

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

NOTICE OF CESSATION OF CERTAIN
TELECOMMUNICATIONS SERVICES BY
LEVEL 3 TELECOM OF WASHINGTON,
LLC.

DOCKET NO. UT-

**NOTICE OF CESSATION OF
TELECOMMUNICATIONS SERVICE**

- 1 Pursuant to WAC 480-120-083, Level 3 Telecom of Washington, LLC (Level 3) a CenturyLink company, hereby provides notice of the cessation of certain voice and data services as more specifically described in an application filed with the FCC pursuant to Section 214(a) for authorization to discontinue these services.
- 2 Level 3 will discontinue certain voice and data services (the Affected Services) in Bellevue, Bothell, Redmond, Seattle, Tukwila and Woodinville, Washington. The lease for the physical space from which Level 3 provides the Affected Services is expiring, and Level 3 must vacate that space.
- 3 The Affected Services provided by Level 3 Telecom of Washington, LLC in Bellevue, Bothell, Seattle and Woodinville, Washington are:
- **Business Line Service (Flat, Message and Measured)** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.
 - **VersiPak Lines and Trunks Service** is the voice portion of an integrated, multi-service, packet-based access service that delivers voice and data services over a single DS1.
 - **VersiPak Flex® T Service and VersiPak Power® T Service** are bundled services consisting of local exchange service with select features
 - **VersiPak Flex T-12** provides 12 business lines or terminals on DS1 access.

- **VersiPak Flex T-24** provides 24 business lines or terminals on DS1 access.
- **VersiPak Power T-12** provides 12 analog or digital trunks with the remainder to be used for Internet Access, not to exceed a DS1 minimum.
- **VersiPak IPRI Service** is an integrated, packet-based access solution designed to deliver PRI and Internet services over a single DS1.
- **VersiPak Mach2 Service and VersiPak Mach3 Service** consist of integrated voice and Internet bandwidth.

4 The Affected Service provided by Level 3 Telecom of Washington, LLC in Bellevue, Bothell, Redmond, Seattle and Tukwila, Washington are:

- **Analog PBX Trunk** provides Customer with a single, voice-grade telephonic communications channel that can be used to place or receive one call at a time. Analog PBX Trunk Service provides a connection from a Customer-provided PBX to the public switched telecommunications network (PSTN).
- **Digital PBX Trunk** Digital PBX Trunk Service provides a Customer with connection to the Company switch via a DS1 digital fiber optic transmission facility operating at 1.544 Mbps. Digital PBX Trunks are provided for connection of Customer-provided PBX equipment or trunk capable key systems to the Company switch. Customers must have the ability to terminate a DS1 signal.
- **Managed IP Trunks** is a managed application provisioned across a customer's Local Area Network (LAN) and the Level 3 IP Core

5 CenturyLink will continue to provide the Affected Services in all other areas where they are currently provided.

6 The FCC filing was made on June 23, 2020, with discontinuance to occur on September 15, 2020, or as soon as regulatory approvals are obtained. A copy of that application, which includes a customer notice, is provided as Attachment A. It was also sent separately to this Commission on the date of filing.

7 The following sets forth the information regarding notifications required by WAC 480-120-083.

8 Subsection (2)(a) of the rule requires notification to the Commission at least 30 days in advance. This notice is provided on July 6, 2020, which is more than 30 days prior to the scheduled September 15, 2020 discontinuance and therefore meets that requirement.

9 Subsection (2)(b) requires notice to the state 911 program if certain identified services, including local exchange service, are discontinued. The State Emergency Management Department is copied on this notice.

10 Subsection (2)(c) requires notice to customers, including any resellers, at least 30 days in advance. CenturyLink has notified its customers in Washington on June 15, 2020. The notice was provided more than 30 days prior to the discontinuance. Thus, CenturyLink's customer notice satisfies subsection (2)(c).

11 Subsections (2)(d) and (e) apply if the exiting carrier is supplied by other carriers, and does not apply in this case.

12 Subsection (2)(f) requires notice to the numbering administrator if numbers are to be returned. In this case Level 3 will not be returning numbers – affected customers can port their numbers to another carrier, and Level 3 is not completely discontinuing service in the state, so no NANPA notice was provided in this case.

13 Subsection (3) requires the Commission notice to contain certain information. Paragraph (3)(c) requires the number of customers for each telecommunications service. There are 22 current customers in Washington, all of them business customers. The specific breakdown is one customer in Woodinville, three in Bothell, one in Redmond, five in Bellevue, ten in Seattle, and two in Tukwila.

14 Subsection (4) requires the customer and Commission notice to contain certain information. A copy of the customer notice is provided as part of Attachment A. It contains the information required under Subsection (4) of the rule. The notice instructs

the customer to submit a disconnect order or contact the account team regarding terminating the services. The customer will automatically be credited for unused services after the customer sends in a disconnect order. CenturyLink plans to fulfill the other requirements of (4) by providing the customer with a second notice at least 10 days in advance of the discontinuance date.

- 15 Subsections (5) through (8) contain requirements for notices which do not currently apply to this cessation of services.
- 16 Subsection (9) requires notice to the Commission and the state 911 program if there are active customers of services listed in subsection (2)(b) who have not migrated their services on the discontinuance date. Level 3 will track this and provide notice if that situation exists on the day the services are discontinued.

Respectfully submitted this 6th day of July 2020.

LEVEL 3 TELECOM OF WASHINGTON, LLC

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