



**CenturyLink™**

RECEIVED  
DISTRICT OF COLUMBIA  
OFFICE OF THE  
COMMISSION SECRETARY

2019 NOV 15 AM 9:55

UD

OFFICE OF THE  
COMMISSION SECRETARY

**Jeanne W. Stockman**  
**Associate General Counsel**

14111 Capital Blvd

Wake Forest, NC 27587

Telephone: 984.237.1330

Jeanne.w.stockman@centurylink.com

November 14, 2019

**VIA OVERNIGHT COURIER**

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission of the District of Columbia  
1325 G Street, N.W.  
Suite 800  
Washington, D.C. 20005

Re: Application to Abandonment Certain Voice Services and Exit Plan

Dear Secretary Westbrook-Sedgwick:

On behalf of Broadwing Communications, LLC enclosed for filing please find an original and fifteen (15) copies of an Application to Abandon Certain Voice Services and Exit Plan.

If you have any questions, please do not hesitate to contact Sharon Alvarado at (303) 992-5836 or me at (984) 237-1330. Thank you.

Sincerely,

Jeanne W. Stockman

cc: Sharon Alvarado (*via electronic mail*)

**BEFORE THE  
DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION**

In the Matter of the Application of :  
Broadwing Communications, LLC's : Docket No.  
Plan to Abandon Certain Voice Services :

**APPLICATION TO ABANDON CERTAIN VOICE SERVICES AND EXIT PLAN**

**I. INTRODUCTION**

Pursuant to Title 15, Section 2705 of the District of Columbia Municipal Regulations,<sup>1</sup> Broadwing Communications, LLC (hereinafter "Broadwing") respectfully requests that the District of Columbia Public Service Commission ("Commission") approve the abandonment of certain local business telephone services provided by Broadwing in the District of Columbia. All affected services are provided to business customers only, Broadwing does not provide service to residential customers.

**II. INFORMATION REQUIRED BY 15 DCMR 2705**

In support of this Application, Broadwing provides the following exit plan information as required by 15 DCMR 2705.1 and 2705.2:

Broadwing Communications, LLC, 1025 Eldorado Boulevard, Broomfield, Colorado 80021, telephone number (303) 992-5836 or (318) 330-6450, fax number (720) 578-2911 or (318) 362-1727, provides these services under Certificate #13600, Docket # 892-T-3156 authorized on June 2, 2005. Broadwing proposes to abandon certain voice services within approximately 90 days of filing this Application;<sup>2</sup>

- (a) Due to changes in technology and market conditions, Broadwing has modified its focus and seeks to discontinue provisioning of switched-based local voice services throughout the District of Columbia while continuing to provide other services in the District of Columbia, including access services and certain private line services. Broadwing does not serve residential customers.

---

<sup>1</sup> 15 DCMR 2705

<sup>2</sup> To the extent the Application is approved pursuant to either 15 DCMR 2705.8 or 2705.9, Broadwing may discontinue services sooner than 90 days after filing, but in no event sooner than December 31, 2019.

*Description of Services Affected:* The following services are being discontinued for business customers:

- POTS services, including Basic Line Service, Basic Trunk (or PBX-type) Service, Remote Call Forwarding, & Digital Trunk Services
- Centrex-type Services
- Digital Data Services
- Integrated Voice and Data Service
- ISDN-PRI / ISDN-BRI Services
- Message Toll

While tariff provisions may vary by jurisdiction, the services to be discontinued and listed above may also include associated miscellaneous services, such as Custom Calling Features, Hunting, Caller ID Blocking, Toll Restriction Services, Operator Services, Directory Assistance, Listing Services, Intercept Services, and Direct Inward Dialing (DID) Numbers.

- (b) To the extent there are deposits, Broadwing will refund any deposits plus accrued simple interest and will credit balances after final billing upon discontinuance of service. No termination liabilities or penalties apply.
- (c) Broadwing does not propose to abandon the provisioning of telecommunications services in the District of Columbia in whole;
- (d) While Broadwing owns certain facilities associated with the services at issue and while this effort is part of an on-going effort to consolidate certain network facilities, the company is not proposing to abandon the market and therefore does not have an immediate plan to remove or transfer all facilities from this market.
- (e) Twenty-nine (29) retail and two (2) wholesale business customers in the District of Columbia are affected by the proposed abandonment of service;
- (f) No customers are affected by the proposed abandonment of service for whom Broadwing receives universal service support;
- (g) Broadwing first notified customers of the discontinuance of services by letters sent to impacted customers in July 2019. Since July, Broadwing has continued to work with the impacted business customers to transition to other providers or to services offered by Broadwing affiliates. Broadwing sent a second notice in October/November, 2019. See Attachment A for the customer notices (with customer information redacted). This partial abandonment will not deprive customers of necessary telecommunications services as Broadwing is a competitive carrier (i.e., CLEC) and such services are competitively provided in the state and elsewhere as a result of the 1996 Telecommunications Act.

Based on information and belief, these business customers have options from other providers.

- (h) On November 12, 2019, Broadwing filed its 214 application with the FCC and a copy was sent to the District of Columbia Public Service Commission. In accordance with Section 63.71(a) of the Rules of the Federal Communications Commission, customers were notified via United Parcel Service or regular U.S. mail on October 30, 2019 and November 6, 2019.
- (i) An affidavit verifying that all of the information in the application is true and correct is attached, see Attachment B.

### **CONCLUSION**

WHEREFORE, for the response stated above, Broadwing requests that the Commission grant this Application to Abandon Service and Exit plan pursuant to 15 DCMR §2705.1 and 2705.2.

Respectfully Submitted,



Jeanne W. Stockman, Esq.

CenturyLink

14111 Capital Boulevard

Wake Forest, North Carolina 27587

Tel: (984) 237-1330

Email: [jeanne.w.stockman@centurylink.com](mailto:jeanne.w.stockman@centurylink.com)

Attorney for Broadwing Communications, LLC

Dated: November 14, 2019

ATTACHMENT A



100 CenturyLink Drive  
Monroe, Louisiana 71203  
www.CenturyLink.com

October 30, 2019

Billing Account Number:

Customer Name  
Address  
Address  
Address

**Important Notice Regarding the Planned Discontinuance of Certain Traditional Voice & Data Services  
Provided by Broadwing Communications, LLC, a CenturyLink Company**

Dear Valued Customer,

At CenturyLink, our goal is to provide you with great quality and value while 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 Broadwing Communications, LLC, a CenturyLink Company, is discontinuing certain voice and data services, in Arkansas, California, Colorado, Connecticut, the District of Columbia, Delaware, Florida, Georgia, Illinois, Massachusetts, Maryland, Michigan, Minnesota, Missouri, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, Utah, Virginia and Washington as of December 31, 2019, or as soon after that date as authorized by the Federal Communications Commission and any other relevant state regulatory commissions.

You are receiving this notice because you currently subscribe to one or more of the following services provided by Broadwing Communications, LLC, which, subject to regulatory approval, will be discontinued as a result of this project.

- **Local Trunking Business Line Service including POTS (Plain Old Telephone Service)** voice-grade telephonic communications channels that are used to place or receive one call at a time.
- **Local Trunking PRI (Primary Rate Interface)** transmits and receives video, voice and data simultaneously.
- **Local Trunking Local Inbound** originates calls to CenturyLink provided telephone numbers, aggregate the traffic, and hands it off to single or multiple IP endpoints.
- **Local Trunking SIP (Session Initiation Protocol)** send and receive calls via the Internet.
- **Local Trunking ELS (Enhanced Local Services)** originates and terminates calls to and from CenturyLink provided telephone numbers, aggregates the traffic, and hands it off to single or multiple endpoints.
- **LD Outbound** traditional long distance 1+ or direct dialed domestic and international (U.S. origination) calling services provided over switched or dedicated facilities.
- **LD Toll Free and Contact Center** traditional long distance toll-free or 800 services, domestic and international (U.S. termination) calling services provided over switched or dedicated facilities.
- **Integrated Voice and Data Service (IVAD)** allows a customer to utilize a single high capacity facility to integrate both voice and data services. IVAD service is available in different groups of channels and at varying bandwidth speeds.
- **Integrated Voice and Data Service – DS3 Level (IVADs3)** a channelized DS3 facility that will allow a customer to combine both voice and data DS1s onto a single DS3 circuit. Voice circuits can be either digital DS1

## ATTACHMENT A

or ISDN PRI. Bandwidth for the data portion of this service is limited to 20Mbps per circuit. A minimum of nine DS1s is required for this service.

- **Private Line Service** provides a dedicated transmission path on a point-to-point basis.
- **Interstate Private Line Service** provides a dedicated transmission path on a point-to-point basis.

Upon receiving regulatory approvals, these services will no longer be available to new customers or for new orders from existing customers (except to the extent permitted by contract). As to existing services:

- Existing contracts for these services will not be renewed.
- Customers with a contract that expires *prior* to December 31, 2019 may retain their service(s) covered by that contract on a month-to-month basis until that date.
- Customers with a contract that expires *after* December 31, 2019, including option periods, may retain their service(s) covered by that contract until the expiration of the base contract and option periods.

In order to maintain continuous service at your location, CenturyLink would like to work with you to migrate your existing service to a similar service or, alternatively, a state-of-the-art platform that will provide your business with greater flexibility, simplicity, and efficiency.

You must initiate a migration order or submit a disconnect request with CenturyLink by December 31, 2019 to avoid possible disruption of your service based on the discontinuance schedule noted above, provided that CenturyLink obtains the necessary regulatory approvals for the planned discontinuance. Our Voice Advancement Team is here to help you through the migration or disconnect process. Contact them at 877-699-3201 or [voiceadvancement@centurylink.com](mailto:voiceadvancement@centurylink.com).

If you subscribe to other services from CenturyLink, those services will NOT be impacted by the anticipated discontinuance of the affected services listed above. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We value your business and appreciate your cooperation regarding this notice.

Thank you,

Broadwing Communications, LLC  
877-699-3201

### **The following statement is required by the FCC:**

The FCC will normally authorize this proposed discontinuance 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 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 Broadwing Communications, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.



«Customer\_name»

Billing Account Number: « BAN »

«Address\_1»

«Address\_2»

«City», «State» «Zip»

Dear «Customer\_contact\_name»,

We are contacting you to inform you that certain voice services provided by CenturyLink (formerly Level 3 Communications) will be discontinued and we would like to discuss new solutions to meet your business communications needs.

You are receiving this notice because you currently subscribe to one or more of the following services that are being discontinued as part of a network consolidation program resulting in a single, **next generation** CenturyLink platform that will provide your business with greater flexibility, simplicity and efficiency.

- **Local Trunking Business Line Service** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.
- **Local Trunking PRI** provides customers with the ability to transmit and receive video, voice and data simultaneously.
- **Local Trunking Inbound** offers the ability to originate calls to CenturyLink provided telephone numbers, aggregate the traffic, and hand it off to single or multiple IP endpoints.
- **LD Outbound** offers traditional long distance services.
- **Local Trunking SIP** enables an end point (phone system) to send and receive calls via the Internet.
- **Local Trunking ELS** originates and terminates calls to and from CenturyLink provided telephone numbers, aggregates the traffic, and hands it off to single or multiple endpoints.
- **LD Toll Free and Contact Center** provides traditional U.S. domestic and -international origination services that enable retail, healthcare, insurance, and call center enterprise, or any business with high volumes of toll-free traffic, to terminate their traffic to any dedicated or switched location globally.
- **1+ Dedicated and 1+ Switched** provides a comprehensive end to end solution for interstate, intrastate and international outbound voice service originated via switched or dedication access
- **800 Dedicated and 800 Switched** provides toll free terminations either via a dedicated termination or a switched ring-to-number termination.

You have options to replace your current service with an alternate CenturyLink voice service. We will be contacting you to assist in selecting a new service that meets your needs and to ensure a seamless and uninterrupted transition of your voice services. If you have any questions, please contact us at **VoiceAdvancement@centurylink.com** or **877-699-3201**.

**Your Affected Services are associated with the Billing Account Number listed above.**

We value your business and appreciate your attention regarding this notice.

ATTACHMENT A

Thank you,

CenturyLink







**CenturyLink**

November 6, 2019

Internal Qwest Contact  
1-Qwest International Distribution  
120 Lenora St, 11th Floor  
Seattle , WA 98121  
testmail@centurylink.com

TO: Internal Qwest Contact

100 CenturyLink Drive  
Monroe, Louisiana 71203  
www.CenturyLink.com

<b>Announcement Date:</b>	<b>November 6, 2019</b>
<b>Effective Date:</b>	<b>December 31, 2019</b>
<b>Notification Number:</b>	<b>GENL.ANNC.11.06.19.F.17807.BroadwingDiscontinuance</b>
<b>Notification Category:</b>	<b>Network Notification</b>
<b>Target Audience:</b>	<b>General Customers</b>
<b>Subject:</b>	<b>General: BroadwingDiscontinuance December 31, 2019</b>

**Important Notice Regarding the Planned Discontinuance of Certain Traditional Voice & Data Services Provided by Broadwing Communications, LLC, a CenturyLink Company**

At CenturyLink, our goal is to provide you with great quality and value while 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 Broadwing Communications, LLC, a CenturyLink Company, is discontinuing certain voice and data services, in Arkansas, California, Colorado, Connecticut, the District of Columbia, Delaware, Florida, Georgia, Illinois, Massachusetts, Maryland, Michigan, Minnesota, Missouri, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, Utah, Virginia and Washington as of December 31, 2019, or as soon after that date as authorized by the Federal Communications Commission and any other relevant state regulatory commissions.

You are receiving this notice because you currently subscribe to one or more of the following services provided by Broadwing Communications, LLC, which, subject to regulatory approval, will be discontinued as a result of this project.

- **Local Trunking Business Line Service including POTS (Plain Old Telephone Service)** voice-grade telephonic communications channels that are used to place or receive one call at a time.
- **Local Trunking PRI (Primary Rate Interface)** transmits and receives video, voice and data simultaneously.
- **Local Trunking Local Inbound** originates calls to CenturyLink provided telephone numbers, aggregate the traffic, and hands it off to single or multiple IP endpoints.
- **Local Trunking SIP (Session Initiation Protocol)** send and receive calls via the Internet.
- **Local Trunking ELS (Enhanced Local Services)** originates and terminates calls to and from CenturyLink provided telephone numbers, aggregates the traffic, and hands it off to single or multiple endpoints.
- **LD Outbound** traditional long distance 1+ or direct dialed domestic and international (U.S. origination) calling services provided over switched or dedicated facilities.
- **LD Toll Free and Contact Center** traditional long distance toll-free or 800 services, domestic and international (U.S. termination) calling services provided over switched or dedicated facilities.
- **Integrated Voice and Data Service (IVAD)** allows a customer to utilize a single high capacity facility to integrate both voice and data services. IVAD service is available in different groups of channels and at varying bandwidth speeds.
- **Integrated Voice and Data Service – DS3 Level (IVADs3)** a channelized DS3 facility that will allow a customer to combine both voice and data DS1s onto a single DS3 circuit. Voice circuits can be either digital DS1 or ISDN PRI. Bandwidth for the data portion of this service is limited to 20Mbps per circuit. A minimum of nine DS1s is required for this service.

Upon receiving regulatory approvals, these services will no longer be available to new customers or for new orders from existing customers (except to the extent permitted by contract). As to existing services:

- Existing contracts for these services will not be renewed.
- Customers with a contract that expires *prior* to December 31, 2019 may retain their service(s) covered by that contract on a month-to-month basis until that date.
- Customers with a contract that expires *after* December 31, 2019, including option periods, may retain their service(s) covered by that contract until the expiration of the base contract and option periods.

In order to maintain continuous service at your location, CenturyLink would like to work with you to migrate your existing service to a similar service or, alternatively, a state-of-the-art platform that will provide your business with greater flexibility, simplicity, and efficiency.

You must initiate a migration order or submit a disconnect request with CenturyLink by December 31, 2019 to avoid possible disruption of your service based on the discontinuance schedule noted above, provided that CenturyLink obtains the necessary regulatory approvals for the planned discontinuance. Our Voice Advancement Team is here to help you through the migration or disconnect process. Contact them at 877-699-3201 or [voiceadvancement@centurylink.com](mailto:voiceadvancement@centurylink.com).

If you subscribe to other services from CenturyLink, those services will NOT be impacted by the anticipated discontinuance of the affected services listed above. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We value your business and appreciate your cooperation regarding this notice.

Thank you,

Broadwing Communications, LLC  
877-699-3201

**The following statement is required by the FCC:**

The FCC will normally authorize this proposed discontinuance 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 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 Broadwing Communications, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

N-19-189

Sincerely,

Qwest Corporation dba CenturyLink QC

Note: To view your Centurylink Wholesale notifications online, please log into our ANR (Accessible Notices Repository) at : <https://notices.centurylink.com>.

If you would like to subscribe, unsubscribe or change your current profile to CenturyLink Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at:  
<http://www.centurylink.com/wholesale/notices/cnla/maillist.html>

cc: < SalesManagerName >  
< VoiceTraderName >  
< ServiceManagerName >

© 2019 CenturyLink. All Rights Reserved.

---

**VERIFICATION**

---

I, Sharon Alvarado, Government Operations Manager Public Policy and Compliance, hereby state that I am authorized to execute this Verification on behalf of Broadwing Communications, LLC, that the foregoing filing was prepared under my direction and supervision, and that the facts set forth in that filing are true and correct to the best of my knowledge, information and belief.

11/14/2019  
Date

Sharon Alvarado  
Signature

---

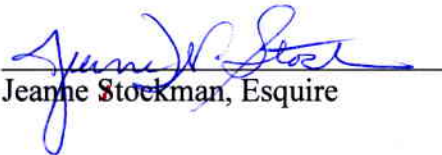
## CERTIFICATE OF SERVICE

---

I hereby certify that a copy of Broadwing Communications, LLC's Application to Abandon Certain Voice Services and Exit Plan was sent to the below parties on this November 14, 2019 by electronic mail, first-class, postage prepaid, or overnight mail.

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street N.W. Suite 800  
Washington, DC 20005  
[bwestbrook@psc.dc.gov](mailto:bwestbrook@psc.dc.gov)

Sandra Mattavous-Frye, Esquire  
People's Counsel  
Office of People's Counsel  
1133 15<sup>th</sup> Street, NW  
Suite 500  
Washington, DC 20005  
[smfrye@opc-dc.gov](mailto:smfrye@opc-dc.gov)

  
Jeanne Stockman, Esquire