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2020 MAY 26 A 8:29

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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



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

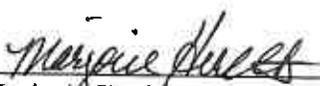
The following statement is required by the FCC:

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.

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Office of the Governor
600 Dexter Avenue
Montgomery, AL 36130

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

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Phoenix, AZ 85007

Arizona Corporation Commission
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Phoenix, AZ 85007-2996

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Arkansas Public Service Commission
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Little Rock, AR 72203-0400

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c/o State Capitol
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Sacramento, CA 95814

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

Jared Polis
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Denver, CO 80203-1792

Colorado Public Utilities Commission
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Denver, CO 80202

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

Connecticut Public Utilities Regulatory
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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
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The Capitol
400 S. Monroe St.
Tallahassee, FL 32399

Florida Public Service Commission
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Brian Kemp
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Illinois Commerce Commission
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Indiana Utility Regulatory Commission
PNC Center
Suite 1500 E
101 West Washington Street
Indianapolis, IN 46204

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

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Frankfort, KY 40601

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Louisiana Public Service Commission
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Minnesota Public Utilities Commission
121 7th Place East
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Jefferson City, MO 65102

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Jefferson City, MO 65102-0360

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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

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Columbus, OH 43215

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Public Utility Commission of Oregon
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Salem, OR 97308-1088

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Tennessee Regulatory Authority
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Public Utility Commission of Texas
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Olympia, WA 98504-0002

Washington Utilities and Transportation
Commission
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Public Service Commission of Wisconsin
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Madison, WI 53707-7854

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Mississippi Public Service Commission
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Gary Herbert
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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
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

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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

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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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Confederated Tribes of Siletz Indians of Oregon	dpigsley@msn.com ;
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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 ;
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Confederated Tribes of the Chehalis Reservation	howard.tedl@shopai.org ;
Confederated Tribes of the Colville Reservation	JoDe@yakama.com ;
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Hoh Indian Tribe	wiyall@cowlitz.org ;
Jamestown S'Klallam Tribe	Bernard.Afterbuffalo@hohtribe-nsn.org ;
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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	gmiller@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 ;
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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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