necessary telecommunications services.

(4) The notices required by 52 Pa. Code § 63.306.

AT&T will provide written notice to the ILECs, which have provided resold telecommunications services to Applicant that are the subject of its abandonment application. At least thirty (30) days prior to discontinuing this service, AT&T will send letters to Verizon authorizing the unlocking by the appropriate 9-1-1/E-9-1-1 service provider of any remaining 9-1-1/E-9-1-1 records after it has discontinued the service. AT&T will continue to offer other services and has no unused numbering resources to release in connection with this abandonment.

(5) A list of current customers that will be abandoned.

A list of impacted customers is being submitted as Confidential Attachment C.

(6) The abandonment notice that is to be sent to customers.

Attached as Attachment A is a template of the notice letter sent to impacted customers on or about July 1, 2025.

(7) The beginning and ending dates for the period in which customers are to shop and select a new LSP (customer choice period). Customers shall be allowed up to 20 calendar days after receiving a customer notice of abandonment to shop and select a new LSP.

The first customer notice was mailed on or about September 16, 2024, more than a year prior to the proposed discontinuance date of October 1, 2025. This early notice, and subsequent final notice sent on or about July 1, 2025, allows the impacted business customers ample time to shop for and select a new local service provider or new service, including an alternative service offered by AT&T.

(8) The beginning and ending dates for the customer migration period when the business arrangements are to be completed for the transfer of service to the new LSP. The customer migration period shall immediately follow the customer choice period, allow 10 calendar days for migration, and immediately precede the exit date.

There is no arrangement for the transfer of service to a new provider. If a customer places an order to subscribe to a replacement AT&T service prior to the disconnection date, AT&T will process that order

prior to discontinuing AT&T Digital Link Service to that customer. Likewise, if a customer places an order to transfer to a new provider prior to the proposed disconnection date, AT&T will complete the migration at the time of the new order.

(9) A proposed exit date. If the abandonment is initiated by termination by a NSP or by Commission order, the proposed exit date may not be later than the termination date provided by the NSP or the date the certificate of public convenience is to be revoked.

October 1, 2025.

(10) Contact names and telephone numbers for a LSP's program manager, the regulatory contact and other pertinent contacts, for example, the contact for customer service records (CSR) or provisioning contacts.

Program manager:

**Steve Sims
AT&T
(678) 446-8850
ss1075@att.com**

Regulatory contact:

**RuthAnn
Brazill
AT&T
(914) 672-5043
rbrazill@att.com**

(11) If applicable, the arrangements made for an acquiring carrier.

Not applicable. There is no agreement with an acquiring carrier.

(12) The procedures to be taken with NANPA to transfer NXX codes or thousand number blocks (if applicable) while preserving number portability for numbers within the code.

Not applicable.

(13) The name of the NSP and the current customer serving arrangements, for example, UNE-P, resale, UNE-L or Full Facilities.

There is no acquiring provider. Current customer serving arrangements are via Resale or UNE -P services obtained from Verizon.

(14) A list of customer names and contact information when the abandoning LSP is the only provider of facilities to a customer or group of customers.

Not applicable.

(15) The number of customers to be impacted by the abandonment.

As of June 20, 2025, there are 11 customers subscribed to the business service sought to be discontinued by Applicant.

(16) The details of a transfer of assets or control that requires Commission approval under 66 Pa.C.S. § 1102(a)(3) (relating to enumeration of acts requiring certificate).

Not applicable. There is no proposed transfer of assets or control. Also, AT&T will not be surrendering its CPCN with this action – it is still providing services to its business customers.

(17) A request to modify or cancel tariffs.

The Company will modify its applicable Service Guide to reflect the withdrawal of this service offering. AT&T Digital Link Service is not offered pursuant to tariff.

(18) A plan for processing customer deposits, credits and termination liabilities or penalties.

There are no customer deposits being held for the impacted services, and no termination fees will apply. To the extent the customer has a credit balance on their final bill, that amount will be refunded.

(19) A plan for unlocking the E-9-1-1 records.

As described above, AT&T predominantly operates as a reseller of the impacted services and does not control its resale customer's telephone numbers in the E911 database. The Company will provide notice to underlying carriers so that the E911 service provider may be given authorization to unlock any E911 records from the E911 database after the service is discontinued. AT&T will continue to provide other services; thus, it is not abandoning the market for 911 purposes.

(20) A plan for maintaining toll-free telephone access to an abandoning LSP's call center (including customer service and billing records) so that a customer is able to contact the LSP to inquire about or dispute final bills and refunds.

AT&T's Call Center will remain operational because Applicant will continue to provide other services.

VERIFICATION

I, RuthAnn Brazill, am authorized to and do make this Verification in support of the foregoing Application. I hereby state that the facts above set forth 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).

A handwritten signature in black ink that reads "RuthAnn Brazill". The signature is written in a cursive style with a large initial 'R' and 'B'.

AT&T Lead - Regulatory
rbrazill@att.com

Dated: July 17, 2025

**ATTACHMENT A
SAMPLE LETTERS**

July 1, 2025



[Date]

[Company Name]

ATTN: Telecommunications Manager

[Mail Address]

[Mail City, Mail State Mail Zip]

Important Notice Regarding AT&T Digital Link

AT&T Digital Link is being discontinued on October 1, 2025

Dear AT&T Customer,

To keep your business moving, we're always transforming our product line to provide you with the latest technology. As part of this transformation, we want to remind you that we are discontinuing AT&T Digital Link on October 1, 2025. We strongly encourage you to update to AT&T IP Toll Free (IPTF 360) as a replacement to avoid disruption.

We urge you to update now, as we will no longer support AT&T Digital Link as of October 1, 2025. AT&T IP Toll Free will provide many exciting benefits from the advanced capabilities that cloud-based or IP voice services can deliver, all with the same expert guidance, advice, and support you expect from us. Check out the benefits of AT&T IP Toll Free by visiting (<https://www.business.att.com/products/ip-toll-free.html>).

Please act now to avoid disruptions. We're here to help!

Your AT&T Service Representative will contact you to begin discussions regarding alternative solutions that meet your business communication needs. Additionally, you can call us at 877.508.0349 to schedule your update/upgrade/migration to AT&T IP Toll Free by October 1, 2025.

We know you have a lot of choices and look forward to serving your future business needs.

Sincerely,

AT&T Business Services

AT&T Corp.

208 S. Akard Street

Dallas, TX 75202

ATTACHMENT B - PROPRIETARY

CONFIDENTIAL

Attachment B Redacted as Confidential

ATTACHMENT C - PROPRIETARY

CONFIDENTIAL

Attachment C Redacted as Confidential

CERTIFICATE OF SERVICE

On this day 17 of July, 2025, I certify that a true and correct copy of the Application of AT&T Enterprises, LLC for approval of the abandonment or discontinuance of AT&T Digital Link Service for business customers has been served upon the following via First Class Mail:

Office of the Attorney General
Bureau of Consumer Protection
16th Floor, Strawberry Square
Harrisburg, PA 17120

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Dated this day 17 of July, 2025

A handwritten signature in black ink that reads "RuthAnn Brazill". The signature is written in a cursive, slightly slanted style.

RuthAnn Brazill
AT&T Lead - Regulatory
rbrazill@att.com