

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Section 63.71 Application of S&T
Communications, LLC

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) WC Docket No. 22-341
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AMENDED SECTION 63.71 APPLICATION

S&T Communications, LLC, (“Applicant”) seeks authorization, pursuant to Section 214(a) of the Communications Act of 1934, as amended, and 47 C.F.R. Section 63.71, to discontinue the provision of all domestic non-dominant telecommunications and interconnected VoIP services it provides over fixed wireless to certain customers in the State of Kansas as soon as Commission approval can be obtained.

Applicant provides the following information pursuant to Section 63.71 of the Commission’s Rules:

1. Name and Address of Carrier:

S&T Communications, LLC
P.O. Box 99
Brewster, KS 67732

2. Date of Planned Service Discontinuance, Reduction, or Impairment:

Customers that are currently subscribed to the Service were sent notice by U.S. mail on September 22, 2022, a copy of which is attached hereto as Amended Exhibit A. S&T will continue to work with each customer to ensure they have continuity of service and sufficient time to transition, up to 31 days after the FCC releases a public notice regarding the discontinuance.

3. Points of Geographic Areas of Service Affected:

The Affected Services (as defined below) that will be discontinued are provided in the State of Kansas. Specifically, the discontinuance will affect the following areas and localities in Kansas: Garden City, Sublette, Satanta, Leoti, and Coolidge.

4. Brief Description of Types of Service Affected:

Applicant plans to discontinue Voice over Internet Protocol (“VoIP”) services provided over fixed wireless (the “Affected Service”) technology.

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

On September 22, 2022, Applicant sent affected customers, approximately 25, written notice of the planned discontinuance in accordance with the requirements of Section 63.71(a) of the Commission’s Rules. A copy of the notice is appended hereto as Exhibit A. The notice was provided by email and First-Class U.S. mail.

A copy of this Amended Application has also been sent to the Kansas Corporation Commission, the Governor of Kansas and the Department of Defense, as required under Section 63.71, concurrent with this filing, as set forth in the attached Certificate of Service.

6. Non-Dominance of the Carrier with Respect to the Service to be Discontinued:

Applicant is non-dominant with respect to the Affected Services. This discontinuance should not be considered a technology transition as there is at least one provider such as Southwestern Bell Telephone Co, DBA AT&T, Consolidated Communications of Kansas CO., or Pioneer Telephone Assn. that will continue to offer telephony services to the affected territory.

7. Additional questions regarding this Application should be directed to:

Zack Odell
PO Box 99
Brewster, KS 67732
zack.odell@sttelcom.com

with a copy to:

Colleen Jamison
Jamison Law, LLC
PO Box 128
Tecumseh, KS 66542
colleen.jamison@jamisonlaw.legal

8. Circumstances of Discontinuance:

The business case to continue such services in Kansas has diminished given the time and financial impacts associated with establishing the requisite trunking capabilities to continue adequately serving the affected customers.

The affected customers will not be unduly affected because they have received ample notice of the discontinuance and have comparable service options from other providers serving these locations, including Southwestern Bell Telephone Co. Inc., d/b/a AT&T, Consolidated Communications of Kansas Co. Inc., or Pioneer Telephone Assn. Inc., the incumbent local exchange carrier whose facilities located in their respective areas are being used to serve the affected customers.

WHEREFORE, the public convenience and necessity will not be adversely affected by the proposed discontinuance of services described herein. Applicant has provided the requisite notice to all of its affected customers, which have access to several other substitute services. Accordingly, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U. S. C. Section 214, and Section 63.71 of the Commission's Rules, Applicant respectfully requests Commission approval of this Application.

Respectfully submitted,

By: /s/ Zack Odell
Zack Odell
Josh Cech
320 Brewster, KS | PO Box 99
Brewster, KS 67732
zack.odell@sttelcom.com
josh.cech@sttelcom.com

Dated: September 22, 2022

CERTIFICATE OF SERVICE

I, Zack Odell, certify that on the 22nd day of September 2022, the foregoing Amended Section 63.71 Application of S&T Communications, LLC. was sent via First-Class mail, postage prepaid, to the following entities listed below.

Gov. Laura Kelly
Kansas Office of the Governor
Capitol, 300 SW 10th Ave. Ste. 241S
Topeka, KS 66612-1590

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, D.C. 20301

/s/ Zack Odell

Amended Exhibit A

Customer Name
Address
City, State Zip Code

September 22, 2022

Dear Valued S&T Customer,

Since the beginning of this year, S&T has provided Voice over Internet Protocol (VoIP) phone service to your location. Due to a system change and to maintain safety and compliance standards, we are faced with the difficult decision to discontinue VoIP service for a small number of customers. Please accept this letter as notice of the services' discontinuation for your address. Subject to regulatory approvals, your VoIP phone service will no longer be available starting 31 days after the FCC releases a public notice regarding the discontinuance.

What do I need to do?

If you wish to keep your current phone number, you will need to engage a new provider and request to port your current number AS SOON AS POSSIBLE. We recommend removing the Cisco ATA (pictured below) from your network at your earliest convenience. To remove the device, unplug the internet cord that is plugged into the blue internet port of the Cisco ATA and plug it directly into the internet (WAN) port of your router. If you require assistance with this, please call 800-432-8294.



Why is this service being discontinued?

Due to a change in how we are delivering the service, we will be unable to provide required critical functionality for the ongoing operations of service at your location. This includes access to appropriate emergency services.

Who is impacted by this change?

The vast majority of S&T phone customers are not impacted by this change. Unfortunately, a handful of customers located in Garden City, Sublette, Satanta, Leoti, and Coolidge are ineligible to receive VoIP service after 31 days after the FCC releases a public notice regarding the discontinuance.

Sincerely,

Your Local S&T Team

¹ The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) 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 S&T Communications LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service."