

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

REPLY OF CENTURYLINK

CenturyLink, Inc. f/k/a CenturyTel, Inc. (CenturyLink) files this response to MH Telecom’s comments on CenturyLink’s application (Application) to discontinue its Frame Relay (CenturyTel Frame Relay) and Asynchronous Transfer Mode (CenturyTel ATM) services.¹ As discussed below, MH Telecom does not subscribe to CenturyTel Frame Relay or CenturyTel ATM service and therefore is not directly affected by CenturyLink’s proposed discontinuance of those services. Nevertheless, CenturyLink has agreed to MH Telecom’s request to extend until March 1, 2015 the discontinuation of any remaining ATM-based aggregation services CenturyLink provides to MH Telecom in Wisconsin. Given that no other party has objected to CenturyLink’s Application, the Commission should allow the Application to be granted automatically, pursuant to the terms of the Public Notice.²

¹ See *In the Matter of Section 63.71 Application of CenturyLink, Inc. f/k/a CenturyTel, Inc. for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended to Discontinue the Provision of Service*, Section 63.71 Application, WC Docket No. 14-169 (filed Aug. 26, 2014) (Application); Comments of MH Telecom, WC Docket No. 14-169 (Nov. 13, 2014).

² Comments on the Application were due on December 1, 2014. See *Application of CenturyLink, Inc. f/k/a CenturyTel, Inc. to Discontinue Domestic Telecommunications Services*, Public Notice, WC Docket No. 14-169 (Oct. 31, 2014) (Public Notice). According to the Public Notice, absent further Commission action, CenturyLink may grandfather and discontinue the CenturyTel Frame Relay and ATM services “on or after December 31, 2014, in accordance with its filed

In the Application, CenturyLink seeks authority to discontinue the ATM and Frame Relay services it provides in CenturyTel serving areas. MH Telecom is not a subscriber to either of these services. Instead, it is an Internet Service Provider (ISP) that buys wholesale DSL and ATM-based aggregation services from CenturyLink in certain areas in Wisconsin. Consistent with the *Wireline Broadband Order*,³ CenturyLink provides these wholesale services to MH Telecom on a private carriage basis.

CenturyLink is in the midst of upgrading its DSL aggregation services from ATM to Ethernet, which will enable it to offer more capable broadband services to its end user customers. Under its business plan, however, CenturyLink will not provide these Ethernet-based aggregation services on a wholesale basis. As a result, CenturyLink notified MH Telecom at the end of October that it would no longer be able to purchase CenturyLink's ATM-based aggregation services in the Platteville market area after December 15, 2014.

It appears that MH Telecom may have confused this pending network upgrade with CenturyLink's proposed discontinuance of CenturyTel ATM service. Because MH Telecom is not a CenturyTel ATM or Frame Relay subscriber, CenturyLink was not required to provide it notice of the proposed discontinuance of those services.

Nevertheless, after further consideration, CenturyLink has agreed to MH Telecom's request to allow MH Telecom until March 1, 2015 to transition its end user customers that are

representations." *Id.* at 2. CenturyLink's "filed representations" now include its commitment regarding the aggregation services it provides to MH Telecom.

³ See *In the Matter of Appropriate Framework for Broadband Access to the Internet over Wireline Facilities; Universal Service Obligations of Broadband Providers, et al.*, Report and Order and Notice of Proposed Rulemaking, CC Docket Nos. 02-33 and 01-337, *et al.*, 20 FCC Rcd 14853, 14909-10 ¶ 103 (rel. Sept. 23, 2005) (*Wireline Broadband Order*), *subsequent history omitted*.

served via the ATM-based aggregation services it purchases from CenturyLink.⁴ Given that CenturyLink has agreed to this request, and no other comments have been filed on the Application, the Commission should allow the Application to be granted automatically pursuant to terms of the Public Notice.

Respectfully submitted,

CENTURYLINK

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Its Attorney

December 16, 2014

⁴ CenturyLink notified MH Telecom of this extension by email on November 20, 2014.

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing **REPLY OF CENTURYLINK** to be served on the persons and in the manner indicated below:

Carmell Weathers
Wireline Competition Bureau
Federal Communications Commission
One copy via facsimile:
202-418-1413

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One copy each via (1) first class U.S.
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/s/ Marjorie Herlth _____

December 16, 2014