

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

In the Matter of	)	
	)	
CenturyLink’s Proposal for Service-Based	)	
Technology Transitions Experiments	)	GN Docket No. 13-5
and Request for a Declaratory Ruling	)	GN Docket No. 12-353
	)	
	)	

**Comments of  
Communications Workers of America**

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In response to the Commission’s Public Notice seeking comment on CenturyLink’s (“CenturyLink”) Proposal for an IP Service Trial in Las Vegas, Nevada,<sup>1</sup> the Communications Workers of America (“CWA”) submits these comments in general support of CenturyLink’s Proposal for an IP Service Trial in Las Vegas, Nevada and in support of its request for a declaratory ruling to confirm that this trial does not affect its preexisting requirements related to the exchange of voice traffic.<sup>2</sup> CWA represents 700,000 workers in communications, media, airlines, manufacturing, and public service, including 15,000 employees at CenturyLink.

CenturyLink states that the proposed six-month trial is designed to explore the impact of the TDM-to-IP transition on business end users and providers exchanging Voice over Internet Protocol (VoIP) traffic through commercially-negotiated connectivity utilizing Session Initiation Protocol (SIP) in twelve wire centers in Las Vegas.<sup>3</sup> Two CLECs – Bandwidth.com and Inteliquent -- will join CenturyLink’s CLEC affiliate in the trial. The purpose of the trial is to enable CenturyLink and the participating CLECS to “work through operational, technical, and logistical issues associated with the transition;” to provide the Commission and other parties with information to protect the “enduring values” of competition, universal service, consumer protection, and public safety and national security in the larger IP transition; and to serve as a complement to AT&T’s consumer-centered trials in Carbon Hill, AL and Kings Point, FL.<sup>4</sup>

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<sup>1</sup> Public Notice, Commission Seeks Comment on CenturyLink’s Proposal for Service Based Technology Transitions Experiments and Request for Declaratory Ruling, GN Docket Nos. 12-353 and 13-5, Nov. 21, 2014.

<sup>2</sup> *In the Matter of Technology Transitions and AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, CenturyLink Proposal for IP Service Trial and Request for Declaratory Ruling, GN Docket Nos. 13-5 and 12-353, Nov. 12, 2014 (“CenturyLink Proposal”).

<sup>3</sup> *Id.*, p. 2.

<sup>4</sup> *Id.*, p. 3.

CenturyLink explains that the trial will be very narrow in scope, will have no effect on retail or wholesale customers who do not participate in the trial, does not involve discontinuance of any services, and does not require a waiver of any of the Commission's rules.<sup>5</sup> In its IP Transition Operating Plan, CenturyLink makes commitments to maintain existing levels of public safety and national security on its network, maintain and enhance universal access, preserve consumer privacy, and promote competition.<sup>6</sup>

CWA has been supportive of the Commission's technology transitions trials as a means to gain real-world insight into the opportunities and challenges that IP networks provide. As we noted in our comments on AT&T's proposed trials, the transition from circuit-switched to all IP networks in many instances offers new and improved advanced digital services that benefit consumers, businesses, and public institutions. At the same time, the IP transition raises challenging issues which are best addressed through trials subject to FCC approval and oversight. The trials must protect consumers while providing the data needed to inform the complex operational, legal, and policy questions as carriers transition to IP-based services in a manner that protects and promotes our nation's interest in safe, reliable, universal, affordable service and investments in job-creating high-quality networks.<sup>7</sup>

Further, it is critical to the success of any IP transition trial – and to the IP transition more broadly – that the work building, maintaining, and servicing the new networks is performed by skilled, career professionals. As CenturyLink transitions to new technologies, CWA fully expects

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<sup>5</sup> *Id.*, p. 9.

<sup>6</sup> *Id.*, pp. 15-17.

<sup>7</sup> See CWA Comments, In the Matter of Technology Transitions and AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket Nos. 13-5 and 12-353, March 21, 2014.

CenturyLink to train existing employees to perform the work on the IP networks, and to work with CWA to ensure that any redeployment of the workforce is done in a manner that maximizes job security and career opportunity. The transition to new technologies must not provide an excuse to contract the work out to vendors or move the work to non-union subsidiaries, blocking the opportunity of the existing workforce to transfer into jobs in the growing segments of the company. Such policies do not serve the public interest in good jobs, stable communities, and quality service.<sup>8</sup>

Based on the information provided by CenturyLink in its Proposal to the Commission and in a briefing to CWA, CWA generally supports CenturyLink's proposed IP Transition trial in Las Vegas. The trial indeed provides an opportunity to gain insight into the complex operational, technical, and policy issues involved in the TDM-to-IP transition for business and CLEC customers, in a manner that protects and promotes our nation's enduring values in communications networks that are safe, secure, reliable, universal, and affordable. CenturyLink's IP Trial Operating Plan details the data collection and reporting plan on an interim and final basis, including metrics comparing TDM and IP network performance regarding due dates missed, trouble reports, interconnection blocking, and network outages. CWA expects that this data will be made available to the public.

CWA also supports CenturyLink's request for a declaratory ruling that participation in this trial will not affect its preexisting regulatory obligations – or create new ones – regarding the exchange of voice traffic with other providers.

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<sup>8</sup> See CWA Comments, In the Matter of Technology Transitions, July 8, 2013, pp. 3-4.

Respectfully submitted,



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