



**CenturyLink™**

COPY

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Assistant General Counsel

**VIA ECFS**

May 18, 2020

RECEIVED

MAY 21 2020

PUBLIC SERVICE  
COMMISSION

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



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 27<sup>th</sup> 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 Defense<sup>1</sup>.

  
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Marjorie Herlth

May 18, 2020

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<sup>1</sup> 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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Arizona Corporation Commission  
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Washington, DC 20004

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

Ron DeSantis  
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The Capitol  
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Tallahassee, FL 32399

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Lincoln, NE 68508

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Carson City, NV 89701-3109

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Trenton, NJ 08625

New Jersey Board of Public Utilities  
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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

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Albany, NY 12224

New York State Public Service Commission  
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Raleigh, NC 27699-0301

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Public Utility Commission of Texas  
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Austin, TX 78711-3326

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Virginia State Corporation Commission  
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Washington Utilities and Transportation  
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Public Service Commission of Wisconsin  
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Jackson, MS 39205

Mississippi Public Service Commission  
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Gary Herbert  
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350 North State Street, Suite 200  
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Salt Lake City, UT 84114-2220

Public Service Commission of Utah  
Heber M. Wells Building  
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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  
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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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Cow Creek Band of Umpqua Tribe of Indians	<a href="mailto:vpense@cowcreek.com">vpense@cowcreek.com</a> ;
Gila River Indian Community of the Gila River Indian Reservation	<a href="mailto:executive.mail@gric.nsn.us">executive.mail@gric.nsn.us</a> ;
Lower Brule Sioux Tribe of the Lower Brule Reservation, SD	<a href="mailto:Chairman@lbst.org">Chairman@lbst.org</a> ;
Burns Paiute Tribe	<a href="mailto:Eric.hawley@burnspaiute-nsn.gov">Eric.hawley@burnspaiute-nsn.gov</a> ;
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Confederated Tribes of the Grand Ronde Community of Oregon	<a href="mailto:cheryle.kennedy@grandronde.org">cheryle.kennedy@grandronde.org</a> ;
Confederated Tribes of Siletz Indians of Oregon	<a href="mailto:dpigsley@msn.com">dpigsley@msn.com</a> ;
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Lower Elwha Tribal Community	<a href="mailto:fgcharles@elwha.org">fgcharles@elwha.org</a> ;
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Muckleshoot Indian Tribe	<a href="mailto:virginia.cross@muckleshoot.nsn.us">virginia.cross@muckleshoot.nsn.us</a> ;
Nisqually Indian Tribe	<a href="mailto:choke.ken@nisqually-nsn.gov">choke.ken@nisqually-nsn.gov</a> ;
Port Gamble S'klallam Tribe	<a href="mailto:dwellman@pgst.nsn.us">dwellman@pgst.nsn.us</a> ;
Puyallup Tribe of the Puyallup Reservation	<a href="mailto:angel.robertiello@puyalluptribe.com">angel.robertiello@puyalluptribe.com</a> ;
Quileute Tribe of the Quileute Reservation	<a href="mailto:renee.woodruff@quileutetribe.com">renee.woodruff@quileutetribe.com</a> ;
Quinault Indian Nation	<a href="mailto:fsharp@quinault.org">fsharp@quinault.org</a> ;
Skokomish Indian Tribe	<a href="mailto:gmilller@skokomish.org">gmiller@skokomish.org</a> ;
Snoqualmie Indian Tribe	<a href="mailto:Jaime.Martin@snoqualmietribe.us">Jaime.Martin@snoqualmietribe.us</a> ;
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**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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