

# Morgan Lewis

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March 17, 2017

## VIA IBFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, DC 20554

**Attn: International Bureau**

Re: ANPI Business, LLC (ITC-214-20000717-00403)  
Notification of Discontinuance of Certain International Telecommunication Services

Dear Ms. Dortch:

ANPI Business, LLC (the "Company"), by undersigned counsel and pursuant to Section 63.19 of the Commission's Rules, 47 C.F.R. Section 63.19, notifies the Commission of that the Company plans to discontinue the provision of international telecommunications services to residential (and certain small business) customers throughout the United States.<sup>1</sup> The Company will continue to provide other international telecommunications services to its other customers and therefore does not seek to surrender its international Section 214 authorization (IB File No. ITC-214-20000717-00403).<sup>2</sup> The proposed discontinuance will not result in material harm to the affected customers because they easily can obtain alternative services from other long distance carriers or other providers such as interconnected voice over Internet protocol providers.

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<sup>1</sup> The Company provides intrastate, interstate and international long distances services to the affected customers.

<sup>2</sup> The international Section 214 authorization to provide global or limited global facilities-based service and global or limited global resale service was originally granted to Zone USA, Inc. d/b/a Zone Telecom, Inc., which assigned it to Zone Telecom, LLC. See IB File No. ITC-ASG-20101014-00411. Zone Telecom, LLC subsequently changed its name to ANPI Business, LLC

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1. Name and Address of Carrier:

ANPI Business, LLC  
2300 Berkshire Lane North, Suite 4  
Minneapolis, MN 55441

Correspondence concerning this filing should be sent to:

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

The Company plans to discontinue providing residential long distance services as of June 1, 2017, or as soon thereafter as Commission approval can be obtained. The Company's largest underlying provider, Sprint Communications Company L.P. ("Sprint"), has notified the Company that the services that the Company uses to provide long distance services to certain of the Company's customers will not be available beyond June 2017. Therefore, it is critical that this notice is effective to allow the Company to discontinue residential long distance services as of June 1, 2017

3. Points of Geographic Areas of Service Affected:

The proposed discontinuance will affect residential (and certain small business) customers throughout the United States.

4. Brief Description of Types of Service Affected:

The Company intends to discontinue all residential international services, including but not limited to 1+, MTS and Toll Free services. Since some small businesses may receive the affected residential long distance product, the discontinuance may also affect certain small businesses customers. The Company will continue to provide international services to other non-residential customers. Therefore, the Company does not seek to surrender its international Section 214 authorization at this time.

The Company is separate filing an Application with respect to its discontinuance of domestic long distance services to residential (and certain small business) customers.

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

The Company provided written customer notice of the planned discontinuance in accordance with the requirements of Section 63.71(a) of the Commission's Rules. The notice was sent to all affected customers via first class mail on March 17, 2017. A copy of the notice is appended hereto as

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Exhibit A. Customer in certain states may be provided additional notice(s) of the discontinuance in compliance with state law.

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

The Company is non-dominant with respect to the services that the Company proposes to discontinue.

\* \* \* \*

The Company believes that the proposed discontinuance is reasonable and necessary. The Company will take all reasonable steps, to the extent it is able, to assure that the discontinuance of service is not unduly disruptive to the present or future public convenience and necessity.

Please acknowledge receipt and acceptance of this Notification. Please feel free to contact us if you have any questions regarding this filing.

Respectfully submitted,

*/s/ Brett P. Ferenchak*

Russell M. Blau  
Brett P. Ferenchak

Counsel for ANPI Business, LLC

cc: Chief, International Bureau

**Exhibit A**

**Sample Customer Notice**

**NOTICE OF LONG DISTANCE SERVICES DISCONTINUANCE  
DO NOT DISREGARD THIS NOTICE**

March 17, 2017

RE: Account #[Customer Acct # here]

Dear Customer:

We regret to inform you that ANPI Business, LLC will be discontinuing all residential long distance services (including such services provided to small businesses). As a result, your ANPI Business, LLC service(s), including intrastate, interstate and international long distance services, will be discontinued on or after June 1, 2017, subject to regulatory approval.

Please take action in selecting a new carrier as soon as possible to avoid any interruption of your long distance service. We urge you not to delay in arranging for a new long distance service provider, as some providers may require several days or weeks to initiate new services. To help avoid any lapses in service, please check carefully that all long distance services you currently receive from ANPI Business, LLC, along with any toll free numbers that are assigned to you, are moved to your new provider. If you are not certain of your options for obtaining replacement pre-subscribed long distance service, you should contact your local telephone service provider and ask which carriers are accepting pre-subscribed customers. You may also contact any of the service companies that provide service in your area. An Internet search for "long distance telephone service provider" in your area should provide you with several alternatives.

Please be aware that you are responsible for paying for all services provided to you by ANPI Business, LLC during the transition. You may be subject to suspension or termination of your long distance service in accordance with applicable contracts, tariffs, and rules if you fail to pay your long distance bills. **So that we stop sending you invoices, please let us know as soon as you have switched to a new long distance provider by sending an email to [care@voyant.com](mailto:care@voyant.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, including any inability to acquire reasonable substitute service."*

ANPI Business, LLC is pleased to have had the opportunity to serve you, and remains committed to making your long distance service transition as smooth as possible. If you have any questions regarding our discontinuance of long distance services, please contact Customer Service at 1-800-262-9043.

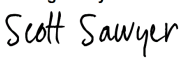
Sincerely yours,  
ANPI Business, LLC Customer Service

**VERIFICATION**

I, Scott Sawyer, state that I am General Counsel and Secretary of ANPI Business, LLC; that I am authorized to make this Verification on behalf of ANPI Business, LLC; that I have read the foregoing filing and know the contents thereof; and that the same are true and correct to the best of my knowledge, information and belief and are made in good faith.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of March, 2017.

**ANPI Business, LLC**

DocuSigned by:  
  
CF9066AD3AB1405...  
By: Scott Sawyer  
Title: General Counsel and Secretary