

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of CenturyLink, Inc.)	WC Docket No. 14-169
f/k/a CenturyTel, Inc. for Authority Pursuant to)	Comp. Pol. File No. 1169
Section 214 of the Communications Act of)	
1934, as Amended to Discontinue the)	
Provision of Telecommunications)	
Services)	

COMMENTS OF MH TELECOM

MH Telecom hereby comments on the request for discontinuation of ATM service filed by CenturyLink, Inc. f/k/a CenturyTel, Inc. (“CenturyLink”). Since 2001 MH Telecom has been purchasing DSL transport on a wholesale basis from CenturyLink in southwestern Wisconsin to provide Internet service to area end users. MH Telecom has a small yet loyal customer base in the CenturyLink service area as a result of offering dial-up Internet in this area dating back to the mid-1990.¹

On October 29, 2014, CenturyLink notified MH Telecom by email of their intention to discontinue service on December 15, 2014 (see attached notice and subsequent email correspondence). Contrary to what was stated in the Public Notice dated October 31, 2014, MH Telecom was not notified on February 5, 2014 or on August 18, 2014 of CenturyLink’s intention to discontinue service. In fact CenturyLink contacted MH Telecom during the summer of 2014 asking if MH Telecom would be interested in an Ethernet connection instead of the ATM connection and MH Telecom confirmed it would be interested in an Ethernet connection.

¹ Comments included on Application of CenturyLink, Inc. f/k/a CenturyTel, Inc., Public Notice, WC Docket No. 14-169, Comp. Pol. File No. 1169, DA 14-1590 (rel. October 31, 2014) (“Public Notice”).

In light of the short notice, MH Telecom requested a March 1, 2015, extension from CenturyLink to allow the end user customers time to evaluate their options and to allow for a smooth transition for those customers with more complex networks (i.e., static IP, domains, etc.). That request was rejected and CenturyLink is holding to their original date of December 15, 2014. That date is not even consistent with the December 31, 2014 discontinuation of service date stated in the Public Notice.

MH Telecom has no options or other method to provide service to its customers in the CenturyLink area. In fact, in some of the CenturyLink areas, there is no other facilities-based option other than CenturyLink for the end user customers, as CenturyLink is the incumbent local exchange carrier and cable company. Per the Public Notice it states that:

The Commission normally will authorize proposed discontinuances of service unless it is shown that customers or other end users would be unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity would be otherwise adversely affected.²

MH Telecom would like to continue providing service to its customers in the CenturyLink area, and it is technically capable, as is CenturyLink, to provision that service over ethernet.

MH Telecom is requesting the Commission rule at a minimum that CenturyLink extend the discontinuation of service to March 1, 2015 to allow a fair and proper time for end user customers an opportunity to evaluate their provider options and implement a smooth transition to a new service provider. Ideally the Commission would rule that CenturyLink is required to connect with MH Telecom via an ethernet connection at a fair wholesale rate, as technical connectivity should be customer agnostic.

² *Id.* at 2.

MH Telecom is requesting the Commission act expeditiously in light of the very short time we have to communicate this information with the end user customer.

Sincerely,

/s/ John Dunbar

John Dunbar
Assistant General Manager
MH Telecom, LLC
200 E Main Street
Mt. Horeb, WI 53572

Date: November 13, 2014

Attachment 1

From: Albritton, Trey E <Trey.Albritton@centurylink.com>
Sent: Wednesday, October 29, 2014 2:18 PM
To: John J. Dunbar
Subject: Ethernet Conversion

Follow Up Flag: Follow up
Due By: Thursday, October 30, 2014 5:00 PM
Flag Status: Flagged

Mr. Dunbar:

Recently, CenturyLink made modifications to our network in the state Wisconsin converting our ATM to Ethernet. The Platteville market area being served by MHTC ISP through purchasing ATM service and wholesale DSL from CenturyLink will be affected by this change. CenturyLink does not have an Ethernet product for Wholesale ISP purchase. Therefore, this serves as notice as of December 15, 2014, MTHC customers will need to choose a different internet provider.

CenturyLink appreciates MHTC as a customer, but we will no longer be able to continue the relationship as a result of our updating the network.

Please let me know if you have any questions.

Thank you,

Trey Albritton

Carrier Account Manager

100 CenturyLink Drive

Mailstop: LA00010501-5TS161

tel: 318.340.5155 fax: 318.340.5381

trey.albritton@centurylink.com



Attachment 2

From: Albritton, Trey E <Trey.Albritton@centurylink.com>
Sent: Tuesday, November 11, 2014 3:25 PM
To: John J. Dunbar
Cc: John A. Klarer
Subject: RE: Ethernet Conversion

Mr. Dunbar:

Unfortunately, we are unable to push this out any further than the original date of December 15, 2014.

Thank you,

Trey Albritton

Carrier Account Manager

100 CenturyLink Drive

Mailstop: LA00010501-5TS161

tel: 318.340.5155 fax: 318.340.5381

trey.albritton@centurylink.com



From: John J. Dunbar [mailto:John.Dunbar@mhtcinc.com]
Sent: Monday, November 10, 2014 1:54 PM
To: Albritton, Trey E
Cc: John A. Klarer
Subject: RE: Ethernet Conversion
Importance: High

Mr. Albritton

After careful review of your notice to discontinue service we are requesting a delay until March 1, 2015. This request is based on the impact on the end user customer. The end user will need time to locate and evaluate a new provider. In addition, those customers with a static IP and other complex configuration, are going to need time to deal with their specific needs. In fairness to the end user we believe this is a fair request.

Your prompted respond to this request would be appreciated.

John Dunbar
Assistant General Manager



John Dunbar

MHTC

Assistant General Manager

(608) 930-4710 Office

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305 N Iowa St, Dodgeville WI 53533

www.mhtc.net

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