



May 25, 2021

Brinda Westbrook-Sedgwick  
Commission Secretary  
District of Columbia Public Service Commission  
1333 H. Street, N.W.  
2nd Floor, Tower West  
Washington, D.C. 20005

**RE: Broadwing Communications, LLC Tariff Filing  
TA2000-35**

Dear Ms. Westbrook-Sedgwick:

CenturyLink submits this filing to modify its Broadwing Communications, LLC PSC D.C. Tariff No. 2. This filing is issued on May 25, 2021 to become effective on June 1, 2021.

This filing adds language pursuant to 47 C.F.R § 9.16(b)(3), pertaining to Ray Baum's Act. Specifically, these revisions document the requirements that multiline telephone systems and fixed and non-fixed voice services must be capable of conveying the dispatchable location of a 911 caller to a public safety answering point (PSAP). In recognition of customer obligations related to Ray Baum's Act, these revisions include indemnification provisions to which customers connecting MLTS to Company facilities and/or providing fixed or non-fixed services must adhere. Business customers have been notified of these changes.

If you need additional information, please contact me at [marla.hazlett@centurylink.com](mailto:marla.hazlett@centurylink.com) or at 303-992-5838.

Respectfully submitted,

A handwritten signature in cursive script that reads "Marla Hazlett".

Marla Hazlett

DC2021-02

**Marla Hazlett**  
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## SECTION 2 - REGULATIONS

### 2.1 Undertaking of the Company (cont'd.)

#### 2.1.4 Liability of the Company (cont'd.)

- J) The Company shall indemnify, defend, and hold harmless the Customer from and against all claims, actions, damages, liabilities, costs and expenses, including reasonable attorneys' fees, for any injury to persons or property, and any interruption of, interference to, or other defect in any service provided by the Company to any third party, if such injury, interruption, interference, or other defect was not caused by any negligent or intentional act or omission of the Customer or any of its officers, employees, agents, invitees, or contractors.
- K) Customer will defend and indemnify the Company, its affiliates, agents and contractors from all third party claims, liabilities, fines, penalties, costs and expenses, including reasonable attorneys' fees, arising from or related to customer's, customer's end user's or customer's third-party provider(s)' acts, omissions (including the failure to purchase or implement features that enable the receipt and transmission of direct-dial "911" calls or multi-line telephone system notifications), or failures of connectivity that impede, prevent or otherwise make inoperable the ability of the customer or its end users to directly dial "911" or to receive or transmit multi-line telephone system notifications, as required by law, in the United States.
- L) **Customer will defend and indemnify the Company, its affiliates, agents and contractors from all third party claims, liabilities, fines, penalties, costs and expenses, including reasonable attorneys' fees, arising from or related to any acts or omissions by the customer, customer's end users or customer's third-party provider(s) that cause, give rise to or bring about the non-compliance of the service with any applicable law, including the failure to purchase or implement features that enable compliance with laws.**

(N)  
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(N)

#### 2.1.5 Notification of Service-Affecting Activities

The Company will provide the Customer reasonable notification of service-affecting activities that may occur in normal operation of its business. Such activities may include, but are not limited to, equipment or facilities additions, removals or rearrangements and routine preventative maintenance. Generally, such activities are not specific to an individual Customer but affect many Customers' services. No specific advance notification period is applicable to all service activities. The Company will work cooperatively with the Customer to determine the reasonable notification requirements. With some emergency or unplanned service-affecting conditions, such as an outage resulting from cable damage, notification to the Customer may not be possible.

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ISSUED BY: Chantel Bosworth, Director-Government Operations  
100 CenturyLink Drive  
Monroe, LA 71203

## SECTION 2 - REGULATIONS

### 2.3 Obligations of the Customer (cont'd.)

#### 2.3.1 General (cont'd.)

#### **D) Multi-Line Telephone Systems**

- 1.** Pursuant to 47 CFR §9.16(b)(1) and (2), multi-line telephone systems connected to the Company's network which were manufactured, imported, sold, leased, or installed after February 16, 2020 must be configured to: (T)

- allow an end user to directly initiate a "911" call from any station equipped with dialing facilities, without dialing any additional digit, code, prefix, or post-fix, including any trunk-access code such as the digit 9, regardless of whether the user is required to dial such a digit, code, prefix, or post-fix for other calls, and
- provide MLTS notification to a central location at the facility where the system is installed or to another person or organization regardless of location, if the system is able to be configured to provide the notification without an improvement to the hardware or software of the system.

MLTS notification must (1) be initiated contemporaneously with the 911 call, provided that it is technically feasible to do so; (2) not delay the call to 911; and (3) be sent to a location where someone is likely to see or hear it.

Customers who connect multi-line telephone systems to the Company's facilities must agree to defend and indemnify the Company for acts and omissions resulting in non-compliance, as described in Section 2.1.4.K.

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## SECTION 2 - REGULATIONS

### 2.3 Obligations of the Customer (cont'd.)

#### 2.3.1 General (cont'd.)

##### **D) Multi-Line Telephone Systems**

**2 Pursuant to 47 C.F.R. § 9.16(b)(3), a person engaged in the business of installing MLTS may not install such a system in the United States unless it is configured such that it is capable of being programmed with and conveying the dispatchable location of the caller, as defined in 47 C.F.R. § 9.3, to the PSAP with 911 calls consistent with the requirements below. A person engaged in the business of managing or operating MLTS may not manage or operate such a system in the United States unless it is configured such that the dispatchable location of the caller, as defined in 47 C.F.R. §9.3, is conveyed to the PSAP with 911 calls consistent with the following requirements:**

- **On-premise fixed telephones associated with a MLTS must provide dispatchable location by January 6, 2021;**
- **No later than January 6, 2022, on-premise non-fixed telephones associated with a MLTS must provide dispatchable location where technically feasible, otherwise they shall provide dispatchable location based on end user manual update or on alternative location information as defined in 47 C.F.R. § 9.3;**
- **No later than January 6, 2022, off-premise non-fixed telephones associated with a MLTS must provide dispatchable location where technically feasible, otherwise they shall provide dispatchable location based on end user manual update, or enhanced location information which may be coordinate based and consisting of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost.**

(N)

(N)

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## SECTION 2 - REGULATIONS

### 2.3 Obligations of the Customer (cont'd.)

#### 2.3.1 General (cont'd.)

#### D) **Multi-Line Telephone Systems**

(N)

#### **2 (Cont'd)**

- **Additionally, providers of fixed telephony services shall provide automated dispatchable location with 911 calls beginning January 6, 2021 pursuant to 47 C.F.R. § 9.8. Providers of interconnected VoIP service must comply with the location requirements under 47 C.F.R. § 9.11(b)(iv) for non-fixed services as of January 6, 2022. Customers to DID Service capable of accessing 911 emergency services shall be responsible for providing automated dispatchable location information as defined in 47 C.F.R. § 9.3 and for maintaining the accuracy of that information for fixed services as of January 6, 2021 and for non-fixed services where technically feasible as of January 6, 2022.**
- **Customers, particularly private switch owners, private branch exchange owners, and customers of DID service, may need to purchase additional features or services to comply with the dispatchable location provisions of RAY BAUM's Act. Dispatchable location capability may require Customers to purchase private switch automatic location identification (PS/ALI) service from the Company or from a third-party provider.**

**Customers who connect multi-line telephone systems to the Company's facilities must agree to defend and indemnify the Company for acts and omissions resulting in non-compliance, as described in Section 2.1.4.L.**

(N)

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## SECTION 2 - REGULATIONS

### 2.4 Customer Equipment and Channels

#### 2.4.1 General

A) A User may transmit or receive information or signals via the facilities of the Company. The Company's services are designed primarily for the transmission of voice-grade telephonic signals, except as otherwise stated in this tariff. A User may transmit any form of signal that is compatible with the Company's equipment, but the Company does not guarantee that its services will be suitable for purposes other than voice-grade telephonic communication except as specifically stated in this tariff.

B) All multi-line telephone systems connected to the Company's network on or after February 16, 2020, must be configured to allow direct "911" dialing by any end user and must be configured to send MLTS notifications as described in Section 2.3.1.I.1.

(T)

C) **Multiline telephone systems ("MLTS") required to comply with F. preceding must be capable of conveying the dispatchable location of a 911 caller to a public safety answering point ("PSAP") as described in Section 2.3.1.I.2.**

(N)

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(N)

#### 2.4.2 Station Equipment

A) Terminal equipment on the User's Premises and the electric power consumed by such equipment shall be provided by and maintained at the expense of the User. The User is responsible for the provision of wiring or cable to connect its terminal equipment to the Company Point of Connection.

B) The Customer is responsible for ensuring that Customer-provided equipment connected to Company equipment and facilities is compatible with such equipment and facilities. The magnitude and character of the voltages and currents impressed on Company-provided equipment and wiring by the connection, operation, or maintenance of such equipment and wiring shall be such as not to cause damage to the Company-provided equipment and wiring or injury to the Company's employees or to other persons. Any additional protective equipment required to prevent such damage or injury shall be provided by the Company at the Customer's expense.

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