



CenturyLink™

COPY

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Assistant General Counsel

VIA ECFS

May 18, 2020

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

RECEIVED
MAY 26 2020
P.U.C.

Re: Amendment - Section 63.71 Application of Level 3 Telecom For Authority
Pursuant to Section 214 of the Communications Act of 1934, As Amended, to
Grandfather the Provision of Enterprise SIP Trunking – WC Docket No. 20-33

Dear Ms. Dortch:

By this letter, CenturyLink amends its application seeking to grandfather the provision of Enterprise SIP Trunking, filed on January 29, 2020 in the above-referenced docket (Application).

CenturyLink amends the Application by requesting an effective date of June 30, 2020 and clarifying that the application seeks to grandfather the Affected Service, and not to discontinue the service at this time. A copy of the Notice of clarification to Customers, mailed on April 22, 2020 is attached hereto.

Please contact me should you have any questions.

Sincerely,

/s/ Craig J. Brown

Copy (via email) to: Kimberly Jackson (Kimberly.Jackson@fcc.gov)
Copy via First-Class U.S. Mail, Postage Prepaid, Certificate of Service



100 CenturyLink Drive
Monroe, Louisiana 71203

DATE

«Customer_name» Billing Account Number: « BAN »
«Address_1»
«Address_2»
«Address_3»
«City», «State» «Zip»

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

Dear «Customer_contact_name»:

On January 27, 2020, Level 3 Telecom notified you by letter of its intent to grandfather its Enterprise SIP Trunking service. This letter corrects an error in the January 27th notice and replaces and supersedes that notice.

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 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 this service 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 June 30, 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 this service will be grandfathered as follows:

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

Please be aware that there are various options to replace your current service with an alternate CenturyLink service. For example, CenturyLink’s Voice Complete service would be an ideal replacement 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, to avoid risk of business disruption due to network service unavailability if the equipment should go down.

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 grandfathering of the Enterprise SIP Trunking product. 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.

Thank you for your cooperation and prompt attention to this notice.

Sincerely,

CenturyLink
800-871-9244 (Toll Free Number)
www.CenturyLink.com

N-20-xxx

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 15 days after the Commission releases public notice of the proposed reduction or impairment of service. 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 reduction or impairment of service 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 (letter amendment) to be:

- 1) Filed with the Secretary of the FCC via ECFS;
- 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

May 18, 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.

Kay Ivey
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600 Dexter Avenue
Montgomery, AL 36130

Alabama Public Service Commission
P. O. Box 304260
Montgomery, AL 36130-4260

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Arizona Corporation Commission
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Phoenix, AZ 85007-2996

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Arkansas Public Service Commission
P. O. Box 400
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Gavin Newsom
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Denver, CO 80202

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Hartford, CT 06106

Connecticut Public Utilities Regulatory
Authority
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New Britain, CT 06051

Muriel Bowser
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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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The Capitol
400 S. Monroe St.
Tallahassee, FL 32399

Florida Public Service Commission
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Brian Kemp
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Atlanta, GA 30334

Georgia Public Service Commission
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Chicago, IL 60601

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Indiana Utility Regulatory Commission
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Indianapolis, IN 46204

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Missouri Public Service Commission
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Jefferson City, MO 65102-0360

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New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

Michelle Lujan Grisham
Office of the Governor
490 Old Santa Fe Trail, Room 400
Santa Fe, NM 87501

New Mexico Public Regulation Commission
Attn: Mr. Mike Ripperger
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, NM 87504

Andrew M. Cuomo
Office of the Governor
NYS State Capitol Building
Albany, NY 12224

New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Roy Cooper
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

Mike DeWine
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Public Service Commission of Utah
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Minnesota Chippewa Tribe – Grand Portage
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Beth Drost
PO Box 428
Grand Portage MN 55606

Prairie Island Indian Community in the State
of Minnesota
Daniel Derudder
Blank Johnson
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Puyallup Tribe of the Puyallup Reservation
Angel Robertiello
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Shakopee Mdewakanton Sioux Community
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Dawn Blanchard
2330 Sioux Trail NW
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Department of Defense
Chief Information Officer
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Washington, DC 20301

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Minnesota Chippewa Tribe - Grand Portage Band	beth@grandportage.com ;
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Minnesota Chippewa Tribe - Mille Lacs Band	melanie.benjamin@millelacsband.com ;
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Spokane Tribe of the Spokane Reservation	Jaime.Martin@snoqualmietribe.us ;
Squaxin Island Tribe of the Squaxin Island Reservation	carole@spokanetribe.com ;
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Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	dakota.walton-smith@ho-chunk.com ;
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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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