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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

APR 08 2019

PUBLIC SERVICE  
COMMISSION

In the Matter of )  
)  
)  
Section 63.71 Application of )  
)  
)  
CenturyLink Communications, LLC f/k/a )  
Embarq Communications, LLC and )  
CenturyLink Communications, LLC f/k/a )  
Qwest Communications Company, LLC )  
d/b/a CenturyLink QCC )  
)  
)  
For Authority Pursuant to Section 214 of )  
the Communications Act of 1934, As Amended, )  
to Discontinue the Provision of Certain Service )

**SECTION 63.71 APPLICATION**

CenturyLink Communications, LLC (FRN: 0018-4219-41), f/k/a Embarq Communications, LLC and also f/k/a Qwest Communications Company, LLC d/b/a CenturyLink QCC (referred to herein as “CenturyLink”) hereby applies for authority to discontinue service to its remaining customers of certain Voice over Internet Protocol (“VoIP”) services that have operated on a VoIP platform, known as Sylantro, that is no longer technically supported. CenturyLink requests authority from the Federal Communications Commission (“Commission”) to discontinue these services as of May 30, 2020.

This application is related to a prior Section 63.71 application filed by CenturyLink on August 21, 2018 and granted by operation of law on October 8, 2018, seeking to discontinue the same services covered by this application.<sup>1</sup> After filing the August 21, 2018 Application,

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<sup>1</sup> See *In the Matter of Section 63.71 Application of CenturyLink Communications, LLC f/k/a Embarq Communications, LLC and CenturyLink Communications, LLC f/k/a Qwest*

CenturyLink discovered that it had inadvertently failed to notify three customers of its Sylanro-based VoIP services. CenturyLink now seeks authority to discontinue service to those remaining customers.

CenturyLink submits the following information in support of its application:

**1. Name and address of carrier**

CenturyLink  
100 CenturyLink Drive  
Monroe, LA 71203

**2. Date of planned service discontinuance**

As of May 30, 2020, or as soon thereafter as the necessary regulatory approvals can be obtained, CenturyLink plans to cease offering the services supported by the Sylanro VoIP platform in the manner outlined below.

Pursuant to the Commission's grant of the August 21, 2018 Application, CenturyLink has already discontinued offering the services supported by the Sylanro VoIP platform to any new customers. The three customers covered by this application can maintain their existing Sylanro VoIP platform services for the duration of their current service contract term, but will not be able to make moves, adds or changes to those services. If one or more of these customers decides to move to the new platform, they will sign a new contract and CenturyLink will waive any early termination penalties on their old contract.

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*Communications Company, LLC d/b/a CenturyLink QCC For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue the Provision of Service, Section 63.71 Application, WC Docket No. 18-266 (filed Aug. 21, 2018) (August 21, 2018 Application); Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications Services and/or Interconnected VoIP Services, WC Docket No(s). 18-262, 18-264, 18-265, 18-266, DA 18-922 (rel. Sept. 7, 2018).*

**3. Points of geographic areas of service affected**

CenturyLink seeks authority to discontinue offering services supported by the Sylanro VoIP platform in all 50 states and Washington D.C.

**4. Brief description of the type of services affected**

The Sylanro VoIP platform has reached its end of life and CenturyLink is seeking to discontinue the VoIP service provided to these customers over that platform, specifically Internet Protocol Telephony Service (IPTelS).

Affected customers will be able to maintain their current product configurations for the duration of their current service terms. Customers will also be able to transition to other VoIP solutions offered by CenturyLink on a new VoIP platform with new technology, capabilities and features, such as Flexible Managed Network Services, which include Hosted VoIP service and IQ SIP Trunk.

**5. Brief description of the dates and methods of notice to all affected customers**

CenturyLink sent a written notification of the planned discontinuance to the customers affected by the proposed discontinuance in accordance with Section 63.71(a) of the Commission's Rules. Customer notifications were sent via email and U.S. Mail on February 27, 2019. A copy of the notification is attached to this application (Attachment A).

**6. Dominance of carrier with respect to the service to be discontinued**

CenturyLink is a non-dominant carrier with regard to services supported by the Sylanro VoIP platform.

**7. Service**

In accordance with 47 C.F.R. § 63.71(a), CenturyLink has mailed and/or emailed a copy of this application to the Governor and public utility commission of each of the affected states and jurisdictions identified in Paragraph 3 above, to any federally-recognized Tribal Nations with authority over the Tribal lands in the geographic areas identified in Paragraph 3 above, as well as to the Special Assistant for Telecommunications under the Secretary of Defense.

Respectfully submitted,

**CENTURYLINK**

By: *Craig J. Brown* *by mh*  
Craig J. Brown  
CenturyLink, Inc.  
1099 New York Avenue, NW  
Suite 250  
Washington, DC 20001  
Phone 303-992-2503  
[Craig.J.Brown@CenturyLink.com](mailto:Craig.J.Brown@CenturyLink.com)

Its Attorney

**DATE:** April 4, 2019

Qwest Government Services, Inc.  
dba CenturyLink QGS  
4250 N. Fairfax Drive  
Arlington, VA. 22203



February 27, 2019

[REDACTED]

**Attention:** [REDACTED]

[REDACTED]

**Reference:** [REDACTED]

**Subject:** Notification of Internet Protocol Telephony Service Discontinuation under Contracts

Dear [REDACTED]

On February 25, 2019, I sent a letter informing you that CenturyLink intends to grandfather and discontinue its commercial Internet Protocol Telephony Service (IPTeIS). We have discovered an error in that letter in a statement required by the Federal Communications Commission at the end of that letter. This letter corrects that error but is otherwise identical to the February 25 letter.

Pursuant to Section C.2.1 of the subject contracts, notification is hereby provided that CenturyLink intends to grandfather and discontinue in all 50 states and Washington, DC, the commercial Internet Protocol Telephony Service (IPTeIS) currently purchased from CenturyLink, via its contract with [REDACTED]<sup>1</sup> Contingent on necessary regulatory approvals, this grandfathering and discontinuance will be effective at the end of the period of performance for the [REDACTED] contracts referenced above. Currently, [REDACTED]

[REDACTED]

purchase IPTeIS under the [REDACTED] Contract, which has a performance period end date of March 28, 2020, and [REDACTED] purchases IPTeIS under the [REDACTED] Contract, which has a performance period end date of May 30, 2020. This action is part of CenturyLink's discontinuance of various VoIP services provided on an aging VoIP platform. Our decision to take this action is based on changing market conditions, including the retirement of technologies initially provided for service on the

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<sup>1</sup> The actual provider of IPTeIS is CenturyLink Communications LLC, f/k/a Embarq Communications, LLC and f/k/a Qwest Communications Company, LLC.

Qwest Government Services, Inc.  
dba CenturyLink QGS  
4250 N. Fairfax Drive  
Arlington, VA. 22203



**CenturyLink®**

██████████ contract. This letter supplements CenturyLink's notification of this proposed service discontinuance sent to ██████████ on December 14, 2018.

CenturyLink plans to recommend that agencies transition to a Hosted VoIP solution to ensure service continuity and our account teams are in the process of developing alternate solutions for these agencies. We will advise ██████████ when CenturyLink has obtained any necessary regulatory approvals.

The agencies impacted by this notification, their current services and monthly billings are identified below:



Please feel free to contact me with any additional information you deem necessary to execute a contract modification.

Sincerely,  
Qwest Government Services, Inc. dba CenturyLink QGS



Kathryn Elsner-Kerch, Senior Contract Manager-Federal

Qwest Government Services, Inc.  
dba CenturyLink QGS  
4250 N. Fairfax Drive  
Arlington, VA. 22203



**The following statement is required by the Federal Communications Commission (FCC):**

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) 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 discontinuance. 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 CenturyLink Communications, LLC formerly known as Embarq Communications, LLC and Qwest Communications, LLC d/b/a CenturyLink QCC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.


N-13-250

CERTIFICATE OF SERVICE

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

**APPLICATION** to be:

- 1) Filed with the Secretary of the FCC via ECFS (Inbox-Section 214 Domestic Discontinuance Application);
- 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.

  
\_\_\_\_\_  
Marjorie Herlth

April 4, 2019



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Burns Paiute Tribe	<a href="mailto:TribalCouncil@burnspaiute-nsn.gov">TribalCouncil@burnspaiute-nsn.gov</a>
Cherokee Nation	<a href="mailto:bill-baker@cherokee.org">bill-baker@cherokee.org</a>
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Cocopah Tribe of Arizona	<a href="mailto:cocotcsec@cocopah.com">cocotcsec@cocopah.com</a>
Confederated Salish & Kootenai Tribes of the Flathead Reservation	<a href="mailto:council@cskt.org">council@cskt.org</a>
Confederated Tribes and Bands of the Yakama Nation	<a href="mailto:JoDe@yakama.com">JoDe@yakama.com</a>
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Minnesota Chippewa Tribe - Leech Lake Band	<a href="mailto:Faron.Jackson@llojibwe.org">Faron.Jackson@llojibwe.org</a> <a href="mailto:burt.howard@llbo.org">burt.howard@llbo.org</a>
Minnesota Chippewa Tribe - Mille Lacs Band	<a href="mailto:melanie.benjamin@millelacsband.com">melanie.benjamin@millelacsband.com</a>
Minnesota Chippewa Tribe - White Earth Band	<a href="mailto:terrence.tibbetts@whiteearth-nsn.gov">terrence.tibbetts@whiteearth-nsn.gov</a>



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Navajo Nation, Arizona, New Mexico & Utah	<a href="mailto:russellbegaye@navajo-nsn.gov">russellbegaye@navajo-nsn.gov</a>
Nez Perce Tribe	<a href="mailto:nptec@nezperce.org">nptec@nezperce.org</a>
Nisqually Indian Tribe	<a href="mailto:choke.ken@nisqually-nsn.gov">choke.ken@nisqually-nsn.gov</a>
Oneida Nation	<a href="mailto:thill7@oneidanation.org">thill7@oneidanation.org</a>
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)	<a href="mailto:sparashonts@utahpaiutes.org">sparashonts@utahpaiutes.org</a>
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