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Associate General Counsel

Via ECFS

July 2, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket No. 19-171, *Section 63.71 Application of TelCove Operations, LLC For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue the Provision of Certain Voice and Data Services in the Tallahassee, Florida Metropolitan Area*

Dear Ms. Dortch:

CenturyLink submits this letter to amend the Section 63.71 application of TelCove Operations, LLC filed on May 24, 2019 in the above-referenced docket. Specifically, CenturyLink amends the above-referenced application to add a service (*i.e.*, Basic Rate Interface) to the list of services affected.

CenturyLink is filing an amended version of the application for the Commission's convenience. No changes were necessary to the customer notice letter, as the additional service was included in that notice. Please contact me if you have any questions.

Sincerely,

/s/ Craig J. Brown

Enclosure

cc: Kimberly Jackson, FCC (via email)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
Section 63.71 Application of)	
)	
TelCove Operations, LLC)	WC Docket No. WC 19-171
)	
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934, as)	
amended, to Discontinue the Provision of)	
Certain Voice and Data Services in the)	
Tallahassee, Florida Metropolitan Area))	

**SECTION 63.71 APPLICATION OF
TELCOVE OPERATIONS, LLC (AS AMENDED)**

TelCove Operations, LLC (FRN: 0003-7091-10) ¹, a CenturyLink company, seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, to discontinue certain Voice and Data services in the Tallahassee, Florida metropolitan area.

CenturyLink provides the following information pursuant to Section 63.71 of the Commission's Rules:

1. Name and Address of the Carrier

TelCove Operations, LLC
100 CenturyLink Drive
Monroe, LA 71203

¹ TelCove Operations, LLC is a subsidiary of CenturyLink, Inc. (FRN 0018-6268-53).

2. Date of Planned Service Discontinuance

CenturyLink plans to discontinue the affected services to the ten customers covered by this application on or around September 30, 2019 or as soon thereafter as any necessary regulatory approvals are obtained.

3. Points of Geographic Areas of Service Affected

CenturyLink proposes to discontinue the affected services in the Tallahassee, Florida metropolitan area.

4. Description of Services Affected

Voice and Data Services: POTs, Analog and Digital T1 services provide voice-grade telephonic communications channels that can be used to place or receive one call at a time; PRI allows a connection between ISDN customer premises equipment and CenturyLink's switching equipment using a Primary Rate Interface over a digital transport facility; Basic Rate Interface allows a connection between ISDN customer premises equipment and CenturyLink's switching equipment for two bearer channels and one data channel; Centrex service is a multistation system that consists of digital switching equipment in the Applicant's switch connected to station lines on the customer premises, enabling customers to originate and receive local calls; Remote Call Forwarding (RCF) allows a customer the ability to have calls forwarded on a permanent basis to a designated telephone number; Toll-Free (TF) service allows call charges to be billed to the customer and not to the party originating the call.

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 by United Parcel Service or U.S. Mail on May 22, 2019. A copy of the notification is attached to this application (Attachment A).

6. Whether the Carrier is Considered Dominant or Non-dominant with Respect to the Service to be Discontinued

CenturyLink is considered non-dominant with respect to the services to be discontinued.

7. Other Information

In accordance with Section 63.71(a) of the Commission's Rules, a copy of this application is being mailed concurrently with its filing to the entities listed on the attached certificate of service.

CONCLUSION

The public convenience and necessity will not be adversely affected by the discontinuance of the services described herein. Advance notice has been provided to all affected customers, giving them ample time to arrange substitute services, which are readily

available and include, but are not limited to, other services offered by other CenturyLink affiliates. Therefore, CenturyLink respectfully requests that the Commission approve this Section 63.71 application.²

Respectfully submitted,

TELCOVE OPERATIONS, LLC

By: *Craig J. Brown*
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Washington, DC 20001
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Craig.J.Brown@CenturyLink.com

Its Attorney

July 2, 2019

² This Application does not fall within the scope of 47 C.F.R. § 63.71(a)(6).



100 CenturyLink Drive
Monroe, LA 71203

May 21, 2019

<<Customer Name>>

<<Address>>

<<Address>>

RE: **NOTICE: Regulatory Notice of Termination / Service Disconnection – TelCove Operations, LLC**

Billing Account Number: << _____ >>

Dear <<Customer Name>>

TelCove Operations, LLC ("TelCove"), a CenturyLink company, is writing to provide notice that TelCove is discontinuing the provision of certain **Voice and Data Services** in the **Tallahassee** metropolitan area, subject to the approval of the Federal Communications Commission ("FCC") on or after **September 30th, 2019** (the "Termination Date"). These Services are provided to you under service terms between <<Customer Name>> and **TelCove**.

You are receiving this notice because you currently subscribe to one or more of the following services, which, subject to the approval of the FCC, will be discontinued as a result of the planned decommission of certain Level 3 voice switches.

- Analog or Digital T1 - provides voice-grade telephonic communications channels that can be used to place or receive one call at a time based on Analog or Digital signal
- Primary Rate interface (PRI) – Integrated Services Digital Network (ISDN) for carrying multiple DS0 voice and data transmissions between the network and a user.
- Basic Rate Interface (BRI) - two B channels and one D channel
- Plain Old Telephone service (POTS) - voice-grade telephone service employing analog signal transmission over copper loops
- Centrex - POTS lines with the feature packages of PBXs (features such as 4 digit dialing, call pick up, call hold, etc.)
- Remote Call Forwarding - a service feature that allows calls coming to a remote call forwarding number to be automatically forwarded to any answering location designated by the call receiver.
- Toll Free - telephone number that is billed for all arriving calls instead of incurring charges to the originating built to specific numbers to forward to

In order to maintain continuous service at your location following the proposed discontinuance, CenturyLink would like to work with you to migrate your existing service to our next-generation, state-of-the-art platform that will provide your business with greater flexibility, simplicity, and efficiency. Please contact me as soon as possible to ensure a seamless and uninterrupted transition of your voice service.

If you have not made arrangements with CenturyLink or another telecommunications service provider to replace your voice service listed above prior to **September 30th, 2019**, please be advised that your service will be disconnected on or after **September 30th, 2019** provided that the FCC approves the planned discontinuance. However, you must contact your account team or submit a disconnect order to billing for the disconnected service. If your services are deemed unnecessary, please contact your account team or <<Customer Name>> can submit a disconnect order through the customer disconnect portal by Billing account number for the disconnection of your service.

ATTACHMENT A



We understand that this is an inconvenience, and we are confident that our team can seamlessly manage the entire process to provide your business with a better communications solution.

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

We would like to work with you immediately to update your service and continue our valued relationship, so please contact me as soon as possible to discuss our migration plan.

The CenturyLink point of contact for this transition will be your CenturyLink Account Manager. Your Account Manager is <<Account Manager Name>> and can be reached at <<AM Phone>>, or by email at <<AM Email Address>>. If you would like to designate an operational contact with respect to this matter, please provide his or her contact information as soon as possible.

If there are any questions or concerns with respect to this letter, please feel free to contact your Account Manager. Again, Disconnects can be issued by <<Customer Name>> through the customer disconnect portal by Billing account number.

We require and appreciate your prompt attention to this matter. Thank you very much in advance for your cooperation.

Sincerely,

On behalf of CenturyLink and its affiliated companies

TelCove Operations, LLC is required by the FCC to provide the following statement:

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 TelCove Operations, 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>>

Affected Services:

<<List>>

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing **SECTION 63.71 APPLICATION OF TELCOVE OPERATIONS, LLC (AS AMENDED)** 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 Governor of the State listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commission listed on the attached service list;
- 4) Served via email on the Regulatory Authority for the Tribal Nation 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

July 2, 2019

Ron DeSantis
Office of Governor
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Secretary of Defense
Attn. Special Assistant for Telecommunications
Pentagon
Washington, DC 20301

Seminole Tribe of Florida (Big Cypress and
Brighton Reservations)
Chairman@seminoletribe.com