April 4, 2025

Via Efile and
UPS Next Day

Georgia Public Service Commission
Attn: Sallie Tanner, Executive Secretary
244 Washington Street, SW
Atlanta Georgia, 30334-9052

Re: **Clarification regarding Courtesy Letter of Discontinuance of Voice Telecommunications Services**
Global Crossings Local Services Inc. Docket #8180, Document #221871
Global Crossing Telecommunications, Inc. Docket #6213, Document #221870

Dear Secretary Tanner:

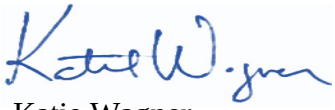
Global Crossings Local Services Inc. (CLEC) and Global Crossing Telecommunications, Inc. (IXC) sent a courtesy letter on February 27, 2025, notifying the Georgia PSC of planned discontinuance of voice services. In that letter neither entity requested to cancel their Certificates of Authority because: (a) Lumen's debt covenants require its subsidiaries to maintain certification, and (b) Global Crossings Local Services Inc. will continue to provide facilities-based switched access. For reference, I attach earlier emails related to not seeking cancelation but being advised to file a notification only via letter with the Commission (Attachment 1).

On March 18, 2025, the Commission entered Letter Orders in Docket #8180, document #221871 (Global Crossings Local Services Inc.) and Docket #6213, document #221870 (Global Crossing Telecommunications, Inc.) canceling each entities' respective Certificates of Authority, notwithstanding the fact that the February 27, 2025 letter from Global Crossings Local Services Inc. and Global Crossing Telecommunications, Inc. was titled "Courtesy Letter" and did not request any Commission action.

Because the intent of Global Crossing Local Services Inc. and Global Crossing Telecommunications, Inc. was simply to notify the Commission consistent with guidance received from Commission staff, I now respectfully request that new Letter Orders be entered into both dockets vacating both March 18, 2025 Letter Orders.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Katie Wagner
Senior Corporate Counsel

1 405-669-8712
Katie.wagner@lumen.com

Outlook

ATTACHMENT 1

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Hi Katie,

If the company is not canceling their certificate/s then is no need to file a cancellation request. However since the company is discontinuing voice service it is advised that you file a notification with the Commission via letter that the company/s are discontinuing voice services and also provide a copy of the 30 day notice that you provided to the affected customers.

Regards,

Erica Wilson

Telecommunications Analyst
Georgia Public Service Commission
1-800-282-5813 (toll free)
404-651-9402 (telephone)
770-342-3019 (fax)
ewilson@psc.ga.gov

ATTACHMENT 1

From: Wagner, Katie <Katie.Wagner@lumen.com>
Sent: Thursday, February 6, 2025 1:04 PM
To: Erica Wilson <ewilson@psc.ga.gov>
Cc: Herlth, Margie <Marjorie.Herlth@lumen.com>
Subject: RE: Cancelation Request

Hello Erica,

Following up on my question below.

Thank you so much,

Katie N. Wagner
Senior Corporate Counsel
State Regulatory Affairs
tel: 405-669-8712
katie.wagner@lumen.com

From: Wagner, Katie
Sent: Wednesday, February 5, 2025 12:54 PM
To: Erica Wilson <ewilson@psc.ga.gov>
Cc: Herlth, Margie <Marjorie.Herlth@lumen.com>
Subject: RE: Cancelation Request

Thanks Erica. Without a CPCN cancelation request, would it be appropriate then to simply notify customers 30 days before discontinuance and forgo the letter to the Executive Secretary?

Thanks,

Katie N. Wagner
Senior Corporate Counsel
State Regulatory Affairs
tel: 405-669-8712
katie.wagner@lumen.com

From: Erica Wilson <ewilson@psc.ga.gov>
Sent: Wednesday, February 5, 2025 12:51 PM
To: Wagner, Katie <Katie.Wagner@lumen.com>
Cc: Herlth, Margie <Marjorie.Herlth@lumen.com>
Subject: Re: Cancelation Request

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If they wish to keep their certificate then no cancelation request is necessary.

ATTACHMENT 1

Erica Wilson

Telecommunications Analyst
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From: Wagner, Katie <Katie.Wagner@lumen.com>
Sent: Wednesday, February 5, 2025 1:31:43 PM
To: Erica Wilson <ewilson@psc.ga.gov>
Cc: Herlth, Margie <Marjorie.Herlth@lumen.com>
Subject: RE: Cancelation Request

Thank you Erica. The telecom entity that will be discontinuing service is exiting only the voice telecom market but will continue to provide access services and will need to retain its CPCN. Does that change the application process at all on your end?

LUMEN

Katie N. Wagner
Senior Corporate Counsel
State Regulatory Affairs
tel: 405-669-8712
katie.wagner@lumen.com

From: Erica Wilson <ewilson@psc.ga.gov>
Sent: Wednesday, February 5, 2025 12:14 PM
To: Wagner, Katie <Katie.Wagner@lumen.com>
Subject: Re: Cancelation Request

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ATTACHMENT 1

Erica Wilson

Telecommunications Analyst

Georgia Public Service Commission

1-800-282-5813 (toll free)

404-651-9402 (telephone)

770-342-3019 (fax)

ewilson@psc.ga.gov

From: Erica Wilson
Sent: Wednesday, February 5, 2025 1:01 PM
To: katie.wagner@lumen.com <katie.wagner@lumen.com>
Subject: Cancelation Request

Hi Katie,

Per our recent conversation you will need to file a cancellation letter requesting cancellation of the companies telecommunications certificates. If the company has current customers please provide the 30 day Cancellation Notice provided to the customers. There is no formal form or authorization needed to cancel the certificates. You can address the letter to the executive secretary. Once received we will review the request and place it on the following agenda for approval.

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Regards,

Erica Wilson

Telecommunications Analyst

Georgia Public Service Commission

1-800-282-5813 (toll free)

404-651-9402 (telephone)

770-342-3019 (fax)

ewilson@psc.ga.gov

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