



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

December 13, 2019
Via Web Filing

Ms. Tonawa Troupe, Acting Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

**RE: Talk America Services, LLC
Application to Abandon Telecommunications Services
TRF Docket No. 90-9419 / Case No. 19-2142-TP-ABN**

Dear Ms. Troupe:

Please find the original of this letter, the Telecommunications Filing Form, and the Application to Abandon all Telecommunications Services submitted on behalf of Talk America Services, LLC ("Talk America Services" or "Company") to notify the Commission of the Company's intent to discontinue the provision of intrastate telephone services to all customers within the State of Ohio on January 23, 2020, subject to applicable regulatory approvals.

Talk America has provided the attached customer notice at least 30 days prior to the proposed January 23, 2020 discontinuance date and has established a dedicated toll-free customer service number to assist customers in transitioning their service to other providers. A copy of the notice is included as Attachment 1 to the enclosed Application. The Company respectfully requests that the Commission grant approval of the enclosed Application to Discontinue Telecommunication Services.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant

cc: Talk America - Talk America Services
tms: OHx1902

Enclosures
ST/cc

The Public Utilities Commission of Ohio
TELECOMMUNICATIONS FILING FORM
(Effective: 10-11-2017)

This form is intended to be used with most types of required filings. It provides check boxes with rule references for the most common types of filings. It does not replace or supersede Commission rules in any way.

In the Matter of the Application of Talk America Services, LLC) TRF Docket No. 90 - 9419
)
to Abandon All Services) Case No. 19 - 2142 - **TP - ABN**
) NOTE: Unless you have reserved a Case #, leave the
) "Case No" fields BLANK.

Name of Registrant(s) Talk America Services, LLC
DBA(s) of Registrant(s) N/A
Address of Registrant(s) 10802 Executive Center Drive, Benton Building, Suite 300, Little Rock, AR 72211
Company Web Address www.talkamericaservices.com
Regulatory Contact Person(s) Jeffrey R. Strenkowski Phone (501)-458-4397 Fax (501) 537-0769
Regulatory Contact Person's Email Address jeffrey.strenkowski@uniti.com
Contact Person for Annual Report Carly Fiola, Compliance Reporting Specialist Phone (407) 740-3010
Address (if different from above) 151 Southhall Lane, Suite 450, Maitland FL 32751
Consumer Contact Information James Severance, Director of Customer Care Phone (804-) 422-4729
Address (if different from above) 2134 W. Laburnum Ave., Richmond, VA 23227

Motion for protective order included with filing? ☐ Yes ☒ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: Waivers may toll any automatic timeframe.]

Notes:

Section I and II are Pursuant to Ohio Administrative Code 4901:1-6.

Section III – Carrier to Carrier is Pursuant to Ohio Adm.Code 4901:1-7, and Wireless is Pursuant to Ohio Adm.Code 4901:1-6-24.

Section IV – Attestation.

(1) Indicate the Carrier Type and the reason for submitting this form by checking the boxes below.

(2) For requirements for various applications, see the identified section of Ohio Adm.Code Chapter 4901 and/or the supplemental application form noted.

(3) Information regarding the number of copies required by the PUCO may be obtained from the PUCO's website at www.PUCO.ohio.gov under the docketing information system section, by calling the docketing division at 614-466-4095, or by visiting the docketing division at the offices of the PUCO.

(4) An Incumbent Local Exchange Carrier (ILEC) offering basic local exchange service (BLES) outside its traditional service area should choose CLEC designation when proposing to offer BLES outside its traditional service area or when proposing to make changes to that service.

All filings that result in a change to one or more tariff pages require, at a minimum, the following exhibits:

Exhibit	Description:
A	The tariff pages subject to the proposed change(s) as they exist before the change(s).
B	The tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.
C	A short description of the nature of the change(s), the intent of the change(s), and the customers affected.
D	A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

Section I – Part I - Common Filings

Carrier Type <input type="checkbox"/> Other (explain below)	For Profit ILEC	Not For Profit ILEC	CLEC
Change terms & conditions of existing BLES	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)
Introduce non-recurring charge, surcharge, or fee to BLES			<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)
Introduce or Increase Late Payment	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)
Revisions to BLES Cap	<input type="checkbox"/> ZTA <u>1-6-14(F)</u> (0 day Notice)		
Introduce BLES or expand local service area (calling area)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)
Notice of no obligation to construct facilities and provide BLES	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day Notice)	
Change BLES Rates	<input type="checkbox"/> TRF <u>1-6-14(F)</u> (0 day Notice)	<input type="checkbox"/> TRF <u>1-6-14(F)(4)</u> (0 day Notice)	<input type="checkbox"/> TRF <u>1-6-14(G)</u> (0 day Notice)
To obtain BLES pricing flexibility	<input type="checkbox"/> BLS <u>1-6-14(C)(1)(c)</u> (Auto 30 days)		
Change in boundary	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	
Expand service operation area			<input type="checkbox"/> TRF <u>1-6-08(G)(0 day)</u>
BLES withdrawal			<input type="checkbox"/> ZTA <u>1-6-25(B)</u> (0 day Notice)
Other* (explain)			

Section I – Part II – Customer Notification Offerings Pursuant to Chapter 4901:1-6-7 OAC

Type of Notice	Direct Mail	Bill Insert	Bill Notation	Electronic Mail
<input type="checkbox"/> 15-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> 30-day Notice	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Date Notice Sent: December 9, 2019				

Section I – Part III –IOS Offerings Pursuant to Chapter 4901:1-6-22 OAC

IOS	Introduce New	Tariff Change	Price Change	Withdraw
<input type="checkbox"/> IOS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section II – Part I – Carrier Certification - Pursuant to Chapter 4901:1-6-08, 09 & 10 OAC

Certification	ILEC (Out of territory)	CLEC	Telecommunications Service Provider Not Offering Local	CESTC	CETC
* See Supplemental form	<input type="checkbox"/> ACE <u>1-6-08</u> * (Auto 30- day)	<input type="checkbox"/> ACE <u>1-6-08</u> *(Auto 30 day)	<input type="checkbox"/> ACE <u>1-6-08</u> *(Auto 30 day)	<input type="checkbox"/> ACE <u>1-6-10</u> (Auto 30 day)	<input type="checkbox"/> UNC <u>1-6-09</u> *(Non-Auto)

*Supplemental Certification forms can be found on the PUCO webpage.

Section II – Part II – Certificate Status & Procedural

Certificate Status	ILEC	CLEC	Telecommunications Service Provider Not Offering Local
Abandon all Services		<input checked="" type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)	<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> ACO <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Merger *	<input type="checkbox"/> AMT <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> AMT <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)

* Other exhibits may be required under the applicable rule(s). ACN, ACO, AMT, ATC, ATR and CIO applications see the 4901:1-6-29 Filing Requirements on the PUCO's webpage for a complete list of exhibits.

Section III – Carrier to Carrier (Pursuant to 4901:1-7), and Wireless (Pursuant to 4901:1-6-24)

Carrier to Carrier	ILEC	CLEC
Interconnection agreement, or amendment to an approved agreement	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 day)	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)
Introduce or change c-t-c service tariffs	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 days)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC <u>1-7-04 or 05</u> (Non-Auto)	
Changes in rates, terms & conditions to Pole Attachment, Conduit Occupancy and Rights- of-Way. (13-579-AU-ORD 11/30/16 Entry)	<input type="checkbox"/> ATA <u>1-3-04</u> (Auto 60 days)	
Wireless Providers See <u>4901:1-6-24</u>	<input type="checkbox"/> RCC [Registration & Change in Operations] (0 day)	<input type="checkbox"/> NAG [Interconnection Agreement or Amendment] (Auto 90 days)

Section IV. – Attestation

Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.

AFFIDAVIT
Compliance with Commission Rules

I am an officer/agent of the applicant corporation, Talk America Services, , and am authorized to make this statement on its behalf.
Sharon Thomas, Consultant
(Name)

Please check ALL that apply:

☐ I attest that these tariffs comply with all applicable rules for the State of Ohio. I understand that tariff notification filings do not imply Commission approval and that the Commission's rules, as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the State of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the State of Ohio.

☒ I attest that customer notices accompanying this filing form were sent to affected customers, as specified in Section II, in accordance with Ohio Adm.Code 4901:1-6-7.

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

Executed on
(Date) December 12, 2019 at (Location) Maitland, FL

*Signature and
Title  CONSULTANT Date 12/12/19

**This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

VERIFICATION

I, , verify that I have utilized the Telecommunications Filing Form for most proceedings provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

*Signature and
Title  Consultant Date 12/12/19

**Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

File document electronically as directed in case number 06-900-AU-WVR
or

Send your completed Application Form, including all required attachments as well as the required number of copies, to:

Public Utilities Commission of Ohio
Attention: Docketing Division
180 East Broad Street, Columbus, OH 43215-3793

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Talk America Services, LLC)	Certificate No. 90-9419-TP-TRF
To Abandon the Provision)	
Of All Services)	Case No. 19-2142-TP-ABN

APPLICATION FOR ABANDONMENT

Pursuant to Ohio Administrative Code (OAC) 4901:1-6-26, Talk America Services, LLC (“Talk America Services” or “Company”), respectfully requests approval of this Application to Abandon the Provision of All Services, including local Exchange and Interexchange Telecommunications Services, in Ohio on January 23, 2020.

In support of this Application, Talk America Services provides the following information:

I. CONTACT INFORMATION

Questions and other correspondence regarding this Application should be sent to:

Sharon Thomas, Consultant to Talk America Services
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
Email: stthomas@inteserra.com

Name and corporate headquarters address of Applicant

Talk America Services, LLC
10802 Executive Center Drive
Little Rock, AR 72211

II. BACKGROUND

Talk America Services was granted a Certificate of Convenience and Necessity (“CCN”) to provide to Provide Intrastate Telecommunications Services in Ohio in Certificate Number: 90-9419-TP-TRF / Case Number 14-1439-TP-ACE on June 19, 2015. The Company currently serves 416 customers in Ohio, including 264 local customer and 152 long-distance only customers. The Company seeks to discontinue offering telecommunications services in Ohio and to discontinue service to all existing customers on January 23, 2020, pending required regulatory approvals.

III. REASON FOR DISCONTINUANCE AND CUSTOMER IMPACT

Talk America Services relies exclusively on an underlying provider to provide services. The underlying provider has notified Talk America Services that it will no longer provide or support these services. Consequently, Talk America Services must discontinue service to the affected customers. As described below, Talk America Services is providing all affected customers with ample notice of the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

The Company does not currently hold any customers deposits. It will prorate and refund any advance payments for service upon issuance of final customer invoices.

Talk America Services sent the customer notice included as Attachment 1 to all affected customers via U.S. 1st Class mail on December 9, 2019 and has established a dedicated toll-free customer service number with representatives available to assist customers in transitioning their service to other providers.

IV. CONCLUSION

Talk America Services, LLC respectfully requests that the Public Utilities Commission of Ohio approve its request to abandon the provision of all services, including local and long-distance services in Ohio, and cancel its tariffs, effective on or after January 23, 2020.

Attachment 1

Customer Notice



December 9, 2019

Customer Name
Customer Address
City, State Zip

URGENT: Your telephone services will be impacted unless you take action!

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the state of Ohio on or after January 23, 2020, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

It is important that you migrate the services you are receiving from Talk America Services to an alternative provider **before January 23, 2020** to avoid a **permanent disruption of your telephone services**. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers **before January 23, 2020**. You may find a list of alternative service providers in your telephone directory or via an online search. The Ohio Public Utilities Commission also maintains a list of regulated telephone companies on its website at <https://www.puco.ohio.gov/information-by-industry/telephone-consumer-information/>.

A filing is being made with the FCC for approval of this discontinuance of service. 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 Talk America Services, 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.

For additional assistance or questions, contact Talk America Services' customer service at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 2322. You may also contact the Ohio Public Utilities Commission toll free at 1-800-686-PUCO (7826) or by dialing 711 (TTY-TDD).

Sincerely,

Talk America Services, LLC

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/13/2019 9:53:24 AM

in

Case No(s). 19-2142-TP-ABN

Summary: Application Application to Abandon Telecommunications Services electronically
filed by Ms. Cynthia Cintron on behalf of Talk America Services, LLC