

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Section 63.71 Application of)	
)	
Qwest Communications Company, LLC)	WC Docket No. 11-196
d/b/a CenturyLink QCC)	Comp. Pol. File No. 1025
)	
For Authority to Discontinue)	
Broadband Phone Service)	

REPLY

Qwest Communications Company, LLC, d/b/a CenturyLink QCC (CenturyLink) hereby responds to an Opposition, filed by a former customer,¹ to CenturyLink's application to discontinue its Broadband Phone Service(s) (BPS).² The Opposition provides no basis for the Commission to deny CenturyLink's application, and the Commission therefore should permit the application to be automatically granted.

The Opposition asserts two reasons to deny CenturyLink's application, both of which are false. First, the Opposition claims that CenturyLink's proposed discontinuance is "just a way of charging customers more for the same level of service." As noted in the Application, however, CenturyLink is discontinuing BPS because it has not been commercially successful, with as few as 30 customers in some states in which it is offered.³ While BPS customers could choose to transition to CenturyLink's traditional wireline telephone service, they also could transition to

¹ Comment of Jeff Smith (filed Nov. 17, 2011) (Opposition). While the Opposition was filed in WC Docket No. 11-191, it appears to have been intended to be filed in this docket.

² *Section 63.71 Application of Qwest Communications Company, LLC, d/b/a CenturyLink QCC, For Authority to Discontinue Broadband Phone Service*, WC Docket No. 11-196 (filed Nov. 17, 2011) (Application).

³ *Id.* at 2.

another provider of VoIP or another voice service, which is what many BPS customers have done.

Second, the Opposition claims that CenturyLink's notice to the customer was insufficient because it "usually takes 4-5 weeks" to port a telephone number. In fact, number porting is typically accomplished in two or three days. Approximately 1000 BPS customers have successfully ported their telephone number since CenturyLink provided notice of its proposed discontinuance.⁴

Thus, the Opposition provides no information that undermines CenturyLink's showing that BPS customers are able to find reasonable substitute service and that the proposed discontinuance will not otherwise adversely affect the public convenience and necessity. No other customer commented on CenturyLink's proposed discontinuance. As a result, the Commission should permit the Application to be automatically granted.

Respectfully submitted,

CENTURYLINK

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DATE: January 3, 2012

⁴ CenturyLink ported Mr. Smith's telephone number away from BPS on December 1, 2011.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY** to be:

1) filed with the Secretary of the FCC via the Electronic Comment Filing System in WC Docket No. 11-196, and 2) served via e-mail on Ms. Carmell Weathers and Mr. Rodney McDonald, Competition Policy Division, Wireline Competition Bureau, Federal Communications Commission, at Carmell.Weathers@fcc.gov and Rodney.McDonald@fcc.gov, respectively.

/s/ Richard Grozier

Richard Grozier

January 3, 2012