



Randy Clarke

Vice President Federal Regulatory Affairs
1099 New York Ave NW Suite #250
Washington, DC 20001
Tel: (202) 429-3116
Randy.Clarke@centurylink.com

Via ECFS

February 25, 2020

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

Re: *In the Matter of Applications Filed by Qwest Communications International Inc.
and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control;*
WC Docket No. 10-110

Dear Ms. Dortch:

In Appendix C of the Commission's March 18, 2011 Memorandum Opinion and Order in WC Docket No. 10-110, CenturyLink agreed that if it had plans to replace a Qwest Operational Support System (OSS) or integrate it with any other OSS, then at least 180 days before replacement or integration, CenturyLink would notify the FCC, affected states, and affected wholesale customers.¹ The proposed transition plan would be submitted to the Commission and the affected state regulators, and CenturyLink would seek input from affected wholesale local service customers on the plan. Attached is such a transition plan.

CenturyLink plans to consolidate Exchange Service (wholesale local service) ordering to streamline procedure and systems across CenturyLink's ILEC geography. As a result of the CenturyLink-Qwest merger, CenturyLink currently operates two separate and disparate systems

¹ See *In the Matter of Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control*, 26 FCC Rcd 4194, 4218, at Appendix C, WC Docket No. 10-110, FCC 11-47 (Rel. Mar. 18, 2011).

for the purchase of Exchange Services, including unbundled network elements and resale.² Each system is associated with delivery of service in a particular geography. As a result, wholesale customers who operate in multiple markets across CenturyLink's broad network currently must utilize both systems.

During 2020 CenturyLink seeks to transition all Local Service Request (LSR) order processing to its Electronic Administration & Service Order Exchange (EASE) system.³ The attached plan outlines CenturyLink's planned methodical migration of order processing off the Interconnect Mediated Access (IMA) system and onto the EASE system across all markets and geographies by October 16, 2020.

The benefits include:

- Single standardized order entry channel for Local Service Request submissions
- Standardized process for Local Service Request handling and fulfillment
- Single view of all pending Local Service Requests
- One set of training requirements

CenturyLink's plan includes contingency actions that would be executed if and when unforeseen problems are encountered during the transition. The plan was prepared by information technology professionals with substantial experience and knowledge regarding legacy CenturyLink and legacy Qwest systems, processes, and technical requirements. The plan brings CenturyLink systems into closer alignment with industry standards. CenturyLink wholesale local service customers (CLECs) have been given the opportunity to supply input to the plan via the CenturyLink Change Management Process. On January 23, 2020 the Plan was sent to representatives of 294 companies, each of whom is a CenturyLink wholesale local services customer. On January 22, 2020 the plan was shared with wholesale local service customers during a conference call attended by 43 representatives of 14 companies. In response to CenturyLink's request for input, one company subsequently supplied written feedback. CenturyLink is responding to that customer now. Interaction will be ongoing.

² The Commission has proposed to modify its unbundling rules for OSS. *See In the Matter of Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services*, WC Docket No. 19-308, Notice of Proposed Rulemaking, FCC 19-119, ¶¶ 83-85 (Nov. 25, 2019). Until those rules are modified, CenturyLink will continue to fully comply with the Commission's current OSS rules.

³ This proposed consolidation will have no impact on CenturyLink's OSS used to process Access Service Requests for Exchange Access services.

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
February 25, 2020
Page 3

CenturyLink is also providing this notice to representatives of state regulatory commissions in the impacted states. Please contact the undersigned with any questions regarding this notice.

Sincerely,

/s/ Randy Clarke
Randy Clarke