

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
)
Section 63.71 Application of)
)
)
CenturyLink Communications, LLC f/k/a)
Embarq Communications, LLC and)
CenturyLink Communications, LLC f/k/a)
Qwest Communications Company, LLC)
d/b/a CenturyLink QCC)
)
For Authority Pursuant to Section 214 of)
the Communications Act of 1934, As Amended,)
to Discontinue the Provision of Service)

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

SECTION 63.71 APPLICATION

CenturyLink Communications, LLC (FRN: 0018-4219-41), f/k/a Embarq Communications, LLC and also f/k/a Qwest Communications Company, LLC d/b/a CenturyLink QCC (referred to herein as “CenturyLink”) hereby applies for authority to discontinue service to its remaining customers of various Voice over Internet Protocol (“VoIP”) services that have operated on a VoIP platform, known as Sylanro, that is no longer technically supported. CenturyLink requests authority from the Federal Communications Commission (“Commission”) to discontinue these services as of March 14, 2019.

This application is related to a prior Section 63.71 application filed by CenturyLink on August 21, 2018 and granted by operation of law on October 8, 2018, seeking to discontinue the same services covered by this application.¹ After filing the August 21, 2018 Application,

¹ See *In the Matter of Section 63.71 Application of CenturyLink Communications, LLC f/k/a Embarq Communications, LLC and CenturyLink Communications, LLC f/k/a Qwest*

CenturyLink discovered that it had inadvertently failed to notify three customers of its Sylanro-based VoIP services. CenturyLink now seeks authority to discontinue service to those remaining customers.

CenturyLink submits the following information in support of its application:

1. Name and address of carrier

CenturyLink
100 CenturyLink Drive
Monroe, LA 71203

2. Date of planned service discontinuance

As of March 14, 2019, or as soon thereafter as the necessary regulatory approvals can be obtained, CenturyLink plans to cease offering the services supported by the Sylanro VoIP platform in the manner outlined below.

Pursuant to the Commission's grant of the August 21, 2018 Application, CenturyLink has already discontinued offering the services supported by the Sylanro VoIP platform to any new customers. The three customers covered by this application can maintain their existing Sylanro VoIP platform services for the duration of their current service contract term, but will not be able to make moves, adds or changes to those services. If one or more of these customers decides to move to the new platform, they will sign a new contract and CenturyLink will waive any early termination penalties on their old contract.

Communications Company, LLC d/b/a CenturyLink QCC For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue the Provision of Service, Section 63.71 Application, WC Docket No. 18-266 (filed Aug. 21, 2018) (August 21, 2018 Application); Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications Services and/or Interconnected VoIP Services, WC Docket No(s). 18-262, 18-264, 18-265, 18-265, 18-266, DA 18-922 (rel. Sept. 7, 2018).

3. Points of geographic areas of service affected

CenturyLink seeks authority to discontinue offering services supported by the Sylanro VoIP platform in all 50 states and Washington D.C.

4. Brief description of the type of services affected

The Sylanro VoIP platform has reached its end of life and CenturyLink is seeking to discontinue the VoIP services provided by the platform, which are:

- Qwest OneFlex Hosted VoIP: An IP application that provides real-time, two-way voice capability in IP over a broadband connection.
- Qwest OneFlex Integrated Access – Analog and Digital: An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- Qwest Managed VoIP: An IP application that provides real-time, two-way voice capability in IP over a broadband connection.
- Qwest Hosted VoIP: An IP application that provides real-time, two-way voice capability in IP over a broadband connection.
- Qwest IQ Managed VoIP Bundle: An IP application that provides real-time, two-way voice capability in IP over a broadband connection.
- IQ Integrated Access Packages: An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- IQ Integrated Access Analog: An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- IQ Integrated Access Digital: An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- Core Connect Enterprise Integrated Access (IA) (*services sold before December 31, 2015): An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- Fiber+ Integrated Access (IA) (*services sold before December 31, 2015): An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- Fiber+ Enterprise Integrated Access (IA) (*services sold before December 31, 2015): An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- CenturyLink Managed VoIP: An IP application that provides real-time, two-way voice capability in IP over a broadband connection.
- CenturyLink Integrated Access -Analog: An IP-based solution that integrates local and long-distance voice with Internet access on a single connection.
- CenturyLink Hosted VoIP (BroadSoft): (sold before August 30, 2014 in Florida, Missouri, North Carolina, Nevada, Ohio, Tennessee and Texas) An IP application that provides real-time, two-way voice capability in IP over a broadband connection.

* Note: Services sold after December 31, 2015 were provisioned on a newer VoIP platform and are not included in this application.

Affected customers will be able to maintain their current product configurations for the duration of their current service terms. Customers will also be able to transition to other VoIP solutions offered by CenturyLink on a new VoIP platform with new technology, capabilities and features. Those services include:

- Hosted VoIP
- IQ SIP Trunk (native SIP or PRI handoff)
- Core Connect Enterprise – Integrated Access
- Fiber + Integrated Access (IA)*
- Fiber+ Enterprise Integrated Access (IA)*

* Note: Services sold after December 31, 2015 have been provisioned on a newer VoIP platform and are still available.

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

CenturyLink notified the customers covered by this application by U.S. mail on December 14, 2018 via letters identical to the template shown in Attachment A.

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

CenturyLink is a non-dominant carrier with regard to services supported by the Sylanro VoIP platform.

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 of the affected states and jurisdictions 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 Defense.

Respectfully submitted,

CENTURYLINK

By:



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Washington, DC 20001
Phone 303-992-2503
Craig.J.Brown@CenturyLink.com

Its Attorney

DATE: December 21, 2018

ATTACHMENT A

12/14/18



100 CenturyLink Drive
Monroe, LA 71203

NAME
ADDRESS
ADDRESS

Notice - Discontinuation of Sales and Support of Certain VoIP Services

Dear _____ ,

At CenturyLink, our goal is to provide you with valuable communications services while maintaining a leadership position in the industry. We respond to changing market conditions by continually evaluating our product offerings, pricing and technology to bring new features and capabilities to our customers.

We have recently conducted a product and technology review and determined that your Hosted and/or SIP Trunking services operates on a VoIP platform with aging support capabilities. Based on this review, we are discontinuing this service, as well as the other VoIP services provided by the platform. This notice is to inform you of CenturyLink's plan to stop the sale of these services including your ability to make moves, adds or changes. Existing services will not be eligible for renewal at the end of your current service term.

Effective March 14, 2019, or as soon after that date as authorized by the relevant regulatory commissions, your current CenturyLink VoIP service will no longer be available for new orders, including the elimination of moves, adds, and change orders on your existing services.

You can maintain your current product configurations for the duration of your current service term, but to make any changes going forward, you'll need to migrate your services to one of CenturyLink's newer VoIP services. The only change available to your legacy services will be the ability to modify the 911 address on those products that currently have that capability.

The good news is that CenturyLink offers multiple VoIP solutions with new technology, capabilities and features to enhance your communication experience including the following:

- Hosted VoIP
- IQ SIP Trunk (native SIP or PRI handoff)
- Core Connect Enterprise – Integrated Access
- Fiber + Integrated Access (IA)*
- Fiber+ Enterprise Integrated Access (IA)*

* Note: Services sold after December 31, 2015 have been provisioned on a newer VoIP platform and are still available.

ATTACHMENT A

We encourage you to reach out to your account team with any questions on the changes or to discuss alternatives to your current VoIP service.

At CenturyLink, we're committed to making it easy to do business with us, and provide you with secure, reliable connections when, where and how you need them. Add to that a relentless commitment to improving your experience with us, and we are your link to what's next.

Thank you for choosing CenturyLink—we value you as our customer.

The following statement is required by the Federal Communications Commission (FCC):

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) 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 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 (carrier's name). 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 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 Defense.



Marjorie Herlth

December 21, 2018

Kay Ivey
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600 Dexter Avenue
Montgomery, AL 36130

Alabama Public Service Commission
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Montgomery, AL 36130-4260

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Juneau, AK 99811-0001

Regulatory Commission of Alaska
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Anchorage, AK 99501-3469

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Executive Tower
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Phoenix, AZ 85007

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2996

Asa Hutchison
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Little Rock, AR 72201

Arkansas Public Service Commission
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Little Rock, AR 72203-0400

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Connecticut Public Utilities Regulatory
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Delaware Public Service Commission
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District of Columbia Public Service
Commission
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Georgia Public Service Commission
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Ramah, NM 87321

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Reservation of MT
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Browning, MT 59417

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Laguna, NM 87026

Kalispel Tribe of Indians
Glen Nenema
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Usk, WA 99180

Omaha Tribe of Nebraska
Michael Wolfe
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Zuni Tribe of the Zuni Reservation, New
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Secretary of Defense
Attn. Special Assistant for Telecommunications
Pentagon
Washington, DC 20301

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Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin	MikeW@badriver-nsn.gov
Burns Paiute Tribe	TribalCouncil@burnspaiute-nsn.gov
Cherokee Nation	bill-baker@cherokee.org
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Cocopah Tribe of Arizona	cocotcsec@cocopah.com
Confederated Salish & Kootenai Tribes of the Flathead Reservation	council@cskt.org
Confederated Tribes and Bands of the Yakama Nation	JoDe@yakama.com
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Confederated Tribes of Siletz Indians of Oregon	dpigsley@msn.com BrendaB@ctsi.nsn.us
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Confederated Tribes of the Colville Reservation	neeka.somday@colvilletribes.com
Confederated Tribes of the Grand Ronde Community of Oregon	cheryle.kennedy@grandronde.org
Confederated Tribes of the Umatilla Indian Reservation	garyburke@ctuir.org margaritebecenti@ctuir.org
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Ho-Chunk Nation of Wisconsin	wilfrid.cleveland@ho-chunk.com

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Iowa Tribe of Kansas and Nebraska	trhodd@iowas.org
Jamestown S'Klallam Tribe	rallen@jamestowntribe.org
Jena Band of Choctaw Indians	Chief@jenachoctaw.org
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Klamath Tribes	don.gentry@klamathtribes.com
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Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	jwildcatsr@ldftribe.com
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony, Nevada	btso@lvpaiute.com
Lower Brule Sioux Tribe of the Lower Brule Reservation, SD	Chairman@lbst.org
Lower Elwha Tribal Community	fgcharles@elwha.org
Lower Sioux Indian Community in the State of Minnesota	Brian.Pendleton@lowersioux.com
Lummi Tribe of the Lummi Reservation	Stan.Choate@CenturyLink.com
Makah Indian Tribe of the Makah Indian Reservation	brittany.olson@makah.com
Minnesota Chippewa Tribe - Bois Forte Band (Nett Lake)	Catherine.Chavers@boisforte-nsn.gov
Minnesota Chippewa Tribe - Fond du Lac Band	kevindupuis@fdlrez.com
Minnesota Chippewa Tribe - Grand Portage Band	norman@grandportage.com
Minnesota Chippewa Tribe - Leech Lake Band	Faron.Jackson@llojibwe.org burt.howard@llobo.org
Minnesota Chippewa Tribe - Mille Lacs Band	melanie.benjamin@millelacsband.com
Minnesota Chippewa Tribe - White Earth Band	terrence.tibbetts@whiteearth-nsn.gov
Minnesota Chippewa Tribe, Minnesota (Six component reservations: Bois Forte Band (Nett Lake); Fond du Lac Band; Grand Portage Band; Leech Lake Band; Mille Lacs Band; White Earth Band)	gfrazier@mnchippewatribe.org

Muckleshoot Indian Tribe	virginia.cross@muckleshoot.nsn.us
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Nez Perce Tribe	nptec@nezperce.org
Nisqually Indian Tribe	choke.ken@nisqually-nsn.gov
Oneida Nation	thill7@oneidanation.org
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Pascua Yaqui Tribe of Arizona	robert.valencia@pascuayaqui-nsn.gov
Port Gamble S'klallam Tribe	dwellman@pgst.nsn.us
Prairie Band Potawatomi Nation	Liana@pbnation.org
Prairie Island Indian Community in the State of Minnesota	daniel.derudder@piic.org blake.johnson@piic.org
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Puyallup Tribe of the Puyallup Reservation	angel.robertiello@puyalluptribe.com
Quechan Tribe of the Fort Yuma Indian Reservation - AZ & CA	executivesecretary@quechantribe.com
Quileute Tribe of the Quileute Reservation	renee.woodruff@quileutetribe.com
Quinault Indian Nation	fsharp@quinault.org
Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin	Richard.Peterson@redcliff-nsn.gov
Red Lake Band of Chippewa Indians	dseki@redlakenation.org

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