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Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

February 17, 2020
Via ECFS Filing

Legacy Long Distance International, Inc.
10833 Valley View Street Suite 150
Cypress, CA 90630

FRN: 0003725322

Secretary, Federal Communications Commission
Washington, DC 20554
ATTN: Wireline Competition Bureau

Enclosed please find the Application to Discontinue Service submitted on behalf of Legacy Long Distance International, Inc. dba Legacy Inmate Communications. This filing is made pursuant to Title 47, Section 63.71.

A copy of the Service List is provided as Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant

cc: Brian Hill - Legacy
tms: FCx2001

SW/mp

RECEIVED-FPSC
2020 FEB 24 AM 8:39
COMMISSION
CLERK

Margeaux Pennywell

From: no-reply@fcc.gov
Sent: Monday, February 17, 2020 4:15 PM
To: Margeaux Pennywell
Subject: FCC ECFS Filing Confirmation

Thank you for your submission to the FCC Electronic Comment Filing System (ECFS).
Please Note that your filing will not be available for searching until it has been reviewed and posted by the FCC.

Confirmation Number: 20200217114030316

Proceeding(s): INBOX-63.71 : Section 214 Domestic Discontinuance Application

Filer(s): Legacy Long Distance International, Inc.

Author(s): Sharon R. Warren

Law firm(s):

Type of Filing: APPLICATION

File Number:

Report Number:

Bureau ID Number:

Documents(s) Attached: FCC Legacy Discontinuance Application IXC and OSP 2020 as Filed.pdf

Address: 151 Southhall Lane Suite 450, Maitland, FL 32751

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

In the Matter of)
)
Section 63.71 Application of) WC Docket No. _____
)
Legacy Long Distance International, Inc.)
)
For Authority Pursuant to Section 214) File No. _____
of the Communications Act of 1934, As)
Amended, To Discontinue the Provision)
of Service)

Section 63.71 Application of Legacy Long Distance International, Inc.

Legacy Long Distance International, Inc. ("Legacy" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of interexchange and operator services in all 50 states.

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Legacy provides the following information pursuant to Section 63.71 of the Commission's rules:

1. *Name and corporate headquarters address of Carrier*

Legacy Long Distance International, Inc.
10833 Valley View Street
Suite 150
Cypress, CA 90830

Correspondence concerning this Application should be sent to:

Sharon R. Warren
Consultant to Legacy Long Distance International, Inc.
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3005
Facsimile: 407-740-0613
E-Mail: swarren@inteserra.com

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

Legacy proposes to discontinue the services that are the subject of this Application on or about March 16, 2020, pending required federal and state regulatory approval of the discontinuance.

3. *Points of Geographic Areas of Service Affected:*

Legacy will discontinue interexchange and operator services in all 50 states.

4. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

Legacy proposes to discontinue all interexchange and operator services in all 50 states. The services are being discontinued because Legacy has a very small base in the affected states and does not anticipate growth in customer base. Consequentially, it is not economically viable to continue to offer service in these states. As described below, Legacy is providing all affected customers with ample notice of the discontinuance.

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

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice for both interexchange and operator services were provided via bill insert, mail and/or e-mail to all affected customers on February 10, 2020. Both notices are attached as Exhibit A.

A copy of this Application is being sent to the state regulatory commissions and governors' offices in all affected states, as well as the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

Exhibit A
Customer Notice



10833 Valley View Street Suite 150, Cypress, CA 90630

February 10, 2020

URGENT: YOU MUST CHOOSE A NEW LONG DISTANCE TELEPHONE SERVICE PROVIDER!!

Dear Valued Customer,

Thank you for being a valued Legacy Long Distance International, Inc. dba Legacy Inmate Communications ("LLDI") customer. This letter is to inform you that LLDI will no longer be providing Long Distance service in any state or territory within the United States including the state(s) you currently operate on or after March 16, 2020.

YOUR ACTION IS REQUIRED!

Because LLDI will discontinue all Long Distance services in your area on or after March 16, 2020, you need to select a new telephone service provider as soon as possible if you wish to assure continuity of your service. You do have the option to purchase Long Distance services from other service providers in your area. To assist in this transition, we have identified AT&T as an alternative provider. Their contact information is:

AT&T

www.att.com

888-723-0669

Pending state and federal regulatory approvals where applicable, LLDI will be discontinuing all Long Distance services on or after March 16, 2020 in the following states: see Attachment A for list of states. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Legacy Inmate Communications at 1-877-553-4440 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. You will need to migrate the services you now receive from LLDI to an alternative provider **before March 16, 2020.**

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 Legacy Long Distance International, Inc. (DBA Legacy Inmate Communications). 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. Although we will no longer provide Long Distance services, we greatly appreciate your past business with us.

Legacy Inmate Communications' Customer Service can be reached at 1-877-553-4440 or info@legacyinmate.com or in writing at 10833 Valley View Street Suite 150, Cypress, CA 90630.

If you do not switch your LD service to another provider before March 16, 2020 your service will be terminated, and you may not be able to make Long Distance calls. **Please take action NOW to avoid interruption in your service.**

Sincerely,

Legacy Long Distance International, Inc. (DBA Legacy Inmate Communications)

Attachment A

Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
Florida
Georgia
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska
Nevada
New Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
Rhode Island
South Carolina
South Dakota
Tennessee
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming
The District of Columbia
All other US Territories



10833 Valley View Street Suite 150, Cypress, CA 90630

February 10, 2020

URGENT: YOU MUST CHOOSE A NEW LONG DISTANCE TELEPHONE SERVICE PROVIDER!!

Dear Valued Customer,

Thank you for being a valued Legacy Long Distance International, Inc. dba Legacy Inmate Communications ("LLDI") customer. This letter is to inform you that LLDI will no longer be providing Operator Services in any state or territory within the United States including the state(s) you currently operate on or after March 16, 2020.

YOUR ACTION IS REQUIRED!

Because LLDI will discontinue all Operator Services in your area on or after March 16, 2020, you need to select a new service provider as soon as possible if you wish to assure continuity of your service. To assist in this transition, we have identified CTI as an alternative provider. Their contact information is:

CTI
website@customteleconnect.com
www.customteleconnect.com
800-672-9080

Pending state and federal regulatory approvals where applicable, LLDI will be discontinuing all Operator services on or after March 16, 2020 in the following states: see Attachment A for list of states. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Legacy Inmate Communications at 1-877-553-4440 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. You will need to migrate the services you now receive from LLDI to an alternative provider **before March 16, 2020.**

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 Legacy Long Distance International, Inc. (DBA Legacy Inmate Communications). 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. Although we will no longer provide Operator services, we greatly appreciate your past business with us.

Legacy Inmate Communications' Customer Service can be reached at 1-877-553-4440 or info@legacyinmate.com or in writing at 10833 Valley View Street Suite 150, Cypress, CA 90630.

If you do not switch your Operator service to another provider before March 16, 2020 your service will be terminated, and your Operator service calls may not connect or process. **Please take action NOW to avoid interruption in your service.**

Sincerely,
Legacy Long Distance International, Inc. (DBA Legacy Inmate Communications)

Attachment A

Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
Florida
Georgia
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska
Nevada
New Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
Rhode Island
South Carolina
South Dakota
Tennessee
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming
The District of Columbia
All other US Territories

Exhibit B – Service List

| | |
|---|---|
| Alabama Public Service Commission 100 N. Union Street, Suite 950 Montgomery, AL 36130 | Office of Governor Kay Ivey State Capitol 600 Dexter Avenue Montgomery, AL 36130-2751 |
| Regulatory Commission of Alaska 701 West 8 th Avenue, Suite 300 Anchorage, AK 99501 | Office of Governor Mike Dunleavy State Capitol P.O. Box 110001 Juneau, AK 99811-0001 |
| Arizona Corporation Commission 1200 W. Washington Street Phoenix, AZ 85007 | Office of Governor Doug Ducey State Capitol 1700 West Washington Phoenix, AZ 85007 |
| Arkansas Public Service Commission 1000 Center Street Little Rock, AR 72203 | Office of Governor Asa Hutchinson State Capitol Room 250 Little Rock, AR 72201 |
| California Public Utilities Commission Telecommunications Division 505 Van Ness Avenue, 3 rd Floor San Francisco, CA 9402 | Office of Governor Gavin Newsom State Capitol Suite 1173 Sacramento, CA 95814 |
| Colorado Public Utilities Commission 1560 Broadway, Suite 250 Denver, CO 80202 | Office of Governor Jared Polis 136 State Capitol Denver, CO 80203-1792 |
| Connecticut Public Utilities Regulatory Authority 10 Franklin Square New Britain, CT 06051 | Office of Governor Ned Lamont 210 Capitol Avenue Hartford, CT 06106 |
| Delaware Public Service Commission 861 Silber Lake Blvd., Suite 100 Cannon Building Dover, DE 19904 | Office of Governor John Carney Legislative Hall Dover, DE 19901 |
| Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 | Office of Governor Ron DeSantis PL 05 The Capitol 400 South Monroe Street Tallahassee, FL 32399-0001 |
| Georgia public Service Commission 244 Washington Street SW Atlanta, GA 30334 | Office of Governor Brian Kemp 203 State Capitol Atlanta, GA 30334 |
| Hawaii Public Utilities Commission 465 S. King Street, Room 103 Honolulu, HI 968103 | Office of Governor David Ige Executive Chambers State Capitol Honolulu, HI 96813 |
| Idaho Public Utilities Commission 472 West Washington Statehouse Boise, ID 83720 | Office of Governor Brad Little 700 West Jefferson Second Floor Boise, ID 83702 |

Exhibit B – Service List, (Cont'd.)

| | |
|--|---|
| Illinois Commerce Commission 527 East Capitol Avenue Springfield, IL 62701 | Office of Governor JB Pritzker State Capitol 207 Statehouse Springfield, IL 62706 |
| Indiana Utility Regulatory Commission 101 West Washington Street Suite 1500 East Indianapolis, IN 46204 | Office of Governor Eric Holcomb State House Room 206 Indianapolis, IN 46204-2797 |
| Iowa Utilities Board 1375 e. Court Avenue, RM 69 Des Moines, IA 50319 | Office of Governor Kim Reynolds State Capitol 1007 East Grand Ave. Des Moines, Iowa 50319 |
| Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604 | Office of Governor Laura Kelly Capitol 300 SW 10th Avenue, Suite 212S Topeka, KS 66612-1590 |
| Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40602 | Office of Governor Andy Beshear 700 Capitol Ave., Suite 100 Frankfort, KY 40601 |
| Louisiana Public Service Commission Galvez Building 602 North 5 th Street, 12 th Floor Baton Rouge, LA 7082 | Office of Governor John Bel Edwards P. O. Box 94004 Baton Rouge, LA 70804-9004 |
| Maine Public Utilities Commission 101 Second Street Baltimore, MD 21202 | Office of Governor Janet Mills 1 State House Station Augusta, ME 04333 |
| Maryland Public Service Commission Telecommunications Division 6 St. Paul Street Baltimore, MD 21202 | Office of Governor Larry Hogan State House 100 State Circle Annapolis, MD 21401 |
| Massachusetts Department of Telecommunications & Cable (DTC) 1000 Washington Street, Suite 820 Boston, MA 02118 | Office of Governor Charlie Baker State House Office of the Governor, Room 360 Boston, MA 02133 |
| Michigan Public Service Commission 7109 W. Saginaw Highway Lansing, MI 48917 | Office of Governor Gretchen Whitmer P.O. Box 30013 Lansing, MI 48909 |
| Minnesota Public Utilities Commission 121 7 th Place East, Suite 350 St. Paul, MN 55101 | Office of Governor Tim Walz 130 State Capitol 75 Rev. Dr. Martin Luther King, Jr. Boulevard St. Paul, MN 55155 |
| Mississippi Public Service Commission Office of the Public Counsel 200 Madison | Office of Governor Tate Reeves P.O. Box 139 Jackson, MS 39205 |

Exhibit B – Service List, (Cont'd.)

| | |
|--|---|
| Missouri Public Service Commission Office of the Public Counsel 200 Madison Street, Suite 650 Jefferson, MO 65102 | Office of Governor Mike Parson Capitol Building Room 216, P.O. Box 720 Jefferson City, MO 65102 |
| Montana Public Service Commission 1701 Prospect Avenue Helena, MT 59620 | Office of Governor Steve Bullock State Capitol Helena, MT 59620-0801 |
| Nebraska Public Service Commission 300 The Atrium 1200 N Street Lincoln, NE 68508 | Office of Governor Pete Ricketts P.O. Box 94848 Lincoln, NE 68509-4848 |
| Public Utilities Commission of Nevada 1150 E. William Street Carson, NV 89701 | Office of Governor Steve Sisolak Capitol Building 101 N. Carson St. Carson City, NV 89701 |
| New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301 | Office of Governor Chris Sununu Office of the Governor 107 North Main Street, Room 208 Concord, NH 03301 |
| New Jersey Board of Public Utilities 44 South Clinton Avenue, 9 th Floor Trenton, NJ 08625 | Office of Governor Phil Murphy The State House P.O. Box 001 Trenton, NJ 08625 |
| New Mexico Public Regulation Commission Utilities Division 1120 Paseo De Peralta Sante Fe, NM 87504 | Office of Governor Michelle Lujan Grisham State Capitol Fourth Floor Santa Fe, NM 87501 |
| New York Public Service Commission Three Empire State Plaza Agency Building 3 Albany, NY 12223 | Office of Governor Andrew Cuomo State Capitol Albany, NY 12224 |
| North Carolina Utilities Commission 4325 Mail Service Center Raleigh, NC 27699 | Office of Governor Roy Cooper Office of the Governor 20301 Mail Service Center Raleigh, NC 27699-0301 |
| North Dakota Public Service Commission 600 E. Boulevard, Dept. 408 Bismarck, ND 58505 | Office of Governor Doug Burgum Dept. 101 600 E. Boulevard Ave. Bismarck, ND 58505-0001 |
| Public Utilities Commission of Ohio 180 East Broad Street, 13 th Floor Columbus, OH 43215 | Office of Governor Mike DeWine 30th Floor 77 South High Street Columbus, OH 43215 |
| Director of PUD Oklahoma Corporation Commission Public Utilities Division, Room 103 2101 N. Lincoln Avenue Oklahoma City, OK 73105 | Office of Governor Kevin Stitt Capitol Building 2300 Lincoln Blvd., Rm. 212 Oklahoma City, OK 73105 |

Exhibit B – Service List, (Cont'd.)

| | |
|---|---|
| Oregon Public Utilities Commission Telecom Division 201 High Street, SE Salem, OR 97301 | Office of Governor Kate Brown State Capitol 900 Court St. NE, Suite 254 Salem, OR 97301 |
| Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 nd Floor Harrisburg, PA 17120 | Office of Governor Tom Wolf Room 225 Main Capitol Building Harrisburg, PA 17120 |
| Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888 | Office of Governor Gina Raimondo State House Providence, RI 02903 |
| South Carolina Public Service Commission 101 Executive Center Suite 100 Columbia, SC 29210 | Office of Governor Henry McMaster 1205 Pendleton Street Columbia, SC 29201 |
| South Dakota Public Utilities Commission Capitol Building 1 st Floor 500 East Capitol Avenue Pierre, SD 57501 | Office of Governor Kristi Noem 500 East Capitol Avenue Pierre, SD 57501 |
| Tennessee Public Utility Commission Attn: Utilities Division 502 Deaderick Street, 4 th Floor Nashville, TN 37243 | Office of Governor Bill Lee Tennessee State Capitol Nashville, TN 37243-0001 |
| Public Utility Commission of Texas Central Records Division 1701 N. Congress Avenue Austin, TX 78711 | Office of Governor Greg Abbott P.O. Box 12428 Austin, TX 78711 |
| Utah Public Service Commission Heber M. Wells Building 160 East 300 South Street Salt Lake City, UT 84114 | Office of Governor Gary R. Herbert Utah State Capitol Suite 200 Salt Lake City, UT 84114 |
| Vermont Public Utility Commission 112 State Street, 4 th Floor Montpelier, VT 05620 | Office of Governor Phil Scott 109 State Street Pavilion Office Building Montpelier, VT 05609 |
| Virginia State Corporation Commission Tyler Building, 1 st Floor 1300 E. Main Street Richmond, VA 23219 | Office of Governor Ralph Northam State Capitol Third Floor Richmond, VA 23219 |

Exhibit B – Service List, (Cont'd.)

| | |
|---|---|
| Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive, SW Olympia, WA 98504 | Office of Governor Jay Inslee Office of the Governor P.O. Box 40002 Olympia, WA 98504-0002 |
| West Virginia Public Service Commission 201 Brooks Street Charleston, WV 25323 | Office of Governor Jim Justice 1900 Kanawha Street Charleston, WV 25305 |
| Wisconsin Public Service Commission 610 N. Whitney Way Madison, WI 53705 | Office of Governor Tony Evers 115 East State Capitol Madison, WI 53707 |
| Wyoming Public Service Commission Hansen Building, suite 300 2515 warren Avenue Cheyenne, WY 82002 | Office of Governor Mark Gordon State Capitol Building Room 124 Cheyenne, WY 82002 |

CERTIFICATE OF SERVICE

STATE OF FLORIDA)

COUNTY OF ORANGE)

On this date, February 17, 2020, Notice of the foregoing Section 63.71 Application was sent by U.S. Mail postage prepaid to the service list contained in Exhibit B.

/s/Keith Rice

For Shipping Department
Inteserra Consulting Group, Inc.

Conclusion

Legacy Long Distance International, Inc. respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Legacy understands that this application will be automatically granted on the 31st day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 17th day of February, 2020.

By: 

Brian Hill
CEO
Legacy Long Distance International, Inc.

Sharon R. Warren, Consultant to
Legacy Long Distance International, Inc.
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3005
Facsimile: 407-740-0613
E-Mail: swarren@inteserra.com