

# Morgan Lewis

**Ronald W. Del Sesto**

**Brett P. Ferenchak**

**Niki Wasserman**

Ronald.delsesto@morganlewis.com

brett.ferenchak@morganlewis.com

niki.wasserman@morganlewis.com

July 22, 2024

## ***VIA E-FILING***

Secretary to the Commission  
Kansas Corporation Commission  
1500 Southwest Arrowhead Road  
Topeka, KS 6604-4027

### **Re: Notification of ANPI Business, LLC Regarding the Planned Discontinuance of Switchless Long Distance and Toll-Free Services**

Dear Sir or Madam:

On behalf of ANPI Business, LLC (the "Company"), this letter notifies the Kansas Corporation Commission ("Commission") of the Company's intention to discontinue the switchless long distance and toll-free services that it provides to certain business end user customers (the "Services") in Kansas. The Company understands that approval is not required for the planned discontinuance; thus, this letter is submitted for informational purposes.<sup>1</sup>

### **Description of the Company**

The Company, a Delaware limited liability company, has its principal office at One North Wacker Drive, Suite 2500, Chicago, IL 60606. The Company provides wholesale and retail interexchange service throughout the U.S., and is authorized to provide competitive local exchange service in a limited number of states. In Kansas, the Company is authorized to provide (1) interexchange services pursuant to Docket No. 01-ZTIC-218-COC and (2) local

---

<sup>1</sup> KAR 92-13-2.

### **Morgan, Lewis & Bockius LLP**

1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
United States

**T** +1.202.739.3000  
**F** +1.202.739.3001

exchange and exchange access services pursuant to Docket No. 13-ZTIC-458-COC.<sup>2</sup> The Company is also authorized by the FCC to provide interstate and international telecommunications services.

### **Description of the Service Affected**

The Company seeks approval to discontinue the provision of switchless long distance and toll-free services provided to business customers that were originally provided by the Company's predecessor-in-interest, Zone Telecom, Inc. ("Zone Telecom"). This discontinuance will affect approximately one customer in Kansas.

The Company is discontinuing its Services because the servers used to support the Services are at their end of life and no longer supported by their manufacturer and therefore must be decommissioned by August 31, 2024. Further, the Services are provided using a custom-built system that cannot be readily or cost-efficiently moved to other servers or platforms. Further, the Company has not marketed or otherwise offered the Services to new customer for at least several years. The Company, therefore, has determined to discontinue the Services.

The discontinuance of the Services is not only necessary and appropriate due to the decommissioning of the outdated servers supporting the Services but will also not adversely affect the public convenience and necessity. The public will not be harmed by the discontinuance because customers have been given prior notice of the discontinuance along with guidance on timing of seeking out a new service provider. The Services that are being discontinued are also readily available from other carriers, including the Company's affiliates, and the Company will work with customers to transition them to other carriers' services if requested to do so.

The Company will continue to provide interexchange and local exchange services to other customers. Therefore, the Company does not seek to surrender its Certificates at this time.

### **Date of Planned Service Discontinuance**

The Company plans to discontinue the provision of the Services on August 31, 2024, because the servers used to support the Services are at their end of life and no longer supported by their manufacturer.

### **Customer Notice**

The Company sent notice of the discontinuance to the affected customer on June 6, 2024. A copy of the notice is attached as Exhibit A.

---

<sup>2</sup> The Certificates of Convenience was originally granted in the name of Zone Telecom, LLC, which changed its name to ANPI Business, LLC in 2013.

Secretary to the Commission  
July 22, 2024  
Page 3

**Designated Contacts**

Questions or any correspondence, orders or other materials pertaining to this filing should be directed to the following:

Ronald W. Del Sesto  
Brett P. Ferenchak  
Niki Wasserman  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Ave, N.W.  
Washington, DC 20004-2541  
202-739-3000 (tel)  
202-739-3001 (fax)  
ronald.delsesto@morganlewis.com  
brett.ferenchak@morganlewis.com  
niki.wasserman@morganlewis.com

With a copy to:

Attn: Legal Department  
ANPI Business, LLC  
One North Wacker Drive, Suite  
2500  
Chicago, IL 60606  
[ig-legalnotices@sinch.com](mailto:ig-legalnotices@sinch.com)

\* \* \* \* \*

Please acknowledge receipt and acceptance of this filing. Should you have any questions regarding this filing, please do not hesitate to contact us.

Respectfully submitted,

*/s/ Brett P. Ferenchak*

Ronald W. Del Sesto  
Brett P. Ferenchak  
Niki Wasserman

*Counsel to ANPI Business, LLC*

**Exhibit A**

**Customer Notice**



**NOTICE OF DISCONTINUANCE OF  
SWITCHLESS LONG DISTANCE AND TOLL FREE SERVICES  
DO NOT DISREGARD THIS NOTICE**

June 6, 2024

RE: Account #[Customer Acct # here]

Dear Customer,

Regrettably, ANPI Business, LLC f/k/a Zone Telecom Inc. (“Carrier”) plans to discontinue its intrastate, interstate and international switchless long distance and toll free service (the “Services”)<sup>1</sup> on August 31, 2024, subject to regulatory approval (the “Discontinuance Date”) because the platform that Carrier uses to provide those services is at its end of life and must be retired. Since as of the Discontinuance Date Carrier will no longer provide the Services to you, please immediately take action to contact a new service provider for your long distance or toll-free service before August 31, 2024. We urge you not to delay in arranging for a new long distance or toll-free service provider, as some providers may require several days or weeks to initiate new services. If you are not certain of your options for obtaining replacement service, you should check the list of providers maintained by the Public Utilities Commission in your state.

Please be aware that you are responsible for paying for all Services provided to you by Carrier during the transition. You may be subject to suspension or termination of your Services in accordance with applicable contracts, tariffs, and rules if you fail to pay your bills. **So that we stop sending you invoices, please let us know as soon as you have switched to a new provider of these services by sending an email to [clientservices@voice.sinch.com](mailto:clientservices@voice.sinch.com). You also may terminate your service, without penalty, by contacting us at [clientservices@voice.sinch.com](mailto:clientservices@voice.sinch.com).**

The Federal Communications Commission (“FCC”) permits customers to object to discontinuance of their service by a telecommunications provider. As provided in the FCC’s rule 47 CFR 63.71:

*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 ANPI Business, 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.*

If you have concerns, you may also contact Public Utilities Commission in your state.

Carrier is pleased to have had the opportunity to serve you for many years and remains committed to making your transition to a new provider as smooth as possible. If you have any questions regarding the discontinuance of your long distance or toll free services, please contact Customer Service at [clientservices@voice.sinch.com](mailto:clientservices@voice.sinch.com) or 866-629-8200.

Sincerely,

ANPI Business, LLC  
One North Wacker Drive, Suite 2500  
Chicago, IL 60606

---

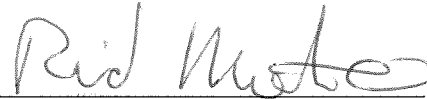
<sup>1</sup> This discontinuance affects customers in the following 23 states: Arizona, California, Colorado, Florida, Georgia, Illinois, Kansas, Maryland, Maine, Michigan, Minnesota, Missouri, North Carolina, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Virginia and Wisconsin.

**VERIFICATION**

I, Richard Monto, state that I am General Counsel of ANPI Business, LLC (“ANPI-Biz”), that I am authorized to make this Verification on behalf of ANPI-Biz, that the foregoing filing was prepared under my direction and supervision, and that the contents are true and correct to the best of my knowledge, information, and belief.

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

Executed July 16, 2024.

A handwritten signature in cursive script that reads "Richard Monto". The signature is written in black ink and is positioned above a horizontal line.

Richard Monto  
General Counsel  
ANPI Business, LLC