

**REDACTED – FOR PUBLIC INSPECTION**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Technology Transitions	)	GN Docket No. 13-5
	)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition	)	GN Docket No. 12-353
	)	

**CENTURYLINK PROPOSAL FOR IP SERVICE TRIAL  
AND REQUEST FOR DECLARATORY RULING**

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**CENTURYLINK PROPOSAL FOR IP SERVICE TRIAL**

CenturyLink, Inc. (CenturyLink) hereby files this proposal for a service-based experiment, or trial, related to the ongoing transition from time-division multiplexed (TDM) to Internet Protocol (IP) services. CenturyLink requests expeditious approval so that it and its CLEC trial partners may begin implementing the proposed trial in support of this critical transition. As part of its proposal, CenturyLink also asks the Commission to confirm that CenturyLink’s participation in this trial will not in any way affect its preexisting regulatory obligations—or create any new ones—related to the exchange of voice traffic with other providers.

**I. INTRODUCTION AND SUMMARY.**

In the *Technology Transitions Order*, the Commission invited proposals for service-based experiments of diverse scope from various types of providers.<sup>1</sup> The Commission found that such experiments would serve several purposes. They would allow the Commission and the public to

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<sup>1</sup> *In the Matter of Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Order, 29 FCC Rcd 1433, 1433, ¶¶ 1, 30 (rel. Jan. 31, 2014) (*Technology Transitions Order*).

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evaluate how customers are affected by these historic technology transitions. They would speed market-driven transitions and innovations by preserving the core statutory values underlying the Communications Act (*i.e.*, public safety, ubiquitous and affordable access, competition, and consumer protection). And they would create “arenas of innovation” where trial participants can explore and resolve operational challenges that result from transitioning to new technology, free, “to the extent possible, from the necessity of calculating the rippling legal and policy ramifications of each new action.”<sup>2</sup> The Commission stressed the need to collect data permitting meaningful oversight and observation of the trials and to ensure an open and deliberative process to identify and address challenges that arise in the trials and the transition itself.<sup>3</sup> The ultimate objective of these trials is to “prepare for, maintain, and facilitate the momentum of technological advances that are already occurring.”<sup>4</sup>

Consistent with that vision, CenturyLink proposes a service trial in a geographical area in Las Vegas, Nevada roughly encompassing twelve wire centers (hereinafter referred to as the Trial Area), to explore the impacts of the TDM-to-IP transition on business end users *and* providers exchanging Voice over Internet Protocol (VoIP) traffic through commercially-negotiated (VoIP) connectivity utilizing Session Initiation Protocol (SIP).<sup>5</sup> CenturyLink will be

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<sup>2</sup> *Technology Transitions Order*, 29 FCC Rcd at 1442, ¶ 25.

<sup>3</sup> *Id.* at 1433 ¶ 1.

<sup>4</sup> *Id.* at 1442 ¶ 25.

<sup>5</sup> SIP is “an application level signaling protocol for setting up, modifying, and terminating real-time sessions between participants over an IP data network.” William Stallings, *The Session Initiation Protocol*, Cisco Internet Protocol Journal, Vol. 6, No. 1 (Mar. 2003), available at [http://www.cisco.com/web/about/ac123/ac147/archived\\_issues/ipj\\_6-1/sip.html](http://www.cisco.com/web/about/ac123/ac147/archived_issues/ipj_6-1/sip.html).

joined in this trial by two CLECs, Bandwidth.com, CLEC, LLC, and its affiliates (Bandwidth) and Inteliquent. The trial will enable these three providers to work through operational, technical, and logistical issues associated with the transition, generating valuable information for the Commission and other interested parties to ensure that the “enduring values” identified in the *Technology Transitions Order* continue to be fulfilled. Given its focus on business users and VoIP interconnection, CenturyLink’s proposed trial will provide a salient complement to AT&T’s pending consumer-centered trial,<sup>6</sup> and help facilitate this critical transition to next-generation IP networks and services.

CenturyLink need not convince the Commission of the importance of the IP transition. Indeed the Commission likens this transition to other landmark technological transformations such as the introduction of railroads and the telegraph.<sup>7</sup> And the IP transition is, of course, well underway. In just a few decades, IP technology has extended into nearly every aspect of daily life, creating new industries and dramatically altering others along the way. With new IP-based services introduced each day, the IP ecosystem continually yields once-inconceivable benefits for American consumers.

Yet, as the Commission recognizes, while such technology transitions are positive, they also can be disruptive, both in terms of unsettling customer expectations and threatening

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<sup>6</sup> See AT&T Proposal for Wire Center Trials, GN Docket Nos. 13-5, 12-353 (filed Feb. 27, 2014). See also Application of Iowa Network Services, Inc. for Authority to Conduct a Service-Based Experiment Concerning The TDM-to-IP Transition for Centralized Equal Access Service, GN Docket Nos. 13-5, 12-353 (filed Feb. 20, 2014), and notice of withdrawal (filed May 15, 2014).

<sup>7</sup> *Technology Transitions Order*, 29 FCC Rcd at 1437-1438 ¶¶ 10-11.

established business models. Indeed, the IP transition presents both significant opportunities and challenges for the telecommunications industry, and particularly for incumbent LECs such as CenturyLink. In order to stay competitive, CenturyLink has invested heavily in its broadband network, while expanding its suite of IP-based service offerings and diversifying into cloud computing and managed services. CenturyLink also recently announced the expansion of its gigabit service to sixteen cities, with broadband speeds of up to one gigabit per second soon available to thousands of residential and business customers,<sup>8</sup> and it has steadily expanded the reach of its Prism TV video offering.<sup>9</sup> CenturyLink also offers SIP Trunk and Hosted VoIP services through its non-ILEC affiliate, CenturyLink Communications, LLC, as replacements to its TDM business telephone line and Centrex offerings, in competition with cable, CLEC and wireless competitors.

At the same time, CenturyLink has deep roots in legacy phone services, especially in rural America, and still maintains a TDM network tying together thousands of communities, large and small, in 37 states—a network that every day becomes increasingly underutilized and obsolete. Since 2000, ILECs such as CenturyLink have lost more than half their access lines, as consumers have abandoned ILEC phone lines for cable, wireless, CLEC and Internet-based

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<sup>8</sup> CenturyLink News Release, available at <http://news.centurylink.com/news/centurylink-expands-its-gigabit-service-to-16-cities-delivering-broadband-speeds-up-to-1-gigabit-per-second> (Aug. 5, 2014).

<sup>9</sup> *CenturyLink Expands Prism Pay-TV Service to Douglas County Cities*, Denver Post, available at [http://www.denverpost.com/business/ci\\_26630077/centurylink-expands-prism-pay-tv-service-douglas-county](http://www.denverpost.com/business/ci_26630077/centurylink-expands-prism-pay-tv-service-douglas-county) (Sept. 29, 2014).

alternatives.<sup>10</sup> Indeed, by 2012, 92 percent of U.S. households were in Zip Codes with ten or more non-ILEC interconnected VoIP providers,<sup>11</sup> and, today, 41 percent of U.S. households are wireless-only.<sup>12</sup> It therefore should be no surprise that CenturyLink serves less than 30 percent of the households passed by its TDM network.

Despite these trends, CenturyLink still has to maintain 100 percent of its TDM network—an increasingly difficult task. All too often, the network equipment that powers legacy TDM networks has reached the end of its service life and increasingly is no longer supported by its manufacturers, as they understandably turn their attention to growing IP markets. When such equipment breaks—at times miles from the nearest town—CenturyLink technicians are forced to scavenge spare parts from decommissioned assets in the network or try to track them down through after-market sources. As Chairman Wheeler has noted, “[d]ue in part to outdated rules, the majority of the capital investments made by U.S. telephone companies from 2006 to 2011

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<sup>10</sup> Compare *Local Telephone Competition: Status as of June 30, 2009*, Industry Analysis and Technology Division, Wireline Competition Bureau, at 12, Table 1 (rel. Sept. 2010) (“*2009 Local Telephone Competition Report*”), available at <https://prodnet.www.neca.org/publicationsdocs/wwpdf/9310fccreport.pdf> with

*Local Telephone Competition: Status as of June 30, 2013*, Industry Analysis and Technology Division, Wireline Competition Bureau at 12, Table 1 (rel. June 2014) (“*Mid-2013 Local Telephone Competition Report*”), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-327830A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-327830A1.pdf).

<sup>11</sup> FCC Wireline Competition Bureau, *Local Telephone Competition: Status as of December 31, 2012*, at 33, Table 20, available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-324413A1.doc](https://apps.fcc.gov/edocs_public/attachmatch/DOC-324413A1.doc).

<sup>12</sup> Stephen J. Blumberg, Ph.D., and Julian V. Luke Division of Health Interview Statistics, National Center for Health Statistics, *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, July–December 2013* (2013), available at <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201407.pdf>.

went toward maintaining the declining telephone network, despite the fact that only one-third of U.S. households use it at all.”<sup>13</sup> Thus, many areas served by CenturyLink have reached, or rapidly approach, the “tipping point” predicted by the Commission, where a critical mass of customers have transitioned away from legacy TDM services, generally to providers other than CenturyLink, making the continuing provision of those legacy services impractical and inefficient.<sup>14</sup>

Faced with these realities, CenturyLink has been developing plans to gradually transition its TDM networks and services to IP. With more than 4,000 central offices, and the estimated cost in the billions, this transition will likely stretch over a decade or longer. As CenturyLink has discussed in previous filings, each provider will transition to IP at a different pace, depending on the nature of its legacy network and the services it offers. Given the vast rural areas served by CenturyLink, its transition will likely progress at a slower rate than for a provider serving predominately urban and suburban areas.

As this transition progresses and CenturyLink reaches a critical mass of VoIP customers in a geographic area, it will make sense to begin exchanging voice traffic with other providers through VoIP connectivity, rather than existing TDM interconnection arrangements. As part of

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<sup>13</sup> Prepared Remarks of FCC Chairman Tom Wheeler, Silicon Flatirons, University of Colorado Law School, Boulder, Colorado (Feb. 10, 2014), available at <http://www.fcc.gov/document/fcc-chairman-tom-wheeler-remarks-silicon-flatirons>. See also Anna-Maria Kovacs, *Telecommunications Competition: The Infrastructure-Investment Race*, at 9-11 (Oct. 8, 2013), available at [http://internetinnovation.org/images/misc\\_content/study-telecommunications-competition-09072013.pdf](http://internetinnovation.org/images/misc_content/study-telecommunications-competition-09072013.pdf) (noting that ILECs’ legacy customers must now support networks originally scaled for roughly three times as many access lines).

<sup>14</sup> See *Technology Transitions Order*, 29 FCC Rcd at 1436 ¶ 3.

its planning process, CenturyLink has explored various interconnection models that could be used for this purpose, ranging from a Point of Connection (POC)-per-LATA approach similar to that generally used for TDM interconnection today to the regional approach already utilized in peering arrangements for exchanging IP data traffic. As it has shared with the Commission, CenturyLink has concluded that a state-based model, employing one POC per state for the exchange of VoIP traffic, provides the best balance of efficiency and redundancy, to the benefit of consumers, PSAPs, and IP service providers.<sup>15</sup> Under this model, CenturyLink’s non-ILEC subsidiary, CenturyLink Communications, LLC, will use its extensive national network to link these connectivity points and exchange traffic with other providers.

With this plan in mind, CenturyLink now proposes a trial exploring the TDM-to-IP transition from the perspectives of both a business end user replacing its traditional telephone services with VoIP services and a CLEC that will use commercially-negotiated VoIP connectivity arrangements to exchange VoIP traffic in SIP protocol that originates and terminates in IP format. Consistent with the Commission’s intent, the trial will thus test a “real-world” application examining “the impacts of replacing existing customer services with IP-based alternatives in discrete geographic areas or ways.”<sup>16</sup> The trial will also provide an opportunity for the Commission, the providers participating in the trial and other interested parties to observe key aspects of the trial to ensure that “enduring values” are sufficiently preserved in this transition, subject to the safeguards articulated in the *Technology Transitions Order*. Indeed, this

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<sup>15</sup> See Letter from John E. Benedict, CenturyLink, to Marlene H. Dortch, FCC, GN Docket No. 13-5 (dated Aug. 16, 2013).

<sup>16</sup> *Technology Transitions Order*, 29 FCC Rcd at 1436 ¶ 5.

is an ideal time to conduct such a trial, as the associated IP-based technologies are well-proven, yet TDM-based services still remain as a backstop, allowing customers to return to legacy services in the event of any perceived problem.

In the attached Operating Plan, CenturyLink provides a detailed plan for its proposed trial, which it projects to last approximately six months from the date it is approved. As noted, the trial includes two components. In the first component, CenturyLink will use existing marketing channels to recruit business customers to voluntarily participate in the trial, with the opportunity to report on their experiences in transitioning from TDM to IP voice services, while CenturyLink collects other more objective measures of the IP-based services provided and identifies opportunities for improvement.

In the second component, CenturyLink's CLEC affiliate will exchange voice traffic that originates and terminates in Nevada in IP format with two CLECs, Bandwidth and Inteliquent, over commercially-negotiated IP interconnection arrangements—something that CenturyLink has not done to date with respect to local voice traffic. During the trial, CenturyLink will work closely with the CLECs to identify any technical, operational and logistic difficulties and work through them collaboratively. The CLECs will also have a chance to share their experiences with the Commission, as CenturyLink collects meaningful data regarding the commercially-negotiated VoIP connectivity arrangements used in the trial.

The Plan provides detailed information on both components of the proposed trial. In particular, it identifies and describes the geographic area in which the trial will be conducted, the network architecture that will be used to exchange end-to-end VoIP traffic between CenturyLink

and the participating CLECs, the VoIP services that will be provided to participating business customers, and the methods CenturyLink intends to use to attract business customers to participate in the trial. The Plan also details how CenturyLink proposes to meet the Commission's requirement that trials meet the "enduring values" identified in the *Technology Transitions Order*, as well as the data that will be collected.

As noted, the trial is very narrow in scope. It is essentially an overlay that will have no effect on retail or wholesale customers not participating in the trial, except that any CenturyLink VoIP customer in the trial area who calls or receives a call from a Bandwidth or Inteligent VoIP customer in Nevada will have that call carried over the trial architecture. CenturyLink also is not seeking to discontinue any services, nor is it requesting a waiver of any Commission rules, even for purposes of the trial. For those participating in the trial, CenturyLink will take the steps identified in the Plan to ensure that the various enduring principles are met, including public safety, universal access, competition, and consumer protection. Because it is an overlay trial, CenturyLink does not believe that any federal, state or local authorizations or approvals are necessary to conduct the trial, beyond the Commission's approval of this proposal and the request for declaratory ruling discussed in Section II below.

CenturyLink believes that the trial will present a valuable complement to the one other pending trial proposal submitted by AT&T. There, AT&T proposed to discontinue certain TDM-based services provided to consumers in two wire centers in Alabama and Florida and replace them with a combination of wireline and wireless IP-based voice services. In contrast, CenturyLink's trial focuses on business customers and the exchange of VoIP traffic originating

and terminating in Nevada between CenturyLink and two CLEC participants. In addition, CenturyLink is a substantially different company than AT&T, in terms of its size, scope and lack of a wireless affiliate.

CenturyLink will conduct an open, transparent trial. It has already notified state and local government officials in Nevada. During the experiment, CenturyLink will collect critical operational, technical, and customer experience information, both relating to the participating business VoIP customers and the traffic handoffs between CenturyLink and the participating CLECs. The collected information will be reported to the Commission and made available to interested parties. That information will also help guide CenturyLink's business decisions regarding the TDM-to-IP transition.

## **II. REQUEST FOR DECLARATORY RULING.**

Pursuant to Section 1.2 of the Commission's rules,<sup>17</sup> CenturyLink asks the Commission to clarify that CenturyLink's participation in this trial will not in any way affect its preexisting regulatory obligations—or create any new ones—related to the exchange of voice traffic with other providers. In particular, the Commission should clarify that CenturyLink's exchange of local voice traffic in IP format with Bandwidth and Inteliquent in this narrowly circumscribed trial would not create an obligation for CenturyLink to enter into similar arrangements with other providers, either within or outside this trial, or impact any obligation CenturyLink has to negotiate in good faith in response to requests for IP-to-IP interconnection for the exchange of

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<sup>17</sup> 47 C.F.R. § 1.2.

voice traffic.<sup>18</sup> CenturyLink’s participation in this trial is contingent on the Commission granting this requested clarification.

This clarification naturally follows from the Commission’s finding in the *Technology Transitions Order* that, by exchanging VoIP traffic in a service trial without converting that traffic to TDM, “that provider shall not be deemed to have conceded – nor will the Commission have determined – that VoIP traffic is subject to interconnection obligations.”<sup>19</sup> The requested clarification is also important. CenturyLink believes that the proposed trial will yield valuable insights regarding the technical, operational, and logistical issues associated with VoIP-to-VoIP connectivity, thus expediting its deployment of such commercial arrangements when sufficient numbers of its voice customers have migrated to VoIP. But for this trial, however, CenturyLink would not, at this time, be offering to exchange any type of local voice traffic in IP format. That is because virtually all CenturyLink’s residential voice customers are still served via TDM services, and the vast majority of its business customers are as well. It is thus premature for CenturyLink to exchange local voice traffic in SIP format outside of the context of a trial. CenturyLink is able to do so in the proposed trial only because the trial is of manageable scale and scope, by being limited to two exchanging providers, a single state, and a relatively small amount of voice traffic that is already in IP format on an end-to-end basis.

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<sup>18</sup> See, e.g., *Connect America Fund, et al.*, WC Docket No. 10-90, et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd at 17678, ¶ 42 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*), (stating an expectation that “all carriers [will] negotiate in good faith in response to requests for IP-to-IP interconnection for the exchange of voice traffic”), *subsequent history omitted*.

<sup>19</sup> *Technology Transitions Order*, 29 FCC Rcd at 1442 ¶ 25.

### **III. TRIAL OBJECTIVES.**

CenturyLink's proposed trial has two primary objectives.

*First*, the trial will explore the TDM-to-IP transition from the perspective of a business user. It will generate valuable information for the Commission, participating providers, and other interested parties on the operational and consumer-experience aspects of business customers' transition to VoIP, including feedback on all aspects of the transition from business customers involved in the trial. Any lessons learned during the trial will help facilitate the transition for future customers, as it accelerates and TDM networks eventually begin to be decommissioned.

*Second*, the trial will examine the use of a commercially-negotiated VoIP-to-VoIP connectivity arrangement to exchange voice traffic in IP format that originates and terminates in Nevada. This aspect of the trial will provide technical and operational experience for CenturyLink and the CLEC participants, while giving them a vehicle for identifying and resolving any operational, technical or logistical issues that arise. Ultimately, this will aid CenturyLink in designing future VoIP connectivity arrangements with other CLECs, as its state-level IP connectivity model is deployed, enabling providers to exchange IP voice traffic at one POC per state.

### **IV. TRIAL LOCATIONS AND SCOPE.**

CenturyLink is proposing to conduct the trial in Las Vegas, Nevada—in an area of roughly 680 square miles. As described above, CenturyLink's trial is limited to business customers and business VoIP services. What makes Las Vegas an ideal location for this trial are its scale and

scope as a highly dense major metropolitan area, the presence of a large number of potential candidate business VoIP services customers, and the existence, via CenturyLink's non-ILEC affiliate, CenturyLink Communications, LLC, of an already-in-place CenturyLink CLEC IP network capability. Both of the CLEC partners in this trial also have network infrastructure and a customer base in Las Vegas. There are approximately 105,389 businesses in the Las Vegas market. And, CenturyLink holds **\*BEGIN HIGHLY CONFIDENTIAL** **END HIGHLY CONFIDENTIAL\*** of the VoIP-enabled business market in Las Vegas. CenturyLink calculates that there is also available growth of an additional **\*BEGIN HIGHLY CONFIDENTIAL** **END HIGHLY CONFIDENTIAL\*** customers among VoIP-enabled businesses. At the same time, as noted above, the trial is targeted to existing Las Vegas CenturyLink business customers. And, a subset of the Las Vegas market (roughly equivalent to the area served by 6 of the 12 Las Vegas CenturyLink wire centers) is the source of **\*BEGIN HIGHLY CONFIDENTIAL** **END HIGHLY CONFIDENTIAL\*** of CenturyLink's total Las Vegas business revenue. Thus, the trial is expected to focus primarily in that area.

#### **V. SERVICES INCLUDED IN THE TRIAL.**

As noted, CenturyLink's proposed trial will explore the TDM-to-IP transition from the perspectives of both business users and interconnecting providers. Participating business users in the Trial Area will transition from CenturyLink TDM-based services, such as business lines and Centrex, to CenturyLink's SIP trunk and Hosted VoIP services, respectively.<sup>20</sup> These VoIP

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<sup>20</sup> CenturyLink is in the process of upgrading its legacy SIP Trunk product to iQ SIP Trunk, which will be provided over an upgraded platform with enhanced capabilities and features. CenturyLink recently filed a request for authority to cease offering the legacy SIP Trunk product

services provide many features not available with the TDM-based services they are replacing, including integrated voice and data services and enhanced security and reliability. Detailed descriptions of these services are included in the attached Operating Plan. These CenturyLink VoIP services will support the vast majority of the devices and applications listed in Appendix B of the *Technical Transitions Order*. The Applications and Device Compatibility Chart included in the attached Operating Plan identifies whether particular applications or devices currently supported over TDM are supported over the CenturyLink VoIP services featured in the proposed trial. For some applications or services that are not currently supported, industry work is underway to support them in the future. The Operating Plan provides further information on that subject as well.

With regard to interconnecting providers, CenturyLink and the CLEC participants will transition from their current TDM-based Section 251 interconnection arrangements to commercially-negotiated VoIP connectivity arrangements, for the narrow segment of traffic calls covered by the trial. Specifically, these arrangements would be used to exchange such traffic between CenturyLink's VoIP customers and Bandwidth's and Inteliquent's VoIP customers. These IP arrangements will employ CenturyLink's state-level IP connectivity model, by which exchanging service providers will interconnect via one POC in each state. CenturyLink is currently negotiating IP Connectivity and Traffic Exchange Trial Agreements with Bandwidth

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to new customers. *See In the Matter of Section 63.71 Application of CenturyLink For Authority to Cease Providing Legacy SIP Trunk VoIP Service to New Customers*, Section 63.71 Application (filed Oct. 31, 2014).

and Inteliquent. More detail on these connectivity arrangements is provided in Section 4 of the attached Operating Plan.

## **VI. PROTECTING ENDURING VALUES.**

### *PROTECTING PUBLIC SAFETY AND NATIONAL SECURITY*

CenturyLink shares the Commission's commitment to public safety and national security. As detailed in its Operating Plan, CenturyLink will take all steps necessary to ensure that the existing levels of public safety and national security on its network are maintained during the proposed trial and the ultimate transition to IP networks and services.

### *MAINTAINING UNIVERSAL ACCESS*

CenturyLink will, in this trial, also maintain and, indeed, enhance the Commission's principles of universal access consistent with the principles outlined in the *Technology Transitions Order*.

### *COMPETITION*

CenturyLink's proposed trial also meshes squarely with the competition principles articulated in the *Technology Transitions Order*. As detailed above, one of the primary purposes of the trial is to enable CenturyLink's CLEC and the two CLEC entities to experiment with the exchange of VoIP-to-VoIP calls originating and terminating in the state of Nevada over commercially-negotiated VoIP connectivity arrangements. This will be done on a limited basis without impacting existing wholesale TDM access arrangements currently in place for non-VoIP traffic. Consistent with the *Technology Transitions Order*, participation is entirely voluntary – for both potential trial business VoIP customers and for participating CLECs. And, consistent

with the *Order*, CenturyLink is not seeking to resolve through this application or in this proposed trial any of the myriad and complex legal and policy questions implicated by the IP transition. For example, it does not seek to resolve issues concerning the extent to which wholesale obligations associated with an ILEC's provision of TDM-based services, such as the required unbundling of high capacity loops or the resale of telecommunications services, apply to IP-based services, including those provided by the ILEC's CLEC affiliate. In fact, one of the strengths of the trial is that it represents an effort by potential adversaries on these and other complicated issues such as intercarrier compensation to put aside their disagreements and simply experiment with limited aspects of the technical challenges entailed. CenturyLink describes in its Operating Plan its plans for addressing the other specific conditions and presumptions established in the *Technology Transitions Order*.

*PRIVACY AND OTHER CONSUMER PROTECTION VALUES*

CenturyLink will conduct all aspects of the trial consistent with the Centurylink privacy policy, which applies to CenturyLink's legacy TDM services, as well as IP-based services. In addition, Centurylink will continue to comply with applicable privacy laws and regulations, including those concerning customer proprietary network information (CPNI). CenturyLink has established operating procedures that are adequate to ensure compliance with the rules. Accordingly, pursuant to the Commission's 2007 Order extending the CPNI regulations to interconnected VoIP providers, the CenturyLink business units and entities that provide interconnected VoIP services—including the affiliate that will provide the trial services, CenturyLink Communications, LLC—apply these processes and procedures today to safeguard

the CPNI of CenturyLink's interconnected VoIP customers. CenturyLink's Operating Plan also details how CenturyLink will attend to the other consumer protection concerns outlined by the Commission in the *Technology Transitions Order*.

## **VII. CONCLUSION.**

CenturyLink outlines herein its proposal for a service trial exploring the TDM-to-IP transition from the perspectives of both business users and providers exchanging VoIP-to-VoIP traffic. CenturyLink urges the Commission to approve this proposal, and the associated request for declaratory ruling, expeditiously so CenturyLink may begin to implement the trial, working through associated operational, technical and logistical issues with its CLEC trial partners, and share resulting insights with the Commission and interested parties.

Respectfully submitted,

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