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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Section 63.71 Application of)	
)	
Level 3 Telecom)	WC Docket No. 20-_____
)	
For Authority Pursuant to Section 214 of the)	
Communications Act of 1934, As Amended,)	
to Grandfather the Provision of Enterprise)	
SIP Trunking)	

SECTION 63.71 APPLICATION

CenturyLink¹ hereby applies for authority pursuant to Section 63.71 of the Federal Communications Commission's (Commission) rules, 47 C.F.R. § 63.71, and Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, to grandfather its Enterprise SIP Trunking (ESIP) service in all states and jurisdictions where the service is offered. CenturyLink ultimately plans to discontinue these services but is not seeking authority to do so at this time.

CenturyLink submits the following information in support of its application:

1. Name and address of carrier

Level 3 Telecom
100 CenturyLink Drive
Monroe, Louisiana 71203

¹ CenturyLink, Inc. (FRN 0018-6268-53) files this application on behalf of its Level 3 Telecom affiliates listed in Appendix A.

2. Date of planned service discontinuance

As of March 20, 2020, or as soon thereafter as the necessary regulatory approvals can be obtained, CenturyLink will no longer offer ESIP service to new customers nor accept new orders from existing customers (except to the extent such orders are permitted by contract). Existing customers of these services will be grandfathered as follows:

- Existing contracts for these services will not be renewed.
- Customers with a contract may retain affected services on a month-to-month basis once that contract expires.

3. Points of geographic areas of service affected

CenturyLink seeks authority to grandfather the provision of ESIP service in Alabama, Arkansas, Arizona, California, Colorado, Connecticut, the District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, North Carolina, Nebraska, New Jersey, New Mexico, Nevada, New York, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, and Wisconsin.

4. Brief description of the type of services affected

Enterprise SIP Trunking is a Voice over Internet Protocol (VoIP) service that allows the sharing of SIP call paths across two redundant IP-PBX platforms and provides bi-directional Business Continuity and Disaster Recovery functionality.

CenturyLink is grandfathering ESIP service because the service is at the end of its product life cycle, as the equipment associated with this service has been discontinued by the manufacturer and is no longer supported.

The public convenience and necessity will not be adversely affected by the grandfathering of the services described herein. No other products or services are impacted by this application.

5. Brief description of the dates and methods of notice to all affected customers

CenturyLink notified its customers of the plan to grandfather ESIP service in a letter sent via U.S. Mail on January 27, 2020. Those customers were notified that the proposed grandfathering would take effect on March 20, 2020, or as soon after that date as authorized by the relevant regulatory commissions. A copy of the customer notification letter is appended hereto. (*See Attachment A.*)

6. Dominance of carrier with respect to the service to be grandfathered

CenturyLink is a non-dominant carrier with regard to the services to be grandfathered.

7. Service

In accordance with 47 C.F.R. § 63.71(a), CenturyLink has mailed a copy of this application to the Governor and public utility commission of each affected state identified in

Paragraph 3 above, to any federally-recognized Tribal Nations with authority over the Tribal lands in the geographic areas identified in Paragraph 3 above, as well as to the Special Assistant for Telecommunications under the Secretary of Defense².

Respectfully submitted,

CENTURYLINK

By: Craig J. Brown
Craig J. Brown *by mh*
CenturyLink, Inc.
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Washington, DC 20001
Phone 303-992-2503
Craig.J.Brown@CenturyLink.com

Its Attorney

DATE: January 29, 2020

² Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

Appendix A

Level 3 Telecom of Alabama, LLC	0017-3479-72
Level 3 Telecom of Arkansas, LLC	0017-3480-12
Level 3 Telecom of Arizona, LLC	0004-3522-74
Level 3 Telecom of California, LP	0004-3511-10
Level 3 Telecom of Colorado, LP	0004-3510-86
Level 3 Telecom of D.C., LLC	0017-3480-38
Level 3 Telecom of Florida, LP	0004-3514-66
Level 3 Telecom of Georgia, LP	0004-3513-83
Level 3 Telecom of Idaho, LLC	0004-3522-66
Level 3 Telecom of Illinois, LLC	0004-3523-08
Level 3 Telecom of Indiana, LLC	0004-3512-76
Level 3 Telecom of Kansas City, LLC	0017-3480-61
Level 3 Telecom of Kentucky, LLC	0017-3480-87
Level 3 Telecom of Louisiana, LLC	0017-3481-11
Level 3 Telecom of Maryland, LLC	0017-3482-02
Level 3 Telecom of Minnesota, LLC	0004-3522-90
Level 3 Telecom of Mississippi, LLC	0017-3482-10
Level 3 Telecom of Nevada, LLC	0004-3522-58
Level 3 Telecom of New Jersey, LLC	0004-3514-09
Level 3 Telecom of New Mexico, LLC	0004-3514-17
Level 3 Telecom of New York, LP	0004-3514-25
Level 3 Telecom of North Carolina, LLC	0004-3514-74
Level 3 Telecom of Ohio, LLC	0004-3514-82
Level 3 Telecom of Oregon, LLC	0004-3515-73
Level 3 Telecom of South Carolina, LLC	0004-3522-82
Level 3 Telecom of Tennessee, LLC	0004-3514-58
Level 3 Telecom of Texas, LLC	0004-3511-28
Level 3 Telecom of Utah, LLC	0004-3515-57
Level 3 Telecom of Virginia, LLC	0017-3485-90
Level 3 Telecom of Washington, LLC	0004-3515-32
Level 3 Telecom of Wisconsin, LP	0004-3513-18
Level 3 Telecom Data Services, LLC	0017-3481-45



DATE

«Customer_name»

Billing Account Number: «BAN»

«Address_1»

«Address_2»

«Address_3»

«City», «State» «Zip»

Important Notice Regarding the Planned Grandfathering and Discontinuance of Enterprise SIP Trunking Provided by Level 3 Telecom, a CenturyLink Company

Dear «Customer_contact_name»:

At CenturyLink, our goal is to provide you with great quality and value while still remaining competitive. Changing market conditions require that we continually evaluate our prices, product offerings and infrastructure.

Occasionally our evaluation directs us to make changes to some products; therefore we are writing to inform you that CenturyLink is grandfathering, and ultimately discontinuing, the Enterprise Session Initiation Protocol (SIP) Trunking product offered by its Level 3 Telecom affiliates in Alabama, Arkansas, Arizona, California, Colorado, Connecticut, the District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, North Carolina, Nebraska, New Jersey, New Mexico, Nevada, New York, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, and Wisconsin. This action is necessary because the equipment associated with these services has been discontinued by the manufacturer and is no longer supported.

Enterprise SIP Trunking is a Voice over Internet Protocol (VoIP) service that allows the sharing of SIP call paths across two redundant IP-PBX platforms and provides bi-directional Business Continuity and Disaster Recovery functionality.

As of March 20, 2020, or as soon after that date as authorized by the Federal Communications Commission and relevant state regulatory commissions, Level 3 Telecom's Enterprise SIP Trunking product will no longer be available to new customers or for new orders from existing customers.

Service to existing customers of these services will be grandfathered and discontinued as follows:

- Existing contracts for these services will not be renewed.
- Customers with a contract may retain affected services on a month-to-month basis once that contract expires.

There are various options to replace your current service with an alternate CenturyLink service. For example, CenturyLink's Voice Complete service would be ideal if you have three or more locations that will share unlimited Concurrent Call Pathways (CCPs) and it supports a hybrid environment of TDM or IP handoffs. If you are looking for additional feature packages, IQ SIP would be a great fit. IQ SIP offers up to 120,000 shared CCPs with an enhanced portal experience.

Functional Component	IQ SIP	Voice Complete
Customer Size Sweet Spot	10-500 employees	500+ employees
Max Call Paths	200,000	Unlimited
Shared Call Paths	✓	✓
Local and LD/National Calling	✓	✓
Switched TF/Freephone	✓	✓
International Origination	Not Available	✓
International Termination	✓	✓
Countries Supported	United States Only	US, UK, France, Germany, Belgium, Netherlands
Managed SBC Provided	✓ (available with data bundle)	Not Available
Geographically Independent TNs	✓	✓
Failover Protection Included	✓	✓
PRI Handoff	✓	✓ (native)
Self-Service Portal	✓	✓
TN and CCP Ordering in the Portal	✓ (near real time)	✓
Voice Encryption/TLS	✓	Not Available
Nomadic 911 self-service in Portal	✓	✓

You are encouraged to migrate now to another CenturyLink service. Please do not delay migrating your service, as you will risk business disruption due to network service unavailability.

We understand that this is an inconvenience, but we are confident that our team can seamlessly manage the entire process to provide your business with a better communications solution.

If you subscribe to other services from CenturyLink, those services will NOT be impacted by the anticipated discontinuance of the affected services. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We would like to work with you as soon as possible to ensure we update your service and continue our valued relationship, so please contact your account manager or our toll-free

customer service number 800-871-9244 to speak with a sales contact for options that are available to you.

We will communicate with you 60 days prior to any service being disconnected. Thank you for your cooperation and prompt attention to this notice.

Sincerely,

CenturyLink

xxx-xxx-xxxx (Toll Free Number)

www.CenturyLink.com

The following statement is required by the FCC:

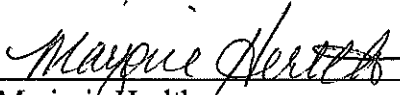
The FCC will normally authorize this proposed reduction or impairment of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 10 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 Level 3 Telecom, a CenturyLink Company. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing **SECTION 63.71**

APPLICATION to be:

- 1) Filed with the Secretary of the FCC via ECFS (Inbox-Section 214 Domestic Discontinuance Application);
- 2) Served via first-class U.S. Mail, postage prepaid, on the Governors of the States listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commissions listed on the attached service list;
- 4) Served via first-class U.S. Mail, postage prepaid, or via email on the Regulatory Authority for the Tribal Nations listed on the attached service list; and
- (5) Served via first-class U.S. Mail, postage prepaid, on the Special Assistant for Telecommunications under the Secretary of Defense¹.



Marjorie Herlth

January 29, 2020

¹ Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

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Montgomery, AL 36130

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Montgomery, AL 36130-4260

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Phoenix, AZ 85007

Arizona Corporation Commission
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Phoenix, AZ 85007-2996

Asa Hutchison
Office of the Governor
500 Woodlane Street
Little Rock, AR 72201

Arkansas Public Service Commission
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Little Rock, AR 72203-0400

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California Public Utilities Commission
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San Francisco, CA 94102-3298

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Colorado Public Utilities Commission
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Office of the Governor
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210 Capitol Avenue
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Connecticut Public Utilities Regulatory
Authority
10 Franklin Square
New Britain, CT 06051

Muriel Bowser
Executive Office of the Mayor of the
District of Columbia
1350 Pennsylvania Avenue, N.W.
Suite 316
Washington, DC 20004

District of Columbia Public Service
Commission
1325 G Street, N.W.
Suite 800
Washington, DC 20005

Ron DeSantis
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400 S. Monroe St.
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New Mexico Public Regulation Commission
Attn: Mr. Mike Ripperger
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Santa Fe, NM 87504

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Albany, NY 12223-1350

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Salt Lake City, UT 84114-2220

Public Service Commission of Utah
Heber M. Wells Building
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Salt Lake City, UT 84111

Minnesota Chippewa Tribe – Grand Portage
Band
Beth Drost
PO Box 428
Grand Portage MN 55606

Prairie Island Indian Community in the State
of Minnesota
Daniel Derudder
Blank Johnson
5636 Sturgeon Lake Rd.
Welch MN 55089

Puyallup Tribe of the Puyallup Reservation
Angel Robertiello
3009 E. Portland Ave.
Tacoma WA 98404-4926

Shakopee Mdewakanton Sioux Community
of Minnesota
Dawn Blanchard
2330 Sioux Trail NW
Prior Lake MN 55372

Department of Defense
Chief Information Officer
Pentagon
Washington, DC 20301

Quechan Tribe of the Fort Yuma Indian Reservation
Tohono O'odham Nation of Arizona
Tonto Apache Tribe of Arizona
Yavapai-Apache Nation of the Camp Verde Indian Reservation
Yavapai-Prescott Indian Tribe
Nez Perce Tribe
Seminole Tribe of Florida (Big Cypress and Brighton Reservations)
Shoshone-Bannock Tribes of the Fort Hall Reservation

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nsmall@sbtribes.com;

Southern Ute Indian Tribe of the Southern Ute Reservation, CO
Ute Mountain Ute Tribe
Coushatta Tribe of Louisiana
Grand Traverse Band of Ottawa and Chippewa Indians, Michigan
Iowa Tribe of Kansas and Nebraska
Jena Band of Choctaw Indians
Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas

Prairie Band Potawatomi Nation
Sac and Fox Nation of Missouri in Kansas and Nebraska
Sault Ste. Marie Tribe of Chippewa Indians, Michigan
Tunica-Biloxi Indian Tribe
Lower Sioux Indian Community in the State of Minnesota
Minnesota Chippewa Tribe - Bois Forte Band (Nett Lake)
Minnesota Chippewa Tribe - Fond du Lac Band
Minnesota Chippewa Tribe - Grand Portage Band
Minnesota Chippewa Tribe - Leech Lake Band

Minnesota Chippewa Tribe - Mille Lacs Band
Minnesota Chippewa Tribe - White Earth Band
Minnesota Chippewa Tribe, Minnesota (Bois Forte Band (Nett Lake); Fond du Lac Band; Grand Portage Band; Leech Lake Band; Mille Lacs Band; White Earth Band)
Prairie Island Indian Community in the State of Minnesota

Red Lake Band of Chippewa Indians
Shakopee Mdewakanton Sioux Community of Minnesota
Upper Sioux Community, Minnesota
Omaha Tribe of Nebraska
Winnebago Tribe of Nebraska
Kewa Pueblo, New Mexico (Pueblo of Santo Domingo)
Pueblo of Acoma, New Mexico
Pueblo of Cochiti, New Mexico
Pueblo of Isleta, New Mexico
Pueblo of Nambe, New Mexico
Pueblo of Picuris, New Mexico
Pueblo of Pojoaque, New Mexico
Pueblo of San Felipe, New Mexico
Pueblo of San Ildefonso, New Mexico
Pueblo of Sandia, New Mexico
Pueblo of Santa Ana, New Mexico
Pueblo of Taos, New Mexico
Pueblo of Tesuque, New Mexico
Pueblo of Zia, New Mexico
Coquille Indian Tribe
Cow Creek Band of Umpqua Tribe of Indians
Gila River Indian Community of the Gila River Indian Reservation

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Lower Brule Sioux Tribe of the Lower Brule Reservation, SD
Burns Paiute Tribe
Confederated Tribes of Warm Springs
Confederated Tribes of the Grand Ronde Community of Oregon
Confederated Tribes of Siletz Indians of Oregon

Confederated Tribes of the Umatilla Indian Reservation

Klamath Tribes
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony
Shoshone-Paiute Tribes of the Duck Valley Reservation
Confederated Tribes and Bands of the Yakama Nation
Confederated Tribes of the Chehalis Reservation
Confederated Tribes of the Colville Reservation
Cowlitz Indian Tribe
Hoh Indian Tribe
Jamestown S'Klallam Tribe
Lower Elwha Tribal Community
Lummi Tribe of the Lummi Reservation
Makah Indian Tribe of the Makah Indian Reservation
Muckleshoot Indian Tribe
Nisqually Indian Tribe
Port Gamble S'klallam Tribe
Puyallup Tribe of the Puyallup Reservation
Quileute Tribe of the Quileute Reservation
Quinault Indian Nation
Skokomish Indian Tribe
Snoqualmie Indian Tribe
Spokane Tribe of the Spokane Reservation
Squaxin Island Tribe of the Squaxin Island Reservation
Squamish Indian Tribe of the Port Madison Reservation
Confederated Tribes of the Colville Reservation
Bad River Band of the Lake Superior Tribe of Chippewa Indians of
the Bad River Reservation, Wisconsin
Forest County Potawatomi Community, Wisconsin
Ho-Chunk Nation of Wisconsin
Lac Courte Oreilles Band of Lake Superior Chippewa Indians of
Wisconsin
Lac du Flambeau Band of Lake Superior Chippewa Indians of the
Lac du Flambeau Reservation of Wisconsin
Oneida Nation
Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
St. Croix Chippewa Indians of Wisconsin
Paiute Indian Tribe of Utah (Cedar Band of Paiutes, Kanosh Band
of Paiutes, Koosharem Band of Paiutes, Indian Peaks Band of
Paiutes, and Shivwits Band of Paiutes)

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