## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

NOTICE OF CESSATION OF BUSY LINE VERIFICATION AND BUSY LINE INTERRUPT OPERATOR SERVICES PURSUANT TO WAC 480-120-083 FOR QWEST CORPORATION D/B/A CENTURYLINK QC Docket No.: UT-

## NOTICE OF CESSATION OF TELECOMMUNICATIONS SERVICE

- Pursuant to WAC 480-120-083<sup>1</sup>, Qwest Corporation d/b/a CenturyLink QC
  (CenturyLink) hereby provides notice of the cessation of a service known as Operator
  Verification/Interrupt, and Busy Line Verification and Busy Line Interrupt. The service
  is currently offered by CenturyLink QC in its local terms of service, Catalog No. 2,
  Section 6.2.8. It will be discontinued on October 10, 2016.
- 2 This service is an incidental service that allows business and residence customers to obtain assistance in determining if a called line is in use (verification) or in interrupting a communication in progress (interrupt) by calling the "0" operator. Customers incur a per-use charge each time a called line is verified or interrupted.
- 3 The service is being discontinued due to lack of demand and the high costs of maintaining the service. The demand for the service is less than 120 calls per month, on a base of nearly 800,000 lines. During the time for which data is currently available, August 2015-July 2016, CenturyLink QC processed 1,340 customer requests for verification. Of these, 87 callers requested an interrupt after the verification. In addition, CenturyLink QC has changed to a different operator service provider because the former

<sup>&</sup>lt;sup>1</sup> A copy of the text of this rule is included as Attachment A for ease of reference.

provider declined to renew its contract with CenturyLink QC. Continuing to provide the verification and interrupt services through the new operator services provider would require CenturyLink to maintain special trunks at significant expense<sup>2</sup> unwarranted by the extremely low demand for these services.

- 4 CenturyLink's other affiliated local exchange companies in Washington have discontinued this service effective July 8, 2016. See, Docket Nos. UT-160766, 160767, and 160768. During the consideration of those filings, several Public Service Answering Points (PSAPs) commented on the potential usefulness of the service in connection with emergency response issues. However, in a review of usage in the second quarter of 2016, CenturyLink's vendor identified no usage by the PSAPs. CenturyLink has discontinued this service in most of its other states, has removed it from its FCC tariffs, and has discontinued it as a wholesale offering. Other companies, including AT&T, have discontinued the service in their exchange areas as well. Finally, the service is not offered or available for VoIP calls, or for wireless calls which now represent the vast majority of 911 calls.
- 5 The following sets forth the information regarding notifications required by WAC 480-120-083.
  - Subsection (2)(a) of the rule requires notification to the Commission at least 30 days in advance of the discontinuance. This filing is being made with the Commission on August 25, 2016, which is more than 30 days prior to the scheduled October 10, 2016 discontinuance and thus it satisfies subsection (2)(a).
  - Subsection (2)(b) deals with 911 services, and does not apply to this service.

<sup>&</sup>lt;sup>2</sup> CenturyLink has estimated that the annual statewide cost of maintaining the dedicated trunking network that supports these services is approximately \$500,000. CenturyLink has offered to provide this service on a subscription basis to emergency responders, but they have stated that they cannot shoulder that cost.

- Subsection (2)(c) requires notice to customers, including any resellers, at least 30 days in advance. CenturyLink is notifying Customers of cessation of the service through bill messages in August 2016, and again in September of 2016. Because all customers will be notified in August and September, and because October 10, 2016 is the scheduled discontinuance, CenturyLink's customer notice satisfies subsection (2)(c).<sup>3</sup>
- Subsections (2)(d) and (e) apply if the exiting carrier is supplied by other carriers, and does not apply in this case.
- Subsection (2)(f) requires notice to the numbering administrator if numbers are to be returned. Because no numbers are to be returned with this cessation of service, no subsection (2)(f) notice is required.
- Subsection (3) requires the Commission notice to contain certain information.
  Paragraph (3)(c) requires the number of customers for each telecommunications service. Over a nine-month period, CenturyLink QC has received a total of 1,126 requests for this service. Paragraph (3)(c) requires the location described by exchange or by city and county for each telecommunications service being ceased. The service has no fixed locations because it is not a subscription service. Instead, the service is provided incidentally as, and when requested.
- Subsection (4) requires the customer and Commission notice to contain certain information. A copy of the notice that is included in customers' August 2016 bills is provided as Attachment B. It contains the information required under Subsection (4) of the rule. Because the service is provided incidentally when

<sup>&</sup>lt;sup>3</sup> It should be noted that the August customer notice states that the service will be discontinued on October 7, 2016. However, in order to accomplish the second notice in the September bill cycle, and still have all notices complete at least 10 days before the cessation, CenturyLink has changed the discontinuance date to October 10, 2016, and that date will be reflected in the September bills.

requested and billed after the service is provided, the notice requirement in paragraph (4)(c) of the rule related to customer refunds for any unused service is not applicable, and was not addressed in CenturyLink's customer notice. CenturyLink plans to fulfill the other requirements of (4) by including a second notice in customers' September 2016 bill.

- Subsections (5) and (6) do not apply to CenturyLink's cessation of Operator
  Verification/Interrupt and Busy Line Verification/Busy Line Interrupt services.
- Subsection (7) contains requirements for the notice to the numbering administrator which do not apply to CenturyLink's cessation of Operator Verification/Interrupt and Busy Line Verification/Busy Line Interrupt services.
- Subsections (8) and (9) do not apply to CenturyLink's cessation of Operator
  Verification/Interrupt and Busy Line Verification/Busy Line Interrupt services.

Respectfully submitted this 25<sup>th</sup> day August, 2016.

## CENTURYLINK

Lisa A. Anderl, WSBA #13236 1600 7th Avenue, Room 1506 Seattle, Washington 98191 Telephone: (206) 345-1574