

ATTACHMENT A

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
Section 63.71 Application of)

Level 3 Telecom of Washington, LLC)

For Authority Pursuant to Section 214 of)
the Communications Act of 1934, as)
amended, to Discontinue the Provision of)
Certain VoIP Services)
_____)

WC Docket No. _____

**SECTION 63.71 APPLICATION OF
LEVEL 3 TELECOM OF WASHINGTON, LLC**

Level 3 Telecom of Washington, LLC (FRN: 0004-3515-32), a Lumen company,¹ seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, to discontinue certain voice services (the Affected Services) in Vancouver, Washington. Our lease for the physical space used to provide the Affected Services is expiring and we therefore must vacate that space.

Level 3 Telecom of Washington, LLC provides the following information pursuant to Section 63.71 of the Commission’s Rules:

1. Name and Address of the Carrier

Level 3 Telecom of Washington, LLC
100 CenturyLink Drive
Monroe, LA 71203

¹ Level 3 Telecom of Washington, LLC is a competitive local exchange carrier subsidiary of Lumen Technologies, Inc. (f/k/a CenturyLink, Inc.) (FRN: 0018-6268-53). This application is filed on behalf of, and is limited to, Level 3 Telecom of Washington, LLC.

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2. Date of Planned Service Discontinuance

Level 3 Telecom of Washington, LLC plans to discontinue the Affected Services on November 15, 2021, or as soon thereafter as any necessary regulatory approvals are obtained.

3. Points of Geographic Areas of Service Affected

Level 3 Telecom of Washington, LLC proposes to discontinue the Affected Services in Vancouver, Washington.

4. Description of Services Affected

The Affected Services provided by Level 3 Telecom of Washington, LLC are:

- **Managed IP Trunks** is a managed application provisioned across a customer's Local Area Network (LAN) and the Level 3 IP Core.
- **Managed IP Trunks Legacy** is a managed application provisioned across a customer's Local Area Network (LAN) and the Level 3 IP Core.

Level 3 Telecom of Washington, LLC and its affiliates will continue to provide the Affected Services in all other areas where they are currently provided.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers

Level 3 Telecom of Washington, LLC sent a written notification of the planned discontinuance to customers affected by the proposed discontinuance in accordance with Section 63.71(a) of the Commission's Rules. Customer notifications were sent by U.S. Mail or United Parcel Service on September 7, 2021. A copy of the notification is attached to this application (Attachment A).

6. Whether the Carrier is Considered Dominant or Non-dominant with Respect to the Service to be Discontinued

Level 3 Telecom of Washington, LLC is considered non-dominant with respect to the services to be discontinued.

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7. Other Information

In accordance with Section 63.71(a) of the Commission's Rules, a copy of this application is being mailed concurrently with its filing to the entities listed on the attached certificate of service.

CONCLUSION

The public convenience and necessity will not be adversely affected by the discontinuance of the services described herein. Advance notice has been provided to all affected customers, giving them ample time to arrange substitute services, which are readily available and include, but are not limited to, other services offered by other Lumen affiliates. Therefore, Level 3 Telecom of Washington, LLC respectfully requests that the Commission approve this Section 63.71 application.²

Respectfully submitted,

**LEVEL 3 TELECOM OF WASHINGTON,
LLC**

By: *Craig J. Brown*
Craig J. Brown *by mh*
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Craig.J.Brown@Lumen.com

Its Attorney

October 11, 2021

² This discontinuance is not a "technology transition," as defined in 47 C.F.R. § 63.60(i), as Lumen is not proposing to discontinue a TDM-based voice service.



Important Notice Regarding the Planned Discontinuance of Certain Voice Services Provided by Level 3 Telecom of Washington, LLC, a Lumen Company

Dear [REDACTED],

At Level 3 Telecom of Washington, LLC, a Lumen Company, our goal is to provide you with great quality and value while remaining competitive. Changing market conditions require that we continually evaluate our prices, product offerings and infrastructure.

Level 3 Telecom of Washington, LLC will no longer be able to provide the services identified below in Vancouver, Washington as our lease for physical space used to provide these services will expire soon requiring us to vacate that space. Therefore, we are writing to inform you that, as of November 15, 2021, or as soon after that date as authorized by the Federal Communications Commission and the state regulatory commission, if required, the affected services will be discontinued in these cities.

In order to maintain continuous service at your location, we would like to work with you to migrate your existing service to a similar service or, alternatively, a state-of-the-art platform that will provide your business with greater flexibility, simplicity, and efficiency.

You are receiving this notice because you currently subscribe to one of the following services provided by Level 3 Telecom of Washington, LLC, which we must discontinue, subject to regulatory approval.

- **Managed IP Trunks and Managed IP Trunks Legacy** are managed applications provisioned across a customer's Local Area Network (LAN) and the Level 3 IP Core.

If you have not made arrangements with Lumen or another telecommunications service provider to replace your voice service listed above prior to November 15, 2021, please be advised that your service will be disconnected on or after November 15, 2021, provided that the FCC and state commission, if required, approve the planned discontinuance. However, you must contact your account team or submit a disconnect order to billing for the disconnected service.

The point of contact for this transition will be your Account Manager. Your Account Manager is [REDACTED] and can be reached at [REDACTED], or by email at [REDACTED]@lumen.com. If you would like to designate an operational contact with respect to this matter, please provide his or her contact information as soon as possible.

If you subscribe to other services from Lumen, those services will NOT be impacted by the anticipated discontinuance of the affected services listed above. Your other services will remain in place with no change to the applicable rates, terms, or conditions. When the affected services are discontinued, we will automatically apply any deposits or credits, if applicable, to your Level 3 Telecom invoice. If the amount of the invoice is less than any deposits and credits, the company will issue a refund for the remaining balance. We will not assess termination liability for termination of the affected services, so please consider disconnecting service at your earliest possible convenience.

We value your business and appreciate your cooperation regarding this notice.

Thank you,

Level 3 Telecom of Washington, LLC

The following statement is required by the FCC:

The FCC will normally authorize this proposed discontinuance 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 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 of Washington, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

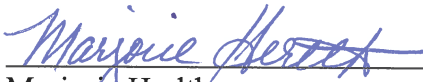
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CERTIFICATE OF SERVICE

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 Governor of the State listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commission listed on the attached service list; and
- (4) Served via first-class U.S. Mail, postage prepaid, on the Special Assistant for Telecommunications under the Secretary of Defense¹.



Marjorie Herlth

October 11, 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. CenturyLink did not identify any Tribal Nations in the geographic area covered by this Application.

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Jay Inslee
Office of the Governor
P. O. Box 40002
Olympia, WA 98504-0002

Washington Utilities and Transportation
Commission
P. O. Box 47250
Olympia, WA 98504-7250

Department of Defense
Chief Information Officer
Pentagon
Washington, DC 20301