

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Application of Qwest Communications)	WC Docket No. 13-226
Company, LLC, D/B/A CenturyLink QCC to)	
Discontinue Domestic Telecommunications)	Comp. Pol. File No. 1126
)	
)	

COMMENTS OF INTERNATIONAL BUSINESS MACHINES CORPORATION

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December 2, 2013

International Business Machines Corporation (“IBM”) files its comments in this Section 214 proceeding pursuant to the invitation for comments on the Application of Qwest Communications Company, LLC D/B/A CenturyLink QCC (“CenturyLink”) to Discontinue Domestic Telecommunications Services published by the Federal Communications Commission (“Commission”) on November 15, 2013.

IBM provides CenturyLink QCC Frame Relay (“QCC FR”) services to certain IBM customers in conjunction with system integration services. CenturyLink’s plans to grandfather and eventually discontinue QCC FR services in its Service Areas on December 15, 2013 are inadequate to protect the reliability and security of critical portions of the United States national electric grid, the general public and the interests of at least one IBM customer, Xcel Energy Services, Inc. (“Xcel”), a public utility¹ (including Xcel’s customers in 5 states).

IBM currently provides systems integration support, including frame relay services, to Xcel electrical substations in 5 states, with more than 150 installations in place and others on order. These approximately 200 substations are unique, highly customized environments -- “high voltage locations” -- that are accessible only by highly trained personnel, and which require the use of specialized, long lead time engineering and construction skills to plan for and implement any change in equipment or infrastructure, including telecommunications equipment and infrastructure.²

IBM’s primary supply contract with CenturyLink, which covers most of the frame relay services CenturyLink proposes to discontinue, expires on June 30, 2014. IBM is in discussions with CenturyLink about extending that contract and other contracts under which CenturyLink currently provides frame relay services to IBM for use with Xcel, but there is no assurance that CenturyLink will extend these contracts on reasonable terms and conditions to provide continuity of QCC FR services for the period of time needed for IBM conduct a phased-in transition to replacement services. There are no adequate substitute or replacement services available in the time frame proposed by CenturyLink in the geographic locations in which CenturyLink currently provides QCC FR services, many of which are in remote areas. The implementation of substitute services in Xcel’s high voltage electrical substations will require unique engineering and construction skills and highly specialized equipment, all of which are subject to potential supply constraints as well as weather and other environmental considerations. In order to maintain the reliability and security of critical portions of the United States national electric grid and protect Xcel’s customers from potential interruptions and other adverse operational effects on electrical service, CenturyLink needs to continue to make QCC FR services available at least through December 31, 2017.

¹ IBM’s references to Xcel include, as apropos, references to Xcel’s operating public utility company affiliates, including Northern States Power Company, a Minnesota corporation (NSPM); Northern States Power Company, a Wisconsin corporation (NSPW); Public Service Company of Colorado; and Southwest Public Service Company.

² CenturyLink Technical Publication “High Voltage Protection” (June, 2013) provides insight into the complexity of the telecommunications planning and implementation aspects of such high voltage environments. This publication may be found at the following URL. <http://qwest.centurylink.com/techpub/77321/77321.pdf>

As a practical matter of project management, the approximately one year period of continued QCC FR services proposed by CenturyLink (continuing until December 31, 2014) is manifestly inadequate to properly plan for and implement the replacement of QCC FR services in highly customized installations located in more than 150 electrical substations spread out over 5 states. Even attempting to replace QCC FR services on such a short schedule would involve excessive and unnecessary risks of failure, including excessive risks to the reliability and security of critical portions of the electrical grid and even the potential for personal injury. Potential electrical service outages and the consequences to public safety occasioned by such outages present a whole other category of risk that cannot be managed effectively under the artificially short project schedule that would be imposed by CenturyLink's proposed grandfathering and discontinuance of services on December 15, 2013.³

IBM and Xcel have begun to evaluate how they might plan for and implement a replacement service for QCC FR in more than 150 Xcel high voltage electrical substations. At this early stage, we believe that a feasible, prudent and cost-effective schedule (with appropriate contingencies for weather and other factors) will require approximately 4 years to complete. IBM preliminarily estimates that design and engineering alone will require approximately 9 months (assuming that high voltage engineering resources are readily available throughout that period, which may not be the case), with implementation requiring a minimum of approximately 27 months, assuming no significant labor, weather or vendor related delays. This 4 year schedule will allow an orderly project planning process and maximize the efficient utilization of scarce high voltage engineering and construction resources. This type of phased-in transition is essential in order to properly effect a change as significant as the replacement of QCC FR services in Xcel's sui generis electrical substation operating environment.

IBM therefore requests that the Commission reject CenturyLink's Application as submitted, or in the alternative, direct CenturyLink to extend all of IBM's contracts for existing frame relay services through December 31, 2017 on reasonable terms and conditions. If CenturyLink modifies its application to provide for continuation of QCC FR through December 31, 2017, IBM will withdraw its objections to the Application.

³ IBM notes that numerous QCC FR circuits that CenturyLink proposes to replace are have been identified as priority circuits under the Department of Homeland Security's Telecommunications Service Priority (TSP) program, and numerous other such circuits are currently being evaluated under that program. Certain such circuits, and associated equipment, constitute federally regulated critical infrastructure under the Critical Infrastructures Protection Act of 2001, as amended.

Respectfully submitted,

INTERNATIONAL BUSINESS MACHINES
CORPORATION

by,

A handwritten signature in cursive script, reading "James C. Rendeiro III", is written over a horizontal line.

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