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February 10, 2021

VIA ELECTRONIC FILING ONLY

The Honorable Aida Camacho-Welch, Secretary
State of New Jersey
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 350
Trenton, New Jersey 08625-0350
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Board.Secretary@bpu.nj.gov

Re: Motion of AT&T Corp. Regarding Non-Applicability of N.J.A.C 12:10-12.1 et seq. Mass Migration Rules

Dear Secretary Camacho-Welch:

Please accept this Letter Motion in lieu of a more formal motion requesting that the Board either not apply, or in the alternative waive its mass migration rules, found at N.J.A.C. 12:10-12.1 *et seq.*, with respect to AT&T Corp.'s ("AT&T's") plan to exit the landline residential telephone market on May 3, 2021. AT&T currently provides landline residential telephone services in the state by reselling Verizon's residential landline service. AT&T is in the process of exiting the resold residential landline services markets in New Jersey and other states where it resells these services; AT&T will continue to provide residential toll and long distance services, as well as business services in the state. Landline residential telephone service is a competitive service in New Jersey, and AT&T may exit this market upon thirty (30) days' notice to the Board. AT&T has not yet given formal notice to the Board, but intends to do so in March in conjunction with its FCC filing. AT&T has already commenced a reach-out campaign to its landline residential customers to advise of AT&T's exit plans, and to advise customers of their many options to replace their service, including procuring the landline services that Verizon and other companies provide.

The Board should not apply its mass migration rules to this planned market exit. AT&T is not "migrating" any customers – it is simply withdrawing its resold residential landline services. There is no sale or transfer of these customers to another entity, hence no "migration" of the customers to another company or platform. The customers will choose their own alternatives to their current services. Some may opt to cut the cord entirely and use only wireless services. Others may elect cable landline services or use another Internet-based landline

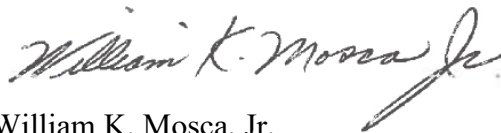
solution. There are a number of customer alternatives, but the key fact remains: there will be no migration of these customers within the letter or spirit of the regulations.

Should the Board believe that AT&T's contemplated exit implicates the mass migration rules, AT&T respectfully requests the Board to waive these rules. Customers are not being migrated anywhere – they must choose (consistent with the multiple options of competitive markets) the alternative that best suits their preferences. Application of the rules could only cause customer confusion – customers may believe that they are going to be migrated to a different carrier or platform, and that will not be the case. AT&T is in the process of clearly communicating that customers must take action to replace existing service with another alternative. Therefore, in order to help facilitate AT&T's orderly withdrawal from the residential resold landline market, the Board should find either that:

- (1) There is no "migration" of affected customers to another carrier or platform, and the mass migration rules do not apply; or
- (2) If the planned exit implicates the mass migration rules, there is ample reason to waive the rules and permit AT&T to proceed with its orderly exit as planned.

Thank you for your attention to this request. Please do not hesitate to contact me with any questions.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William K. Mosca, Jr.", with a stylized flourish at the end.

William K. Mosca, Jr.

Enclosures

cc: Lawanda Gilbert
Harold Bond
Carol Artale
Maria Novas-Ruiz, Esq.