

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 Voice and Data 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)¹ a CenturyLink company, 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 and data services (the Affected Services) in Bellevue, Bothell, Redmond, Seattle, Tukwila and Woodinville, Washington. CenturyLink's lease for the physical space from which it provides the Affected Services is expiring, and CenturyLink must vacate that space.

CenturyLink 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 is a subsidiary of 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

CenturyLink plans to discontinue the Affected Services on September 15, 2020, or as soon thereafter as any necessary regulatory approvals are obtained.

3. Points of Geographic Areas of Service Affected

CenturyLink proposes to discontinue the Affected Services Bellevue, Bothell, Redmond, Seattle, Tukwila and Woodinville, Washington.

4. Description of Services Affected

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.

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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

CenturyLink 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

CenturyLink 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 on June 15, 2020. 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

CenturyLink is considered non-dominant with respect to the services to be discontinued.

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.

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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 CenturyLink affiliates. Therefore, CenturyLink 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 mk*
CenturyLink, Inc.
1099 New York Avenue, NW
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Washington, DC 20001
Phone 303-992-2503
Craig.J.Brown@CenturyLink.com

Its Attorney

June 23, 2020

² Although CenturyLink proposes in this application to discontinue certain TDM-based voice services, this discontinuance is not a “technology transition,” as defined in 47 C.F.R. § 63.60(i), as the affected customers can choose to switch to another TDM-based voice service provided by CenturyLink, as well as other alternatives offered by CenturyLink and its competitors.



100 CenturyLink Drive
Monroe, LA 71203
www.centurylink.com

Date

Billing Account Number:

NAME

ADDRESS

ADDRESS

ADDRESS

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

Dear <Customer Name>,

At CenturyLink, 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 Bellevue, Bothell, Redmond, Seattle, Tukwila or Woodinville, Washington as our lease for physical space will expire soon and Level 3 Telecom must vacate the space. Therefore, we are writing to inform you that as of September 15, 2020, 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 order to maintain continuous service at your location, CenturyLink 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 or more of the services listed below provided by Level 3 Telecom of Washington, LLC, which we must discontinue, subject to regulatory approval.

The following services will be discontinued in Bellevue, Bothell, Seattle and Woodinville, Washington:

- **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.

And these additional services will be discontinued in Bellevue, Bothell, Redmond, Seattle and Tukwila, Washington:

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- **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

If you have not made arrangements with CenturyLink or another provider to replace your voice service listed above prior to September 15, 2020, please be advised that your service will be disconnected on or after September 15, 2020, 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.

- Existing contracts for these services will not be renewed.
- Customers may retain their Service until September 15, 2020.
- Contracts that expire after September 15, 2020 must be cancelled due to the current situation.

The CenturyLink point of contact for this transition will be your CenturyLink Account Manager. Your Account Manager is «AM_Name» and can be reached at «AM_Phone», or by email at «AM_Email». 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 CenturyLink, 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, the Company will automatically apply any credits for the service to your CenturyLink invoice. CenturyLink will not assess termination liability for termination of said service(s), so please consider disconnecting your 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;
- 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

June 23, 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.

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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

Confederated Tribes and Bands of the Yakama Nation
Confederated Tribes of the Chehalis Reservation
Confederated Tribes of the Colville Reservation
Cowlitz Indian Tribe
Hoh Indian Tribe
Jamestown S'Klallam Tribe
Lower Elwha Tribal Community
Lummi Tribe of the Lummi Reservation

Makah Indian Tribe of the Makah Indian Reservation
Muckleshoot Indian Tribe
Nisqually Indian Tribe
Port Gamble S'klallam Tribe
Puyallup Tribe of the Puyallup Reservation
Quileute Tribe of the Quileute Reservation
Quinault Indian Nation
Skokomish Indian Tribe
Snoqualmie Indian Tribe
Spokane Tribe of the Spokane Reservation
Squaxin Island Tribe of the Squaxin Island Reservation
Suquamish Indian Tribe of the Port Madison
Reservation

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