

Via ECFS

December 20, 2023

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Re: *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 planned 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 will notify the FCC, affected states, and affected wholesale customers, file its proposed transition plan with the Commission and the affected states, and seek input from affected wholesale customers on such transition plan."<sup>1</sup> Attached is a CenturyLink plan to transition and consolidate certain billing systems.<sup>2</sup>

CenturyLink plans to consolidate Local Service Billing systems to streamline procedures and systems across CenturyLink's ILEC geography. As a result of the CenturyLink-Qwest merger, CenturyLink currently operates two different billing systems for Local Services, including certain unbundled network elements and resale. Each system is associated with service

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<sup>1</sup> See *Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control*, WC Docket No. 10-110, Memorandum Opinion and Order, at Appendix C, 26 FCC Rcd 4194, 4218 (2011).

<sup>2</sup> In 2020, the Commission determined that its unbundling rules no longer require ILECs to provide OSS, except where unbundled OSS is used to manage other UNEs, local interconnection, or local number portability. *Modernizing Unbundling and Resale Requirements in an Era of Next Generation Networks and Services*, WC Docket 19-308, Report and Order, 35 FCC Rcd 12425, 12494 (2020). In that and other orders, the Commission also significantly curtailed other Section 251 unbundling and resale obligations. See, e.g., *Petition of USTelecom for Forbearance*, WC Docket No. 18-141, Memorandum Opinion and Order, 34 FCC Rcd 6503 (2019) (eliminating analog loop unbundling and avoided-cost resale obligations nationwide). These decisions call into question the ongoing scope and applicability of the OSS merger commitments noted above. In an abundance of caution, however, CenturyLink is submitting this notice.

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delivery in a particular geography. Thus, customers who subscribe to CenturyLink services in multiple markets across CenturyLink's network may be receiving bills from both systems, making this inefficient for the customer and for CenturyLink.

During 2024, CenturyLink seeks to transition all Local Service billing to its Ensemble system, including billing currently handled by CenturyLink's Customer Records Information System (CRIS). The enclosed plan outlines CenturyLink's planned methodical migration of billing off CRIS and onto Ensemble across all markets and geographies.

The benefits include:

- Single process for Local Service Request billing functions
- Consistent billing levels – i.e., grouping of accounts across states
- Consistent methods to view the billing for any products and services ordered on a Local Service Request
- Consistent bill format for all local billing

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. CenturyLink wholesale local service customers (CLECs) have been given the opportunity to supply input to the plan via the CenturyLink Change Management Process. On June 19, 2023, the Plan was sent to representatives of 431 companies, each of which is a CenturyLink wholesale local services customer. On July 12, 2023, the plan was shared with wholesale local service customers during a conference call attended by 48 CLEC representatives. Interaction with the CLECs is ongoing.

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.

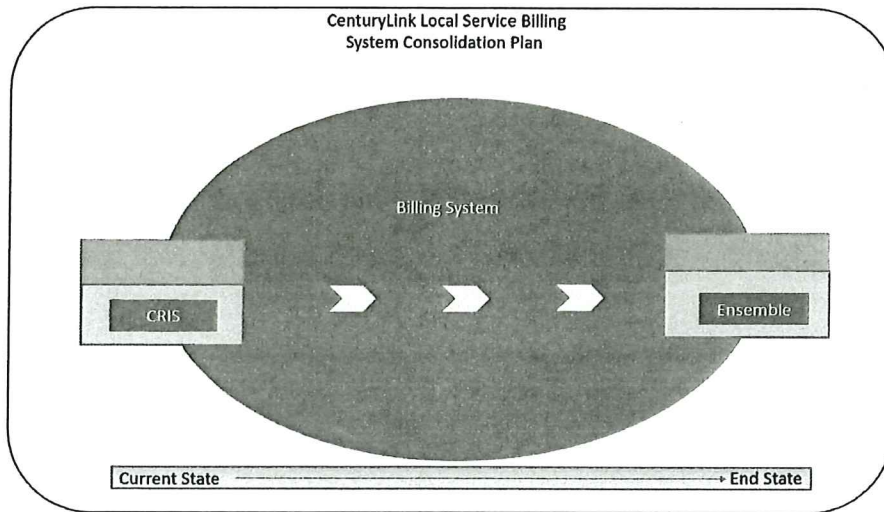
Sincerely,

/s/ Craig J. Brown  
Craig J. Brown

Enclosure



## CenturyLink Local Service Billing System Consolidation Plan



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# 1 Executive Summary

CenturyLink is consolidating Local Service billing systems to streamline processes and systems across CenturyLink's markets (hereafter, Consolidation). Due to Acquisitions (see Section 1.3), CenturyLink currently operates two different billing systems for Local Services. As a result, customers that are in multiple locations within CenturyLink's network could be receiving bills from both systems making this inefficient for the customer and for CenturyLink.

During consolidation, CenturyLink will move all billing to Ensemble. (Refer to Section: 2: Ordering and Billing System Description for more information.) This consolidation will move properties off the Customer Records Information System (CRIS).

The benefits to the wholesale customers and CenturyLink of consolidating the billing systems across all CenturyLink Markets are to provide:

- Single process for Local Service Request billing functions
- Consistent billing levels – i.e. grouping of accounts across states
- Consistent method to view the billing for any products and services ordered on an Local Service Request
- Consistent bill format for all local billing

To reduce the risks associated with a conversion, the conversion will be implemented by bill periods.

## 1.1 Scope

The CenturyLink Local Service Billing System Consolidation Plan (hereafter; the Consolidation Plan) document provides CenturyLink's wholesale customers, (hereafter; Customers) with further information about the Consolidation and how they will be affected.

The purpose of this document is to cover the scope of the Consolidation Plan to fulfill specific requirements of settlement agreements with various parties, as well as associated state commission and FCC orders, related to the CenturyLink/Qwest merger (hereafter, Merger Requirements). This document summarizes the critical milestones that will occur when CenturyLink consolidates the Current State Billing Systems into the End State solution. The Consolidation is planned for no earlier than May 2024

### 1.1.1.1 Items Not in Scope:

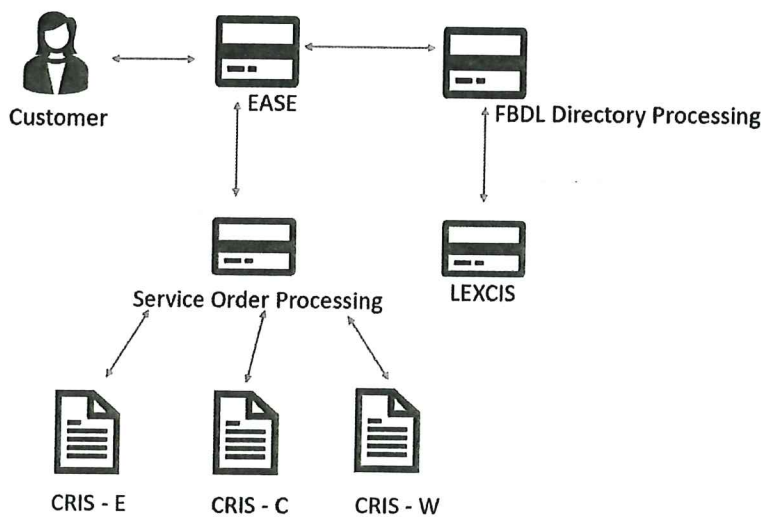
Items that are not in-scope for this project include, but are not limited to:

- System enhancements to EASE
- Access Service Request (ASR) processing

## 2.1 Current State System View

CenturyLink currently uses two separate Billing Systems. CenturyLink uses both CRIS and Ensemble for billing. The diagram below depicts the current state system view for Ordering and CRIS Billing.

Current State System View



### 2.1.1.1 Service Delivery

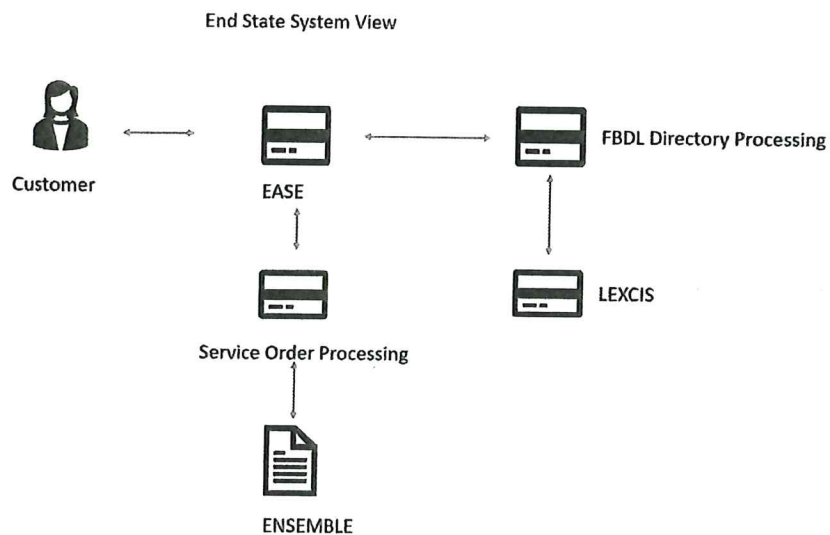
EASE interfaces to an application called FTS, which constructs an order in one of three regionalized core-ordering applications, called Service Order Processors (SOPs). The SOPs create the Universal Service Order, used by the Telcordia suite of provisioning systems to establish service.

### 2.1.1.2 Billing

## 2.2 End State System View

### 2.2.1 Transition to common processes and system infrastructure

The following diagram depicts the End State Ordering and Billing System for all CenturyLink Markets.



### 2.2.2 Ensemble

Ensemble is the end state system that bills customers for services ordered through Local Service Requests. EASE will continue to utilize a Service Order Processor for provisioning the service. Once completed, Billing records in Ensemble are created. Ensemble also supports the directory listing fulfillment and billing processes.

Ensemble is the billing system application that is used to set up new customer accounts, facilitate billing services, set up Directory Listings, view customer information and many other customer-related services.

### 2.2.3 Ordering

The following table shows key capabilities of the System.

CRIS to Ensemble Billing System Integration	
Key Capabilities	Description
Online Bill View	CenturyLink will provide the Customer with an external link for up to 13 months of bill invoices. The Customer will be able to sign up for this access. This history will be built going forward after Consolidation.  The current tool is My Account and will be moving to Control Center.
Media Options	Ensemble provides multiple options for receiving bills. Options include paper, online bill viewing, and EDI standard files.
Invoices	CenturyLink will continue to provide industry compliant invoices. Refer to separate attachment for <a href="#">Appendix A: Appendix-A: Ensemble Invoice &amp; CSR Examples</a> Ensemble Invoice & CSR Examples.

**Note:** Technical, legal and regulatory changes may affect information provided in the above table. The table above does not reflect changes made following the introduction of this document in CMP.

### 2.3.3 Billing System Differences between CRIS to Ensemble

#### 2.3.3.1 BANS

Ensemble uses a nine digit account number (i.e. 123456789), whereas CRIS uses a TN number format for the Billing Account Number (BAN). CenturyLink will provide the BAN conversion information prior to consolidation.

#### 2.3.3.2 Bill Summary

Account, department, and sub-department summaries are available in the bill.

#### 2.3.3.3 RSID/ZCID

Values from CRIS will be carried over to Ensemble.

**Note:** Technical Specifications will explain any electronic billing file differences, if applicable.



CLEC Comments for Interface Tech Specs	10/9/2023
Final Interface Tech Specs	10/13/2023
L&P Volume Testing	11/20/2023
(New) GUI Initial Release notice	12/7/2023
(New) GUI Draft Release notes	12/22/2023
Product Process Notification associated with Level 2 OSS changes	12/22/2023
CLEC comments due on (New) GUI Release Notes	12/25/2023
CLEC comments due on Level 2 OSS Product Process changes	12/29/2023
Training available	12/29/2023
GUI Final Release Notice	12/29/2023
Final Notice For Level 2 OSS Product/Process Changes	1/5/2024
Customer Testing Begins with Local Service Request Consolidation Functionality (120 Days)	1/12/2024
Customer Testing Ends	5/13/2024
Customer Go/No Go Vote	5/16/2024
Release to Production (by state or grouping of states) Pilot	5/20/2024
Conversion By Cycle 1	6/3/2024
Conversion By Cycle 2	6/10/2024
Conversion By Cycle 3	6/17/2024

### 3.2 3<sup>rd</sup> Party Facilitator

In accordance with the Merger Requirements, CenturyLink will contract with a 3<sup>rd</sup> Party Facilitator to coordinate between companies during planning and execution of Customer Testing. Refer to Section 3.3.33-3.3: Customer Testing.

The 3<sup>rd</sup> Party Facilitator will be engaged in 3Q2023. The CLECs will have the opportunity for input on the 3<sup>rd</sup> Party Facilitator requirements. The Facilitator will assist in Customer Testing scenario development and be available during the 120-day Customer Testing period which begins in 1Q2024.<sup>1</sup>

### 3.3 Consolidation Plan Implementation

This section provides further details on the Consolidation Plan implementation, including testing, training, conversion plan, and contingency planning.

<sup>1</sup> See *In the Matter of the Joint Petition for Approval of Indirect Transfer of Control of Qwest Operating Companies to CenturyLink, Minnesota Public Utilities Commission*, Docket No. p-421, et al./PA-10-456, Settlement Agreement between the Joint Petitioners and Joint CLECs, March 4, 2011.

that is in use for that customer prior to the conversion. The customers bill cycle will play a role in the cut to ensure billing is not underway during the conversion. The Ensemble application will then be in use for that customer post-conversion.. The Consolidation will be coordinated with the customer.

Customers' will receive notifications of the Consolidation's maintenance window. There will be a live bridge open at CenturyLink with key CenturyLink resources that will be available to immediately investigate and address any concerns once the production systems are back online. Customers will receive issue ticket logging and escalations processes prior to the Consolidation weekend. At Consolidation, all existing products billed in CRIS will convert and all new bills will be generated from Ensemble for the impacted region.

### 3.3.5 Post Conversion Support

Post conversion support staff will be available to assist key operational functions including ordering centers, care functions, provisioning operation centers and billing teams with any post-conversion issues. The support team will include program, IT and functional SMEs. Internal status meetings will be conducted regularly to monitor progress. Customers will be supported by their normal operations centers. CenturyLink will ensure its staffing and training plans will accommodate post conversion support needs.

### 3.3.6 Contingency Plan

At the beginning of the maintenance window the account will be flagged in CRIS as in Embargo, to block any activities. The accounts will be extracted and sent to Ensemble for loading. Once the account is loaded, the account will be removed from CRIS.

In the event of an issue during conversion. The account impacted will be backed out of Ensemble and the Embargo flag will be removed from CRIS, putting the account back in normal service in CRIS all during the planned maintenance window.

## Appendix B: Regulatory Organizations, Guidelines and Standards

The following is a list of regulatory organizations, guidelines and industry standards mentioned in this document.

- CMP (CenturyLink Change Management Process)
  - <http://www.centurylink.com/wholesale/cmp/review.html>
- FCC (Federal Communications Commission)
  - [www.fcc.gov/](http://www.fcc.gov/)
- PUC (Public Utility Commissions)
  - The following link is to the National Association of Regulatory Utility Commissioners. You will be able to obtain information about Public Utilities Commissions by State  
<http://www.naruc.org/Commissions/>

## Appendix D: Document Authors

The table below lists the qualifications of the document authors including information technology professionals with substantial experience and knowledge regarding CenturyLink systems, process, and requirements.

Title	Years of Telco Experience	Service in CenturyLink	Service in Qwest	Role in Preparation of Consolidation Plan
Business Analyst	2	0	0	Business Analyst
SR Manager Software Engineering	34	9	11	Robotics Process Automation
Dir. Sales Enablement	15	12	5	Customer portal assurance
Sr Process Analyst	28	4	28	SD Wholesale Order Entry Process Support
SR TECHNICAL PROCESS ARCHITECT	18	9	9	Support
Lead Billing Analyst	23	9	14	statement production and distribution
Lead Product Manager Portal	28	28		Control Center
Principl Architect	43	2	2	system architect
Sr Process Analyst	44	10	34	Wholesale Compliance, PID/PAP, ICA, Contractural, Regulatory Reporting & Metrics
Business Analyst	10	3	0	Business Analyst on Project
Manager Reporting & Metrics	25	9	14	Reporting & metrics
SR Manager Software Engineering	34	34	11	Manager of Robotics Process Automation team
SR MGR Service Delivery	45	10	35	Process Mapping and Order Entry
Sr Lead Solution Architect	28		18	Solutioning
Manager Billing	25	25	5	Billing Suuprt
Sr Project Manager, Enterprise CFS	25	7	0	Project Manager help with back end systems
Software Development Manager	16	12	4	BQS BDT formatting
Government Operations Director	42	10	32	Wholesale Compliance, PID/PAP, ICA, Contractural, Regulatory Reporting & Metrics
Sr. Billing Analyst	25	9	12	Reporting & metrics
Sr Technical Architect	34	9	25	Support
Lead Project Manager	22	1	0	Project Lead of the C2E migration
Enterprise Architect	36	10	10	Consulting to the Project
Delivery Project Executive - Luman	24	24	0	Lead Technical Project Manager
Techincal Process Architect II	43	9	34	Support

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing Letter to be served  
via first-class United States Mail, postage prepaid, upon the following: \_\_\_\_\_

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