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FILED 5/26/2020
DOCUMENT NO. 02744-2020
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Assistant General Counsel

VIA ECFS

May 18, 2020

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Amendment - Section 63.71 Application of Level 3 Telecom For Authority
Pursuant to Section 214 of the Communications Act of 1934, As Amended, to
Grandfather the Provision of Enterprise SIP Trunking – WC Docket No. 20-33

Dear Ms. Dortch:

By this letter, CenturyLink amends its application seeking to grandfather the provision of Enterprise SIP Trunking, filed on January 29, 2020 in the above-referenced docket (Application).

CenturyLink amends the Application by requesting an effective date of June 30, 2020 and clarifying that the application seeks to grandfather the Affected Service, and not to discontinue the service at this time. A copy of the Notice of clarification to Customers, mailed on April 22, 2020 is attached hereto.

Please contact me should you have any questions.

Sincerely,

/s/ Craig J. Brown

Copy (via email) to: Kimberly Jackson (Kimberly.Jackson@fcc.gov)
Copy via First-Class U.S. Mail, Postage Prepaid, Certificate of Service

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2020 MAY 26 PM 12: 29
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100 CenturyLink Drive
Monroe, Louisiana 71203

DATE

«Customer_name» Billing Account Number: « BAN »
«Address_1»
«Address_2»
«Address_3»
«City», «State» «Zip»

Important Notice Regarding the Planned Grandfathering of Enterprise SIP Trunking Provided by Level 3 Telecom, a CenturyLink Company

Dear «Customer_contact_name»:

On January 27, 2020, Level 3 Telecom notified you by letter of its intent to grandfather its Enterprise SIP Trunking service. This letter corrects an error in the January 27th notice and replaces and supersedes that notice.

At CenturyLink, our goal is to provide you with great quality and value while still remaining competitive. Changing market conditions require that we continually evaluate our prices, product offerings and infrastructure.

Occasionally our evaluation directs us to make changes to some products; therefore we are writing to inform you that CenturyLink is grandfathering the Enterprise Session Initiation Protocol (SIP) Trunking product offered by its Level 3 Telecom affiliates in Alabama, Arkansas, Arizona, California, Colorado, Connecticut, the District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, North Carolina, Nebraska, New Jersey, New Mexico, Nevada, New York, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, and Wisconsin. This action is necessary because the equipment associated with this service has been discontinued by the manufacturer and is no longer supported.

Enterprise SIP Trunking is a Voice over Internet Protocol (VoIP) service that allows the sharing of SIP call paths across two redundant IP-PBX platforms and provides bi-directional Business Continuity and Disaster Recovery functionality.

As of June 30, 2020, or as soon after that date as authorized by the Federal Communications Commission and relevant state regulatory commissions, Level 3 Telecom's Enterprise SIP Trunking product will no longer be available to new customers or for new orders from existing customers.

Service to existing customers of this service will be grandfathered as follows:

- Existing contracts for this service will not be renewed.
- Customers with a contract may retain this service on a month-to-month basis once that contract expires.

Please be aware that there are various options to replace your current service with an alternate CenturyLink service. For example, CenturyLink's Voice Complete service would be an ideal replacement if you have three or more locations that will share unlimited Concurrent Call Pathways (CCPs) and it supports a hybrid environment of TDM or IP handoffs. If you are looking for additional feature packages, IQ SIP would be a great fit. IQ SIP offers up to 120,000 shared CCPs with an enhanced portal experience.

Functional Component	IQ SIP	Voice Complete
Customer Size Sweet Spot	10-500 employees	500+ employees
Max Call Paths	200,000	Unlimited
Shared Call Paths	✓	✓
Local and LD/National Calling	✓	✓
Switched TF/Freephone	✓	✓
International Origination	Not Available	✓
International Termination	✓	✓
Countries Supported	United States Only	US, UK, France, Germany, Belgium, Netherlands
Managed SBC Provided	✓ (available with data bundle)	Not Available
Geographically independent TNs	✓	✓
Failover Protection Included	✓	✓
PRI Handoff	✓	✓ (native)
Self-Service Portal	✓	✓
TN and CCP Ordering in the Portal	✓ (near real time)	✓
Voice Encryption/TLS	✓	Not Available
Nomadic 911 self-service in Portal	✓	✓

You are encouraged to migrate now to another CenturyLink service, to avoid risk of business disruption due to network service unavailability if the equipment should go down.

We understand that this is an inconvenience, but we are confident that our team can seamlessly manage the entire process to provide your business with a better communications solution.

If you subscribe to other services from CenturyLink, those services will NOT be impacted by the anticipated grandfathering of the Enterprise SIP Trunking product. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We would like to work with you as soon as possible to ensure we update your service and continue our valued relationship, so please contact your account manager or our toll-free

customer service number 800-871-9244 to speak with a sales contact for options that are available to you.

Thank you for your cooperation and prompt attention to this notice.

Sincerely,

CenturyLink
800-871-9244 (Toll Free Number)
www.CenturyLink.com

N-20-xxx

The following statement is required by the FCC:

The FCC will normally authorize this proposed reduction or impairment 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 reduction or impairment of service. 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, a CenturyLink Company. Comments should include specific information about the impact of this proposed reduction or impairment of service upon you or your company, including any inability to acquire reasonable substitute service.

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing **SECTION 63.71**

APPLICATION (letter amendment) to be:

- 1) Filed with the Secretary of the FCC via ECFS;
- 2) Served via first-class U.S. Mail, postage prepaid, on the Governors of the States listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commissions 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

May 18, 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.

Kay Ivey
Office of the Governor
600 Dexter Avenue
Montgomery, AL 36130

Alabama Public Service Commission
P. O. Box 304260
Montgomery, AL 36130-4260

Doug Ducey
Office of the Governor
Executive Tower
1700 West Washington Street
Phoenix, AZ 85007

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2996

Asa Hutchison
Office of the Governor
500 Woodlane Street
Little Rock, AR 72201

Arkansas Public Service Commission
P. O. Box 400
Little Rock, AR 72203-0400

Gavin Newsom
Office of the Governor
c/o State Capitol
Suite 1173
Sacramento, CA 95814

California Public Utilities Commission
California State Building
505 Van Ness Avenue
San Francisco, CA 94102-3298

Jared Polis
Office of the Governor
136 State Capitol
Denver, CO 80203-1792

Colorado Public Utilities Commission
Suite 250
1560 Broadway
Denver, CO 80202

Ned Lamont
Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Connecticut Public Utilities Regulatory
Authority
10 Franklin Square
New Britain, CT 06051

Muriel Bowser
Executive Office of the Mayor of the
District of Columbia
1350 Pennsylvania Avenue, N.W.
Suite 316
Washington, DC 20004

District of Columbia Public Service
Commission
1325 G Street, N.W.
Suite 800
Washington, DC 20005

Ron DeSantis
Office of Governor
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Brian Kemp
Office of the Governor
206 Washington Street
111 State Capitol
Atlanta, GA 30334

Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-9052

Brad Little
Office of the Governor
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Boise, ID 83720

Idaho Public Utilities Commission
P. O. Box 83720
Boise, ID 83720-0074

J.B. Pritzker
Office of the Governor
207 State House
Springfield, IL 62706

Illinois Commerce Commission
Suite C-800
160 North LaSalle Street
Chicago, IL 60601

Eric Holcomb
Office of the Governor
Statehouse
Indianapolis, IN 46204-2797

Indiana Utility Regulatory Commission
PNC Center
Suite 1500 E
101 West Washington Street
Indianapolis, IN 46204

Laura Kelly
Office of the Governor
Capitol
300 SW 10th Avenue, Suite 241S
Topeka, KS 66612-1590

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Matt Bevin
Office of the Governor
700 Capitol Avenue, Suite 100
Frankfort, KY 40601

Kentucky Public Service Commission
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Frankfort, KY 40602-0615

John Bel Edwards
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Baton Rouge, LA 70804

Louisiana Public Service Commission
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Baton Rouge, LA 70821-9154

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Annapolis, MD 21401-1925

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Baltimore, MD 21202-6806

Gretchen Whitmer
Officer of the Governor
P. O. Box 30013
Lansing, MI 48909

Michigan Public Service Commission
P. O. Box 30221
Lansing, MI 48909

Tim Walz
Office of the Governor
116 Veterans Service Building
20 W. 12th Street
St. Paul, MN 55155

Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

Mike Parson
Office of the Governor
P. O. Box 720
Jefferson City, MO 65102

Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102-0360

Pete Ricketts
Office of the Governor
Lincoln Office/State Capitol
P. O. Box 94848
Lincoln, NE 68509-4848

Nebraska Public Service Commission
Suite 300
1200 N Street
Lincoln, NE 68508

Steve Sisolak
Office of the Governor
State Capitol Building
101 N. Carson Street
Carson City, NV 89701

Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109

Phil Murphy
Office of the Governor
P. O. Box 001
Trenton, NJ 08625

New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

Michelle Lujan Grisham
Office of the Governor
490 Old Santa Fe Trail, Room 400
Santa Fe, NM 87501

New Mexico Public Regulation Commission
Attn: Mr. Mike Ripperger
1120 Paseo de Peralta
P. O. Box 1269
Santa Fe, NM 87504

Andrew M. Cuomo
Office of the Governor
NYS State Capitol Building
Albany, NY 12224

New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Roy Cooper
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

Mike DeWine
Office of the Governor
Riffe Center, 30th Floor
77 South High Street
Columbus, OH 43215-6117

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Kate Brown
Office of the Governor
900 Court Street, NE
Suite 160
Salem, OR 97301

Public Utility Commission of Oregon
P. O. Box 1088
Salem, OR 97308-1088

Tom Wolf
Office of the Governor
508 Main Capitol Building
Harrisburg, PA 17120

Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Henry McMaster
Office of the Governor
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Columbia, SC 29201

Public Service Commission of South
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101 Executive Center Drive
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Columbia, SC 29210

Bill Lee
Office of the Governor
State Capitol, 1st Floor
Nashville, TN 37243

Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Greg Abbott
Office of the Governor
P. O. Box 12428
Austin, TX 78711-2428

Public Utility Commission of Texas
1701 N. Congress Avenue
P. O. Box 13326
Austin, TX 78711-3326

Ralph Northam
Office of the Governor
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Richmond, VA 23218

Virginia State Corporation Commission
P. O. Box 1197
Richmond, VA 23218

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

Tony Evers
Office of the Governor
115 East Capitol
Madison, WI 53702

Public Service Commission of Wisconsin
P. O. Box 7854
Madison, WI 53707-7854

Phil Bryant
Office of the Governor
P. O. Box 139
Jackson, MS 39205

Mississippi Public Service Commission
501 N. West Street, Suite 201A
Woolfolk Building
Jackson, MS 39201-1174

Gary Herbert
Office of the Governor
350 North State Street, Suite 200
P. O. Box 142220
Salt Lake City, UT 84114-2220

Public Service Commission of Utah
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111

Minnesota Chippewa Tribe – Grand Portage
Band
Beth Drost
PO Box 428
Grand Portage MN 55606

Prairie Island Indian Community in the State
of Minnesota
Daniel Derudder
Blank Johnson
5636 Sturgeon Lake Rd.
Welch MN 55089

Puyallup Tribe of the Puyallup Reservation
Angel Robertiello
3009 E. Portland Ave.
Tacoma WA 98404-4926

Shakopee Mdewakanton Sioux Community
of Minnesota
Dawn Blanchard
2330 Sioux Trail NW
Prior Lake MN 55372

Department of Defense
Chief Information Officer
Pentagon
Washington, DC 20301

Quechan Tribe of the Fort Yuma Indian Reservation
Tohono O'odham Nation of Arizona
Tonto Apache Tribe of Arizona
Yavapai-Apache Nation of the Camp Verde Indian Reservation
Yavapai-Prescott Indian Tribe
Nez Perce Tribe
Seminole Tribe of Florida (Big Cypress and Brighton Reservations)
Shoshone-Bannock Tribes of the Fort Hall Reservation
Southern Ute Indian Tribe of the Southern Ute Reservation, CO
Ute Mountain Ute Tribe
Coushatta Tribe of Louisiana
Grand Traverse Band of Ottawa and Chippewa Indians, Michigan
Iowa Tribe of Kansas and Nebraska
Jena Band of Choctaw Indians
Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas

Prairie Band Potawatomi Nation
Sac and Fox Nation of Missouri in Kansas and Nebraska
Sault Ste. Marie Tribe of Chippewa Indians, Michigan
Tunica-Biloxi Indian Tribe
Lower Sioux Indian Community in the State of Minnesota
Minnesota Chippewa Tribe - Bois Forte Band (Nett Lake)
Minnesota Chippewa Tribe - Fond du Lac Band
Minnesota Chippewa Tribe - Grand Portage Band
Minnesota Chippewa Tribe - Leech Lake Band
Minnesota Chippewa Tribe - Mille Lacs Band
Minnesota Chippewa Tribe - White Earth Band
Minnesota Chippewa Tribe, Minnesota (Bois Forte Band (Nett Lake); Fond du Lac Band; Grand Portage Band; Leech Lake Band; Mille Lacs Band; White Earth Band)
Prairie Island Indian Community in the State of Minnesota

Red Lake Band of Chippewa Indians
Upper Sioux Community, Minnesota
Omaha Tribe of Nebraska
Winnebago Tribe of Nebraska
Kewa Pueblo, New Mexico (Pueblo of Santo Domingo)
Pueblo of Acoma, New Mexico
Pueblo of Cochiti, New Mexico
Pueblo of Isleta, New Mexico
Pueblo of Nambe, New Mexico
Pueblo of Picuris, New Mexico
Pueblo of Pojoaque, New Mexico
Pueblo of San Felipe, New Mexico
Pueblo of San Ildefonso, New Mexico
Pueblo of Sandia, New Mexico
Pueblo of Santa Ana, New Mexico

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Burns Paiute Tribe	Eric.hawley@burnspaiute-nsn.gov ;
Confederated Tribes of Warm Springs	lynn.davis@wstribe.org ;
Confederated Tribes of the Grand Ronde Community of Oregon	cheryle.kennedy@grandronde.org ;
Confederated Tribes of Siletz Indians of Oregon	dpigsley@msn.com ;
Confederated Tribes of the Umatilla Indian Reservation	BrendaB@ctsi.nsn.us ;
Klamath Tribes	garyburke@ctuir.org ;
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony	margaritebecenti@ctuir.org ;
Shoshone-Paiute Tribes of the Duck Valley Reservation	don.gentry@klamathtribes.com ;
Confederated Tribes and Bands of the Yakama Nation	contact@lvpaiute.com ;
Confederated Tribes of the Chehalis Reservation	howard.tedl@shopai.org ;
Confederated Tribes of the Colville Reservation	JoDe@yakama.com ;
Cowlitz Indian Tribe	chairman@chehalistribe.org ;
Hoh Indian Tribe	wiyall@cowlitz.org ;
Jamestown S'Klallam Tribe	Bernard.Afterbuffalo@hohtribe-nsn.org ;
Lower Elwha Tribal Community	rallen@jamestowntribe.org ;
Lummi Tribe of the Lummi Reservation	fgcharles@elwha.org ;
Makah Indian Tribe of the Makah Indian Reservation	Stan.Choate@CenturyLink.com ;
Muckleshoot Indian Tribe	brittany.olson@makah.com ;
Nisqually Indian Tribe	virginia.cross@muckleshoot.nsn.us ;
Port Gamble S'klallam Tribe	choke.ken@nisqually-nsn.gov ;
Puyallup Tribe of the Puyallup Reservation	dwellman@pgst.nsn.us ;
Quileute Tribe of the Quileute Reservation	angel.robertiello@puyalluptribe.com ;
Quinault Indian Nation	renee.woodruff@quileutetribe.com ;
Skokomish Indian Tribe	fsharp@quinault.org ;
Snoqualmie Indian Tribe	gmillier@skokomish.org ;
Spokane Tribe of the Spokane Reservation	Jaime.Martin@snoqualmietribe.us ;
Squaxin Island Tribe of the Squaxin Island Reservation	carole@spokanetribe.com ;
Suquamish Indian Tribe of the Port Madison Reservation	acooper@squaxin.us ;
Confederated Tribes of the Colville Reservation	lforsman@suquamish.nsn.us ;
Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin	neeka.somday@colvilletribes.com ;
Forest County Potawatomi Community, Wisconsin	MikeW@badriver-nsn.gov ;
Ho-Chunk Nation of Wisconsin	Ned.DanielsJr@fcpotawatomi-nsn.gov ;
Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin	Marlon.WhiteEagle@ho-chunk.com ;
Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	dakota.walton-smith@ho-chunk.com ;
	louis.taylor@lco-nsn.gov ;
	jwildcatsr@ldftribe.com ;

Oneida Nation

Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin

St. Croix Chippewa Indians of Wisconsin

Paiute Indian Tribe of Utah (Cedar Band of Paiutes, Kanosh Band of Paiutes, Koosharem Band of Paiutes, Indian Peaks Band of Paiutes, and Shivwits Band of Paiutes)

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