

October 18, 2022

**Via ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: In the Matter of Section 63.71 Application of Mitel Cloud Services Inc. For Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Discontinue the Sale of Certain Business Network Services and Provision of Certain Time Division Multiplexing Services; WC Docket No. 22-311**

Dear Ms. Dortch:

Mitel Cloud Services Inc. ("Mitel"), through undersigned counsel, and after discussion with Commission staff, hereby amends the above-referenced application.

In the Application, Mitel requested approval to end the sale of certain Business Network Services. Mitel also requested approval to discontinue all of its Time Division Multiplexing ("TDM") services, effective December 31, 2022. At this time, Mitel is not seeking approval to grandfather its Business Network Services. Mitel is only requesting approval to discontinue its Private Line, Dedicated Internet, MPLS, PRI, Dedicated Long Distance, and Dynamic and Integrated T1 TDM-based services, effective December 31, 2022. Because Mitel provides these services on a private carrier basis, the services are not subject to the discontinuance requirements. Nonetheless, Mitel submitted the Application out of an abundance of caution to the extent any of the services could be considered to be or facilitate I-VoIP offers.

Mitel is not a facilities-based provider. Mitel leases facilities from or resells the services of its underlying providers to provide Private Line, Dedicated Internet, MPLS, PRI, Dedicated Long Distance and Dynamic and Integrated T1 TDM-based services. Mitel typically provides these services to its business customers who have licensed a Mitel PBX. Because Mitel relies on its underlying providers for the services, Mitel does not control the availability, pricing or access to the facilities used to provide these services.

Mitel's discontinuance of TDM services is not a "Technology Transition" as defined in 47 C.F.R. § 63.60(i) because customers are not required to replace their service with a different technology or medium for transmission. Mitel offers its TDM services using other providers' last-mile facilities. To the best of Mitel's information and belief, a facilities-based provider will continue to offer a wireline voice solution at all of the locations where Mitel has customers. In addition, the affected customers will be

able to choose alternative services from other providers, including cable providers, facilities-based local exchange carriers, and wireless providers. Affected customers may also be able to choose to obtain TDM-based wireline voice solutions offered by the remaining providers in the affected areas. Affected customers may choose to transition their service to non-TDM based solutions available in the market; however, they are not required to do so.

Mitel provided each affected customer notice of the discontinuance of TDM services via email. Mitel also anticipates working with individual customers as needed to facilitate their transition to alternative service providers prior to December 31, 2022.

Mitel requests the Commission approve the discontinuance of Mitel's Private Line, Dedicated Internet, MPLS, PRI, Dedicated Long Distance, and Dynamic and Integrated T1 TDM-based services effective December 31, 2022.

Should you have any questions regarding this matter, please do not hesitate to contact me at 703-714-1319 or via email at [mpd@commlawgroup.com](mailto:mpd@commlawgroup.com).

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael P. Donahue". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Donahue

*Counsel for Mitel Cloud Services Inc.*

cc: Kimberly Jackson (via email)