

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Application of

Qwest Corporation d/b/a CenturyLink QC

For Authority to Discontinue an Open  
Network Architecture Basic Service Element

WC Docket No. 18-96

**COMMENTS OF GLOBAL GRID TELECOM, INC.**

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May 28, 2018

Global Grid Telecom, Inc. (“GGT”) is a Competitive Local Exchange Carrier (“CLEC”) and Enhanced Service Provider Exchange Carrier (“CLEC”) and Enhanced Service Provider (“ESP”) with headquarters in the state of Oregon and provides enhanced calling services on the Qwest Corporation d/b/a CenturyLink QC’s local exchange network throughout the Qwest 14-state territory. Currently, GGT has several contracts with CL dating back to 2003 which permits GGT to resell CL services, purchase (wholesale) network access and services, and subscribe to Call Event and Management Signaling Service (CEMSS) on CL contracted DS1 and DS3 dedicated channels, and other Basic Service Elements under the Open Network Architecture (“ONA”) regime.<sup>1</sup>

GGT provides a vast array of consumer, small business, and enterprise voice management services and security offerings which depend exclusively upon the CEMSS Advanced Intelligent Platform (“AIN”) and certain “triggers” that are initiated upon the placement or receipt of a telephone call where the telephone subscriber has requested the CEMSS feature be provisioned. The capability of provisioning the CEMSS feature on any of CL’s 2,841,430 business and residential lines served by the 505 Lucent 5E and Northern Telecom DMS central offices<sup>2</sup> allows GGT as well as other Enhanced Service Providers and CLEC’s access to the same network control protocols as CL’s enhanced services marketed as Call Blocking, No Solicitation, Call Rejection, and Remote Access Call Forwarding.

By discontinuing the CEMSS offering, CL effectively eliminates all competition in the marketplace for call management services AND thwarts ESPs and further development of communications innovations as mandated by the FCC.<sup>3</sup> Allowing CL to discontinue CEMSS stifles competition and leaves the marketplace with only one provider for CL customers and that is CenturyLink.

Without unfettered access to CL’s Telcordia CvAS (CEMSS) platform and the Parlay

and C.O.R.B.A. interfaces through DS1 and DS3 connectivity, Global Grid Telecom will not have the same access to the end user's telephone line and will be unable to provide any of its MAX|command call management services

In its Application for Authority to Discontinue the CEMSS Basic Service Element, CL states in paragraph 5 that it does not currently have any customers subscribing to CEMSS. This may be the case but were it not for a billing dispute between CL and GGT, GGT would be a customer currently as we were from August 2009 through February 2013.

CL provided, under contract, to GGT the requisite DS1 and CEMSS services that permitted GGT to provide its MAX|command Call Blocking and 511 Code Services. CEMSS services were provisioned by CL on their network and our shared customer's lines from their two Network Control Points, Dry Creek, Co and Mesa, AZ. Repeated requests (to the product manager at the time, Ms. Maureen Callan) for timely billing of the monthly fees went unfulfilled for 3-years. Upon the replacement of Ms. Callan by CL with Mr. Brett Bode, a 3-year bill was rendered and GGT was given 30-days to pay. When GGT was unable to pay the bill in full the CEMSS services were disconnected. GGT argues that GGT has standing in this matter and further argues that CL used this gambit to impede GGT's ability to continue providing competing Call Management Services.

We concur with the FCC that fostering a competitive environment in which telecommunications companies can develop and deploy next-generation products and services on the Incumbent Carrier's Local Exchange Network ultimately serves the end user, supports law enforcement, public safety, and national security<sup>3</sup>. Requiring CL to preserve the CEMSS service also serves as a platform for developing and enhancing the national telecommunications network and thusly serves end users and the public at large.

The Commission should deny CenturyLink's Application for Authority to Discontinue

the CEMSS Open Network Architecture Basic Service Element.

If the Commission nonetheless decides to approve CL's application and no other means of access to the above-mentioned capability to monitor and control the end user's telephone line through the AIN technology is afforded to ESPs and CLECs, then suitable network controls and access should be required by the FCC that would allow ESP's and CLEC's to develop and deploy current and future Call Management solutions using the Advanced Intelligent Network infrastructure.

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<sup>1</sup> The FCC's Open Network Architecture: [http://www.wisetel.com.br/pe\\_t-security/biblioteca/referencias\\_estrangeras/nist\\_800\\_11/The%20FCC's%20Open%20Network%20Architecture.htm](http://www.wisetel.com.br/pe_t-security/biblioteca/referencias_estrangeras/nist_800_11/The%20FCC's%20Open%20Network%20Architecture.htm) ONA is the overall design of a carrier's basic network facilities and services to permit all users of the basic network, including the *enhanced service operations of the carrier and its competitors*, to interconnect to specific basic network functions and interfaces on an unbundled and equal access basis. CenturyLink currently offers CEMSS in its legacy Qwest ILEC footprint via CenturyLink FCC Tariff No. 11 as a Basic Service Element.

<sup>2</sup> Source: CenturyLink's public facing website and ICONN Database  
<http://qc.centurylink.com/cgi-bin/iconn/dlc.cgi>

<sup>3</sup> <https://www.fcc.gov/general/strategic-plan-fcc>

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Respectfully submitted,

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