

COPY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Section 63.71 Application of)
)
Embarq Florida, Inc. d/b/a CenturyLink)
)
For Authority Pursuant to Section 214 of the)
Communications Act of 1934, As Amended,)
to Discontinue a Telecommunications)
Service)

WC Docket No. 20-_____



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COMMISSION
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SECTION 63.71 APPLICATION

Embarq Florida, Inc. d/b/a CenturyLink (CenturyLink) (FRN: 0001-8252-98)¹ seeks authority pursuant to Section 63.71 of the Federal Communications Commission’s (Commission) rules, 47 C.F.R. § 63.71, and Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, to discontinue legacy voice service provided to existing customers (Affected Service) in a portion of its Florida service area.

On March 30, 2020, CenturyLink sought authority to grandfather legacy voice service to existing customers in the Census blocks served by its remote terminal in Ozello, Florida, west of Crystal River, Florida (hereinafter, “Ozello”), as reflected in Attachments A and B.² The network transport facilities used to service this area cannot be repaired due to environmental

¹ Embarq Florida, Inc. is a subsidiary of CenturyLink, Inc. (FRN: 0018-6268-53) d/b/a Lumen Technologies (Lumen). The Lumen brand was launched on September 14, 2020. The legal name CenturyLink, Inc. is expected to be formally changed to Lumen Technologies, Inc. upon the completion of all applicable requirements.

² The map in Attachment A shows the affected geographic area. Attachment B provides a list of the affected Census blocks. Ozello is an unincorporated community in Citrus County, Florida, located between Crystal River and Homosassa on Florida’s gulf coast. USGS website, https://geonames.usgs.gov/apex/f?p=gnispq:3:0::NO::P3_FID:294878 (last visited Sept. 30, 2020).

restrictions and other considerations,³ and CenturyLink deemed it prudent to cease adding new legacy voice customers in this area while evaluating whether to replace those transport facilities or discontinue service in this area. CenturyLink's application to grandfather service was granted by operation of law on June 1, 2020.⁴

Based on further evaluation, including the fact that CenturyLink now has only eight customers in the affected service area, CenturyLink has decided to discontinue service to these remaining customers, as of November 2, 2020, or as soon thereafter as CenturyLink obtains Commission approval. The public convenience and necessity will not be adversely affected by this discontinuance, as the affected customers can seek alternative service arrangements from other providers that offer equivalent substitute services. Most notably, Charter Spectrum (hereinafter, Spectrum) offers Spectrum Voice in the affected service area, available on a standalone basis or bundled with high-speed broadband and/or TV service, and the three largest mobile wireless providers (AT&T, T-Mobile, and Verizon) serve this area as well.

This Application is eligible for automatic grant under 47 C.F.R. § 63.71(f)(2)(i), because Spectrum Voice is an adequate replacement for CenturyLink's legacy voice service and will remain available to these customers in the event the Application is granted.

CenturyLink submits the following information required by Sections 63.505, 63.71(c), and Section 63.602 of the Commission's rules:

³ Section 63.71 Application of Embarq Florida, Inc. d/b/a CenturyLink For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Grandfather a Telecommunications Service, WC Docket No. 20-94 (filed March 30, 2020).

⁴ See Comments Invited on Section 214 Application(s) To Grandfather Domestic Legacy Voice and/or Low Speed Data Service(s), WC Docket No. 20-94, Public Notice, DA 20-496 (rel. May 7, 2020) (noting that the application would be deemed granted automatically on June 1, 2020, unless the Commission notified the applicant that the grant would not be automatically effective).

1. **Information Required by 47 C.F.R. § 63.505 and § 63.71(c).**

a. **Name and address of carrier.**

Embarq Florida, Inc. d/b/a CenturyLink
100 CenturyLink Drive
Monroe, Louisiana 71203

b. **Date of planned service discontinuance, reduction or impairment.**

As of November 2, 2020, or as soon thereafter as the necessary regulatory approvals can be obtained, CenturyLink will no longer offer the Affected Service in Ozello.⁵

c. **Points of geographic areas of service affected.**

CenturyLink seeks authority to discontinue the Affected Service in the Census blocks served by its remote terminal in Ozello, Florida, west of Crystal River, Florida, as reflected in Attachments A and B.

d. **Brief description of the types of services affected.**

The Affected Service provides voice-grade telephonic communications channels that can be used to place or receive one call at a time and constitutes a “legacy voice service” pursuant to the Commission’s rules.⁶ While Ozello includes roughly 450 households, only eight of those households are currently served by CenturyLink.

The network transport facilities used to provide this service in Ozello have been in service for a long time and cannot be repaired due to environmental restrictions and other considerations. CenturyLink has concluded that the network deployment and investment

⁵ CenturyLink’s proposed discontinuance of this service includes two Census blocks—120174505001062 and 120174505001063—in which CenturyLink’s designation as an eligible telecommunications carrier (ETC) for voice service currently is not subject to Commission forbearance. CenturyLink intends to satisfy the obligation through “resale of another’s carrier’s services.” 47 U.S.C. §214(e)(1)(A).

⁶ See 47 C.F.R. § 63.71(k).

necessary to maintain service in this area will present substantial and potentially unrecoverable cost, including installation of several miles of fiber and upgrade or replacement of numerous utility poles, given its small number of remaining customers and the abundance of alternative providers in Ozello. CenturyLink therefore believes it is prudent to discontinue service now, while its network transport facilities in this area are still operational, to allow its remaining customers to transition to alternative providers should they elect to maintain wireline voice service.

e. Brief description of the dates and methods of notice to all affected customers.

CenturyLink notified its customers in Ozello of the planned discontinuance of the Affected Service in a letter sent via United Service Parcel Service or U.S. Mail on September 29, 2020. Those customers were notified that the proposed discontinuance would take effect on November 2, 2020, or as soon after that date as authorized by the relevant regulatory commissions. A copy of the form of customer notification letter CenturyLink used is appended hereto. (See Attachment C.) That letter includes the information required by 47 C.F.R. § 63.71(a)(6) for the Application to be eligible for automatic grant under 47 C.F.R. § 63.71(f).

f. Whether the carrier is considered dominant or non-dominant with respect to the services to be discontinued, reduced or impaired.

CenturyLink is a non-dominant carrier with regard to the service to be discontinued.

g. Service.

In accordance with 47 C.F.R. § 63.71(a), CenturyLink has mailed a copy of this application to the Governor of Florida and the Florida Public Service Commission, as well as to the Special Assistant for Telecommunications under the Secretary of Defense.⁷ There are no

⁷ Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the

federally-recognized Tribal Nations with Tribal lands in the geographic areas identified in Paragraph 1.a above.

h. Applicable Tariff Listing (47 C.F.R. § 63.505(e)).

Spectrum Voice is not tarified, but the rates for that service are available on Spectrum's website, as noted below.

i. Number of Toll Messages (47 C.F.R. § 63.505(l)).

CenturyLink's toll traffic to and from Ozello has steadily fallen with the migration of nearly all its legacy voice customers in that area to other alternatives. CenturyLink does not track the monthly number of toll messages or toll revenues in this area.

2. Additional Information Required by 47 C.F.R. § 63.602

a. Statement Identifying the Application as a Technology Transition (47 C.F.R. § 63.602(a)(2)).

The proposed discontinuance constitutes a "technology transition,"⁸ because CenturyLink's remaining legacy voice customers in Ozello will be required to replace their TDM-based voice service with a different technology or transmission medium when CenturyLink discontinues legacy voice service in this area, as there is no other TDM-based voice service available in the affected service area.

Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

⁸ See 47 C.F.R. § 63.60(i) (defining a technology transition as "any change in service that would result in the replacement of a wireline TDM-based voice service with a service using a different technology or medium for transmission to the end user, whether Internet Protocol (IP), wireless, or another type," except in certain copper retirement situations).

b. Information Regarding the Price of the Service to be Discontinued and the Price of the Proposed Replacement Service (47 C.F.R. § 63.602(a)(3)).

CenturyLink's residential single-line voice service is \$26.50 per month, plus taxes, surcharges, and fees. Long distance and calling features are available for an additional monthly charge.

When purchased on a standalone basis, Spectrum's current price for its Spectrum Voice Package, which includes unlimited long distance and various calling features, is \$29.99 per month, plus taxes, surcharges, and fees. When purchased with Internet and/or TV service, the Spectrum Voice Package is priced at \$9.99 per month, plus taxes, surcharges, and fees.⁹

c. Certification that the Information Submitted in this Application Pursuant to Section 63.602 Is True and Accurate (47 C.F.R. § 63.602(a)(4)).

See the attached certification of Danny Pate.¹⁰

d. Showing that the Proposed Replacement Service Is an Adequate Replacement for the Service to Be Discontinued (47 C.F.R. § 63.602(b)).

In 2016, the Commission established a streamlined process for addressing Section 214 discontinuance applications that relate to "technology transitions," where the applicant is seeking to discontinue a legacy TDM-based voice service as part of a transition to a new technology, whether IP, wireless or another type, and there will no longer be TDM-based voice service available in the affected service area.¹¹ Under the Adequate Replacement Test adopted in that

⁹ Spectrum website, *Spectrum Voice Residential Services Price Guide*, <https://www.spectrum.com/policies/twc-voice-price-guide> (last visited Sept. 28, 2020).

¹⁰ See Attachment D, Section 63.602(a)(4) Certification.

¹¹ *Technology Transitions; USTelecom Petition for Declaratory Ruling That Incumbent Local Exchange Carriers Are Non-Dominant in the Provision of Switched Access Services; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers*, Declaratory Ruling, GN Docket No. 135, et al., Second Report and Order, and Order on Reconsideration, 31 FCC Rcd 8283 (2016), *subsequent history omitted* ("2016 Technology Transition Order").

order, such discontinuance applications will be eligible for automatic grant if the applicant demonstrates that there is an adequate replacement for the legacy voice service being discontinued in the service area in question.¹² An applicant may do so “by certifying or showing that one or more replacement service(s) offers all of the following: (i) substantially similar levels of network infrastructure and service quality as the applicant service; (ii) compliance with existing federal and/or industry standards required to ensure that critical applications such as 911, network security, and applications for individuals with disabilities remain available; and (iii) interoperability and compatibility with an enumerated list of applications and functionalities determined to be key to consumers and competitors.”¹³ As discussed below, this application meets those three criteria and is therefore eligible for automatic grant under the streamlined process set forth in Section 63.71(f).

Under the framework adopted in the 2016 order, technology transition applicants can either demonstrate compliance with the enumerated criteria or make a demonstration that, “despite not being able to meet the criteria, the totality of the circumstances demonstrates that an adequate replacement nonetheless exists.”¹⁴ The Commission also explicitly found that both first and third party services are eligible as potential adequate replacement services, given that third party services have always been eligible for consideration under the 214 discontinuance process as potential adequate replacements.¹⁵ As the Commission noted, “[t]he question is whether an

¹² *Id.*, 31 FCC Rcd at 8304-05 ¶ 64.

¹³ *Id.*, 31 FCC Rcd at 8305 ¶ 65. *See also* 47 C.F.R. § 63.602 (specifying additional contents required in applications to discontinue service as part of a technology transition, including those required for applications relying on the Adequate Replacement Test).

¹⁴ *2016 Technology Transition Order*, 31 FCC Rcd at 8306 ¶ 67.

¹⁵ *Id.*, 31 FCC Rcd 8311-12 ¶ 84.

adequate replacement exists in the service area, not who provides the service that provides that adequate replacement.”¹⁶

The Commission recognized, however, that applicants will not be able to certify on behalf of a third party that the third party’s voice service meets the adequate replacement test’s three-part criteria.¹⁷ Instead, such applicants must “rely on the option of providing enough information to make an adequate showing to demonstrate that the third party service is an adequate replacement.”¹⁸ Specifically, applicants relying on a third party service must make a *prima facie* showing based on publicly available information as to whether the third party service meets the Commission’s adequate replacement test.¹⁹

CenturyLink hereby makes that *prima facie* showing:

- i. **Spectrum Voice Provides Substantially Similar Levels of Network Infrastructure and Service Quality as CenturyLink’s Legacy Voice Service (47 C.F.R. § 63.602(b)(1)).**

To satisfy the first prong of the adequate replacement test, the applicant must show that the adequate replacement service provides substantially similar network performance as the service being discontinued; substantially similar service availability as the service being discontinued; and coverage to the entire affected geographic service area.²⁰

Network Performance. In the *2016 Technology Transition Order*, the Commission identified two metrics for evaluating whether a replacement service provides substantially similar network performance to the legacy voice service being discontinued: latency and data

¹⁶ *Id.*, 31 FCC Rcd at 8312 ¶ 84.

¹⁷ *Id.*, 31 FCC Rcd at 8312 ¶ 85.

¹⁸ *Id.*

¹⁹ *Id.*, 31 FCC Rcd at 8312 ¶ 86. Any commenter opposing grant of such a Section 214 application must rebut the *prima facie* showing made by the applicant. *Id.*

loss.²¹ Consistent with the Commission's expectation in the *2016 Technology Transition Order*, CenturyLink is unable to test these aspects of Spectrum Voice. Nevertheless, the totality of the circumstances demonstrates that Spectrum Voice does provide substantially similar network performance to CenturyLink's legacy voice service. While Ozello includes roughly 450 households, only eight of those households are currently served by CenturyLink. The remaining customers in this area are served by other providers. Those wishing to retain a wireline voice service presumably subscribe to Spectrum Voice, as Spectrum appears to be the only other provider of wireline voice service, as well as the only wireline broadband service provider, in this area. Customer behavior strongly suggests that Spectrum Voice provides network performance that is equivalent to, or better than, CenturyLink's legacy voice service. CenturyLink voice subscriber numbers in Ozello have steadily declined over the years Spectrum has offered service in this area. That is exactly the opposite of what would be expected if Spectrum Voice provided inferior network performance, in the form of dropped calls or poor call quality, for example. Ultimately, such customer experience is of key importance, as the Commission recognized in 2016: "Our mission here is to ensure a customer experience with the replacement service that is substantially similar to the customer experience with the service being discontinued[.]"²²

Service Availability. Under the *2016 Technology Transition Order*, an applicant relying on its own replacement service must demonstrate a service availability of 99.99 percent for the replacement service.²³ Consistent with the Commission's expectations, CenturyLink lacks the

²⁰ *Id.*, 31 FCC Rcd at 8313 ¶ 89.

²¹ *Id.*, 31 FCC Rcd at 8316 ¶ 94.

²² *Id.*, 31 FCC Rcd at 8314 ¶ 92 (footnotes omitted).

²³ *Id.*, 31 FCC Rcd at 8323 ¶ 112.

ability to obtain testing data demonstrating the service availability of Spectrum Voice. Once again, however, the totality of the circumstances shows that Spectrum's service availability is substantially similar to that of CenturyLink's legacy voice service. If Spectrum Voice experienced noticeably more downtime than the CenturyLink service, one naturally would expect that consumers in this area would have returned to CenturyLink's legacy voice service. That has not occurred.

Network Coverage. In order to meet this aspect of the network performance prong, and be eligible for automatic grant, the applicant must show that either: (i) a single replacement service reaches the entire geographic footprint of the service area subject to discontinuance; or (ii) there are multiple providers who collectively cover the entirety of the affected service area.²⁴ Here, the affected service area is limited to the eight locations still subscribing to CenturyLink's legacy voice service, as CenturyLink has grandfathered service to the remaining locations in the Ozello service area.

Based on physical observation of Spectrum's facilities in this area and review of Spectrum's website, CenturyLink believes that Spectrum Voice reaches all eight locations. Customers at these locations also have access to voice service from multiple mobile wireless providers.

ii. Spectrum Voice Provides Access to Critical Applications and Functionalities (47 C.F.R. § 63.602(b)(2)).

The second prong of the adequate replacement test requires applicants to show that the replacement service offers access to the following critical applications and functionalities: 911

²⁴ 2016 Technology Transition Order, 31 FCC Rcd at 8328 ¶ 123.

and emergency services; communications security; and services for individuals with disabilities.²⁵

911 and Emergency Services. To be eligible for automatic grant, applicants must certify or show that a replacement service complies with the Commission's requirements pertaining to accessible, accurate, and reliable 911 service.²⁶ These requirements include rules governing 911 call delivery, service, and location; the capabilities and routing necessary for consumers' continued access to 911 emergency service; and 911 calls to PSAPs or other appropriate local emergency authorities.²⁷ To the best of CenturyLink's knowledge, Spectrum Voice complies with these requirements. As a provider of interconnected VoIP service, Spectrum is subject to the Commission's 911 and E911 requirements for providers of that type.²⁸ Spectrum also is subject to the Commission's enforcement authority in the event it fails to comply with any of these requirements.

To the best of CenturyLink's knowledge, Spectrum Voice also offers a dispatchable address capability, as required by the Commission's rules.²⁹ Spectrum states on its website that, when calling 911, a Spectrum Voice subscriber's address "will be automatically provided, allowing the operator to dispatch help even if you can't speak."³⁰

²⁵ *2016 Technology Transition Order*, 31 FCC Rcd at 8329 ¶ 126.

²⁶ *Id.*, 31 FCC Rcd at 8329 ¶ 127.

²⁷ *Id.*, 31 FCC Rcd at 8329 ¶ 128.

²⁸ *See* 47 C.F.R. §§ 9.11, 20.3.

²⁹ *See* 47 C.F.R. §§ 9.11 (currently requiring interconnected VoIP providers to transmit the caller's Registered Location for each call to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location).

³⁰ Spectrum website, *Spectrum Voice: General Information; 911 Information*, <https://www.spectrum.net/support/voice/spectrum-voice-phone-service/> (last visited Sept. 28,

To the best of CenturyLink's knowledge, Spectrum Voice also complies with the Commission's residential backup power requirements in Section 19.19 of the Commission's rules.³¹ Spectrum offers battery-powered backup to its phone modems, which enables its voice service to remain active in the event of an electrical power outage. Spectrum offers batteries that will provide up to 8 or 24 hours of standby power.³²

To successfully meet this second prong, an applicant also must certify or show compliance with 911 network reliability requirements.³³ CenturyLink will continue to serve PSAPs in this area, despite the proposed discontinuance of its legacy voice service in Ozello. CenturyLink certifies that it complies with 911 network reliability requirements.³⁴

Network Security. To remain eligible for automatic grant, an applicant must certify or show that the replacement service offers comparably effective protection from network security risks.³⁵ If relying on a third party service, an applicant "must exercise reasonable diligence to

2020). Spectrum Voice subscribers also are directed to contact Spectrum to update their service address, as necessary, to ensure 911 calls are properly routed. *Id.*

³¹ See 47 C.F.R. § 9.20. After the issuance of the *2016 Technology Transition Order*, the backup power requirements for facilities-based, fixed residential service were moved from Section 12.5 to Section 9.20. See *Implementing Kari's Law and Section 506 of RAY BAUM's Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems; Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules*, PS Docket No. 18-261, et al., Report and Order, 34 FCC Rcd 6607 (2019).

³² Spectrum website, *Spectrum Voice: Battery Backup*, <https://www.spectrum.net/support/voice/spectrum-voice-battery-backup/> (last visited Sept. 28, 2020).

³³ *2016 Technology Transition Order*, 31 FCC Rcd at 8332 ¶ 134.

³⁴ See 47 C.F.R. § 9.19.

³⁵ *2016 Technology Transition Order*, 31 FCC Rcd at 8333 ¶ 136.

identify the security profile . . . of the replacement service, based on the replacement technology's ability to provide availability, integrity, and confidentiality.”³⁶

To the best of CenturyLink's knowledge, Spectrum Voice offers comparably effective protection from network security risks as the legacy voice service CenturyLink seeks to discontinue. Given the prevalence of VoIP services today, security practices for those services are mature and well developed. In 2005, the National Institute of Standards and Technology (NIST) developed recommendations for ensuring the security of VoIP services.³⁷ Various publicly available white papers identify similar countermeasures.³⁸ Among other things, the NIST publication identifies potential risks, threats, and vulnerabilities in a VoIP environment and the best practices available to counter those issues.³⁹ Of course, Spectrum has distinct market-based incentives to protect their networks from attacks, given the harm and adverse publicity that would undoubtedly follow a successful significant attack.

Accessibility, Usability, and Compatibility. To the best of CenturyLink's knowledge Spectrum Voice complies with the Commission's applicable accessibility, usability, and compatibility requirements governing services benefiting individuals with disabilities, thus ensuring that it offers accessibility levels at least as effective as those offered by CenturyLink's legacy voice service.⁴⁰ The Commission's rules in this area apply equally to TDM-based and

³⁶ *Id.*, 31 FCC Rcd at 8335 ¶ 141.

³⁷ D. Richard Kuhn, Thomas J. Walsh, Steffen Fries, NIST, *Security Considerations for Voice Over IP Systems*, Special Publication 800-58 (2005), available at <https://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-58.pdf>.

³⁸ *See, e.g.*, Joel Chapman, SANS Institute, *Security Considerations for Voice over Wi-Fi (VoWiFi) Systems* (2019), available at <https://www.sans.org/reading-room/whitepapers/voip/security-considerations-voice-wi-fi-vowifi-systems-38945>.

³⁹ *Id.* at 81-87.

⁴⁰ *See 2016 Technology Transition Order*, 31 FCC Rcd at 8338 ¶ 146.

interconnected VoIP service, such as Spectrum Voice. Indeed, the Commission recognized in the *2016 Technology Transition Order* that the “rules of the road” for accessibility already have been established in the Commission’s rules.⁴¹ Spectrum also remains subject to Telecommunications Relay Service (TRS) rules applicable to interconnected VoIP providers.⁴² According to Spectrum’s website, Teletypewriter and TRS are accessibility options available to Spectrum Voice customers with a hearing impairment.⁴³

iii. Spectrum Voice Is Interoperable with Applications and Functionalities That Are Key to Consumers and Competitors (47 C.F.R. § 63.602(b)(3)).

Under the third prong of the adequate replacement test, an applicant must show that a replacement service offers compatibility with an enumerated set of applications and functionalities, including the following low-speed modem services: fax machines, home security alarms, medical monitoring devices, analog-only caption telephone sets, and point-of-sale terminals.⁴⁴ To the best of CenturyLink’s knowledge, Spectrum Voice fulfills this requirement. For example, Spectrum provides instructions on its website for connecting fax machines to the

⁴¹ *Id.*, 31 FCC Rcd at 8339 ¶ 149. The Commission also reminded carriers and interconnected VoIP service providers “of their obligation under the existing telecommunications relay service rules to provide access to TRS, including 711 dialing access.” *Id.*, 31 FCC Rcd at 8339 ¶ 151.

⁴² See, e.g., *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, CG Docket No. 16-145; GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568 (2016).

⁴³ Spectrum Website, *Spectrum Voice: TTY and TRS Information*, <https://www.spectrum.net/support/voice/spectrum-voice-tty-and-trs-information> (last visited Sept. 28, 2020).

⁴⁴ See *2016 Technology Transition Order*, 31 FCC Rcd at 8341-45 ¶¶ 157-170.

customer's wall phone jack.⁴⁵ The Spectrum service also works with most monitored home security systems and "life alert" systems (*i.e.*, medical monitoring devices) systems.⁴⁶ CenturyLink was unable to find information specifically addressing Spectrum Voice's compatibility with analog-only caption telephones, but it appears that VoIP is compatible with many of these devices.⁴⁷ At least for business customers, Spectrum's voice service also is compatible with most point-of-sale terminals.⁴⁸

Also, in adopting the Alternative Options Test, the Commission found it unnecessary in the *Wireline Infrastructure Order* to include a requirement that services meeting that test, including the standalone interconnected VoIP service offered by the applicant, be interoperable with third-party devices and services such as alarm monitoring services. The Commission noted the existence of significant intermodal competition in the provision of those services and that "the marketplace has already recognized the value of such interoperability, and carrier have largely designed their networks and services accordingly."⁴⁹

⁴⁵ Spectrum website, *How To Connect Your Fax Machine*, <https://www.spectrum.net/support/internet/how-connect-your-fax-machine> (last visited Sept. 28, 2020).

⁴⁶ Spectrum website, *Spectrum Voice: General Information*, <https://www.spectrum.net/support/voice/spectrum-voice-phone-service/> (last visited Sept. 28, 2020).

⁴⁷ See, e.g., CapTel website, *Captioned Phones for Hearing Loss FAQs*, <https://www.captel.com/2019/11/captioned-phones-for-hearing-loss-faqs/> (last visited Sept. 28, 2020).

⁴⁸ Spectrum website, *Spectrum Business Phone*, <https://business.spectrum.com/phone> (last visited Sept. 28, 2020). Point-of-sale terminals typically are used by business, rather than residential, customers. CenturyLink was unable to find information regarding the compatibility of Spectrum's residential voice service with these terminals.

⁴⁹ *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Order, 33 FCC Rcd 5660, 5676 ¶ 34 (2018), *subsequent history omitted (Wireline Infrastructure Order)*.

4. **Conclusion.**

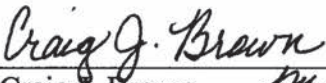
As demonstrated above, CenturyLink meets each of the Commission's criteria for discontinuing service under Section 63.71 of the Commission's rules and qualifies for automatic grant under Section 63.71(f)(2)(i) of those rules. As a result, the public convenience and necessity will not be adversely affected by the discontinuance of CenturyLink's legacy voice service in the affected service area. Advance notice has been provided to all affected customers, giving them ample time to arrange substitute services, which are readily available from other providers, including Spectrum, which offers a voice service that is an adequate substitute for CenturyLink's legacy voice service. CenturyLink therefore respectfully requests that the Commission approve this Section 63.71 application.

Respectfully submitted,

CENTURYLINK

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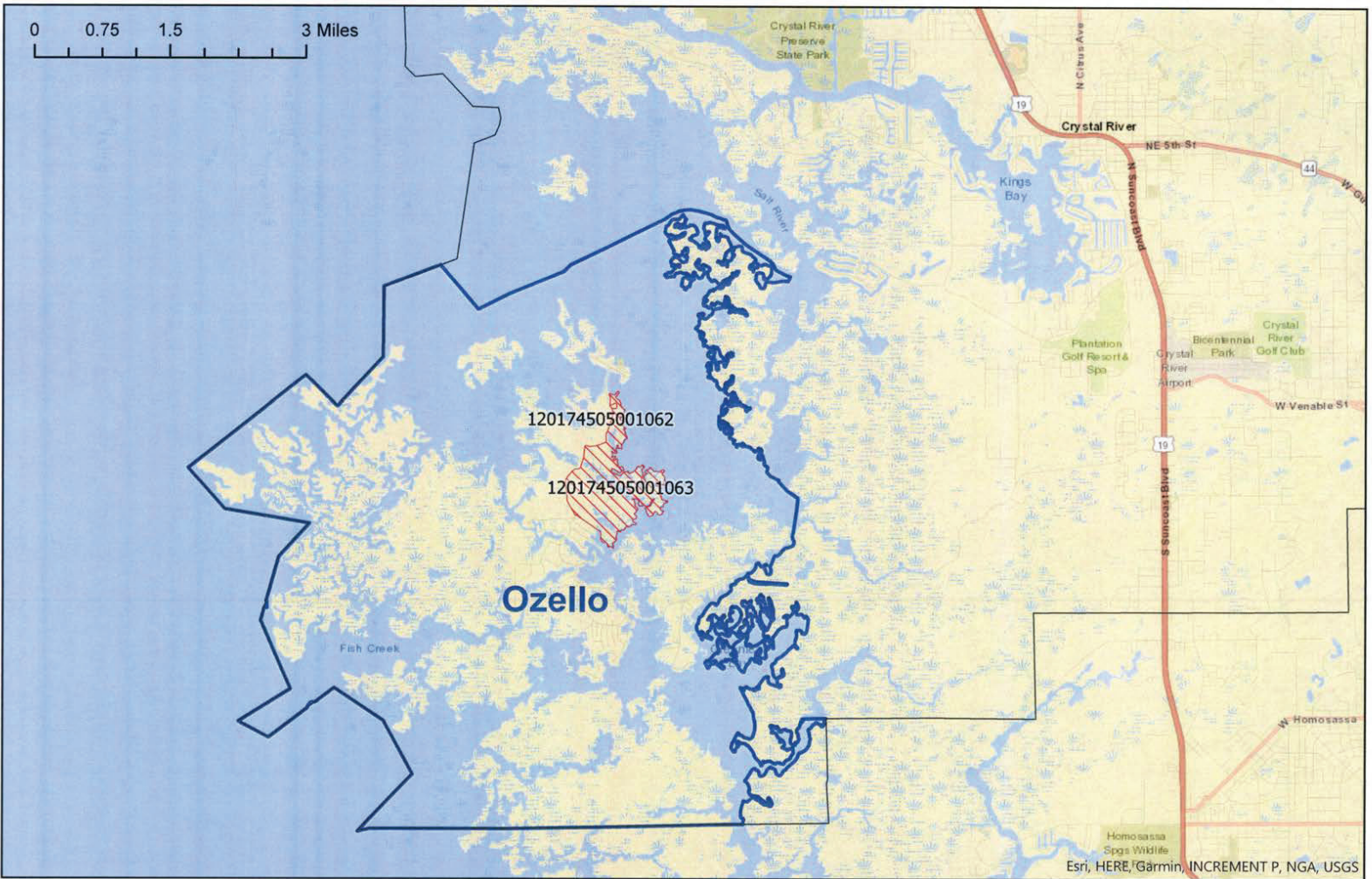
Its Attorney

DATE: September 30, 2020



Attachment A Ozello Area, Citrus County, FL

Affected Area Wire Center Pending FL PSC Approval



Boundary of affected area aligns to 2010 Census blocks.

Attachment B
Affected 2010 Census Blocks

State	Census Block	
FL	120174505001037	
FL	120174505001038	
FL	120174505001039	
FL	120174505001043	
FL	120174505001044	
FL	120174505001045	
FL	120174505001046	
FL	120174505001047	
FL	120174505001048	
FL	120174505001050	
FL	120174505001051	
FL	120174505001052	
FL	120174505001053	
FL	120174505001054	
FL	120174505001055	
FL	120174505001056	
FL	120174505001057	
FL	120174505001058	
FL	120174505001059	
FL	120174505001060	
FL	120174505001061	
FL	120174505001062	(Pending FL PSC Approval)
FL	120174505001063	(Pending FL PSC Approval)
FL	120174505001064	
FL	120174505001065	
FL	120174505001066	
FL	120174505001067	
FL	120174505001068	
FL	120174505001069	
FL	120174505001070	
FL	120174505001071	
FL	120174505001072	

Attachment B
Affected 2010 Census Blocks

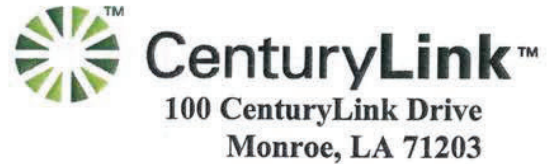
State	Census Block
FL	120174505001073
FL	120174505001074
FL	120174505001075
FL	120174505001076
FL	120174505001077
FL	120174505001078
FL	120174505001083
FL	120174505001084
FL	120174505001090
FL	120174505001095
FL	120174505001100
FL	120174505001101
FL	120174505001102
FL	120174505001104
FL	120174505001107
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FL	120174505001115
FL	120174505001116
FL	120174505001117
FL	120174505001118
FL	120174505001119
FL	120174505001120
FL	120174505001121
FL	120174505001124
FL	120174505001125
FL	120174505001126
FL	120174505001128
FL	120174505001130
FL	120174505001135

Attachment B
Affected 2010 Census Blocks

State	Census Block
FL	120174505001136
FL	120174505001137
FL	120174505001138
FL	120174505001139
FL	120174505001142
FL	120174505001143
FL	120174505001144
FL	120174505001145
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FL	120174505001160
FL	120174505001161
FL	120174505001166
FL	120174505001172
FL	120174517001011
FL	120174517001012
FL	120174517001013
FL	120174517001014
FL	120174517001015
FL	120174517001016
FL	120174517001017

Attachment B
Affected 2010 Census Blocks

State	Census Block
FL	120174517001018
FL	120174517001019
FL	120174517001020
FL	120174517001021
FL	120174517001022
FL	120174517001023
FL	120174517001024
FL	120174517001025
FL	120174517001027
FL	120174517001028
FL	120174517001125
FL	120174517001126
FL	120174517001131
FL	120174517001133
FL	120174517001134
FL	120174517001135
FL	120174517001138
FL	120174517001139
FL	120174517001227



September 29, 2020

[Customer Name]
[Address]
[City, State, Zip]

Important Notice Regarding the Plan of Embarq Florida, Inc. d/b/a CenturyLink to Discontinue a Telecommunications Service

Dear [Customer]

At CenturyLink, our goal is to provide our customers with great quality and value in our world of changing technologies and market conditions. To do so, we continually evaluate our prices, product offerings and infrastructure. Occasionally our evaluation directs us to make changes to some products, or to cease providing them.

On March 30, 2020, we notified you that Embarq Florida, Inc. d/b/a CenturyLink was ceasing to offer legacy voice service to new customers in the Census blocks served by its remote terminal in Ozello, Florida, west of Crystal River, Florida.¹ This service, to which you currently subscribe, provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.

After further consideration, CenturyLink has decided that it must discontinue its provision of legacy voice service to current subscribers in this area. (See the attached map of the affected geographic area and a list showing the affected Census blocks.) CenturyLink is taking these actions because the network transport facilities used to provide its legacy voice service in the affected area are near the end of their service life and cannot be repaired due to environmental restrictions and other considerations.

We plan to discontinue legacy voice service in this area on November 2, 2020, subject to any necessary regulatory approvals, including from the Federal Communications Commission. There are other voice services available in your area as a replacement for CenturyLink's legacy voice service.

Spectrum offers Spectrum Voice, which is a wireline phone service. **Attachment A provides important information regarding Spectrum Voice service, including the need for Spectrum Voice customers to contact Spectrum if they move to a different address, to ensure that 911 calls are properly routed and the option of purchasing a battery backup to keep the service operational during an electric power outage.**

¹ A Census block is a geographic unit used by the U.S. Census Bureau to identify geographic areas within the United States.

ATTACHMENT C

Other providers in this area offer mobile wireless services, which provide additional alternatives to CenturyLink's legacy voice service.

You are receiving this notice because you currently subscribe to CenturyLink legacy voice service in this area. If you have not made arrangements with another service provider to replace your CenturyLink legacy voice service prior to November 2, 2020, your service will be disconnected at that time, assuming CenturyLink has obtained necessary regulatory approvals. We therefore urge you promptly to seek service from another provider.

We appreciate your business and hope that we have an opportunity to serve you in the future.

Please contact Patty Schiefer at (352) 368-8706 if you have any questions or concerns about these changes.

Sincerely,

Danny Pate
Vice President, Operations
CenturyLink

The following statement is required by the FCC:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Embarq Florida, Inc. d/b/a CenturyLink to Discontinue a Telecommunications Service. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

ATTACHMENT C

Attachment A: Important Information Regarding Spectrum Voice Service

- *Lack of Line Power.* The Spectrum Voice phone service may not provide line power to keep it operational during an electrical power outage. To maintain phone service during these times, you will have to arrange for an alternative source of electrical power for your phone modem (Multimedia Terminal Adapter or MTA).
- *Optional Backup Power*
 - *Capability to Accept Backup Power.* If there is an electrical power outage that affects your home, your Spectrum Voice service will remain active if your phone modem has battery-powered backup, the backup stays charged, and your cable connection is not affected.
 - *Purchase and Replacement Information, Including Cost.* You can purchase a backup battery directly from Spectrum for a one-time charge, by calling (833) 267-6094.² The cost, including installation, is \$89.99 for an 8-hour battery and \$109.99 for the 24-hour battery.

If your battery no longer keeps a charge, you can purchase a replacement from Spectrum or the manufacturer of the Spectrum modem. Additional information about these backup batteries is available on Spectrum's website (<https://www.spectrum.net/support/voice/spectrum-voice-battery-backup/>) or by calling (833) 267-6094.

Alternatively, you may be able to purchase and arrange for installation of an Uninterruptible Power Supply from a retail electronics store to maintain your phone service in the event of an electrical power outage.
 - *Service Limitations with and without Backup Power.* Backup power for your phone modem (whether purchased from Spectrum or a third party) will power Spectrum Voice equipment to work with standard corded phones but will not power other equipment not provided by Spectrum, like cordless phones or medical and security-monitoring systems.

To preserve battery life during a power outage, you should use your phone service sparingly and avoid using high-speed internet services.
 - *Expected Backup Power Duration.* Spectrum offers batteries that will provide up to 24 hours of standby power.
 - *Proper Usage and Storage Conditions, Including the Impact on Duration of Failing to Adhere to Proper Usage and Storage.* Batteries purchased from Spectrum can safely be stored at temperatures between -4°F and 140°F. Failure to properly use and store a backup battery may cause you to lose phone service in the event of a power outage.

² You can also order a battery backup when you set up new Spectrum voice installation. Customers who don't choose the battery backup or a battery-slotted modem at the time of ordering service can upgrade at any time by calling Spectrum. Existing customers will be charged a one-time standard fee for professional installation.

ATTACHMENT C

- *Subscriber Backup Power Self-Testing and -Monitoring Instructions.* You will be responsible for monitoring the status of the backup battery and making sure the battery is charging normally. You should check the condition of your backup battery at least twice a year.
- *Backup Power Warranty Details.* If you purchase your battery from Spectrum and it's defective, Spectrum will replace it for up to one year from the date of purchase. The battery comes with a standard one-year-from-date-of-purchase warranty from the manufacturer. Additional information is available on Spectrum's website (<https://www.spectrum.net/support/voice/spectrum-voice-battery-backup/>)
- *Security Responsibilities and Other Steps You May Take to Ensure Safe Use of Spectrum Voice Service.* As noted, Spectrum Voice phone equipment will not operate without backup power in the event of a power outage. In that situation, you won't be able to make or receive calls, including emergency 911 calls, unless you previously purchased a backup power source from Spectrum or a third party.

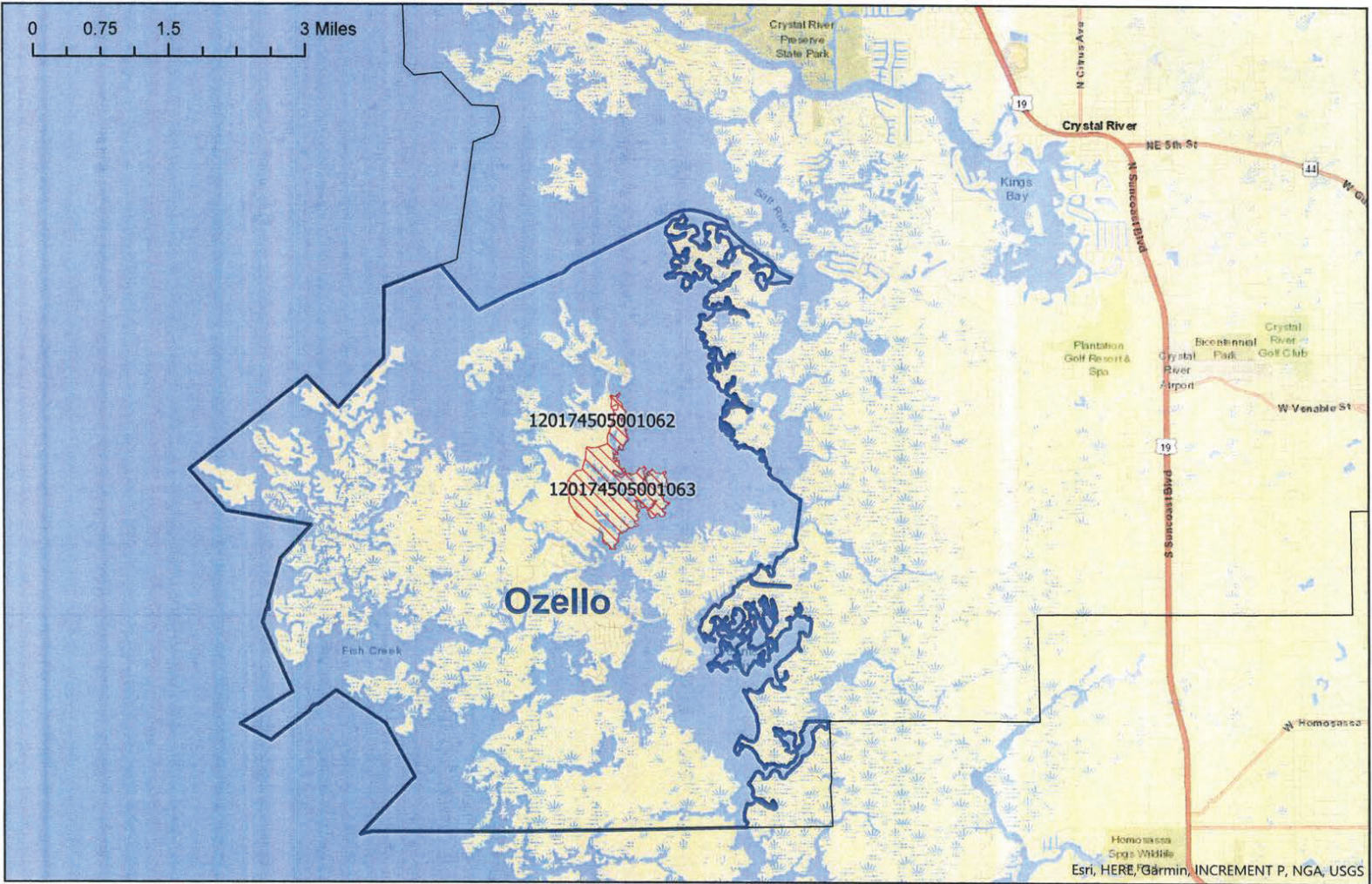
If you plan to move, and need to change your service address, you will need to contact Spectrum to properly move your service to ensure that 911 calls are properly routed. Do not move the phone modem installed in your home to another location without contacting Spectrum. Additional information is available on Spectrum's website. (<https://www.spectrum.net/support/voice/security-and-911-information>)



Ozello Area, Citrus County, FL

ATTACHMENT C

Affected Area Wire Center Pending FL PSC Approval



Boundary of affected area aligns to 2010 Census blocks.

jgbar

State	Census Block	
FL	120174505001037	
FL	120174505001038	
FL	120174505001039	
FL	120174505001043	
FL	120174505001044	
FL	120174505001045	
FL	120174505001046	
FL	120174505001047	
FL	120174505001048	
FL	120174505001050	
FL	120174505001051	
FL	120174505001052	
FL	120174505001053	
FL	120174505001054	
FL	120174505001055	
FL	120174505001056	
FL	120174505001057	
FL	120174505001058	
FL	120174505001059	
FL	120174505001060	
FL	120174505001061	
FL	120174505001062	(Pending FL PSC Approval)
FL	120174505001063	(Pending FL PSC Approval)
FL	120174505001064	
FL	120174505001065	
FL	120174505001066	
FL	120174505001067	
FL	120174505001068	
FL	120174505001069	
FL	120174505001070	
FL	120174505001071	
FL	120174505001072	

State	Census Block	
FL	120174505001037	
FL	120174505001038	
FL	120174505001039	
FL	120174505001043	
FL	120174505001044	
FL	120174505001045	
FL	120174505001046	
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FL	120174505001058	
FL	120174505001059	
FL	120174505001060	
FL	120174505001061	
FL	120174505001062	(Pending FL PSC Approval)
FL	120174505001063	(Pending FL PSC Approval)
FL	120174505001064	
FL	120174505001065	
FL	120174505001066	
FL	120174505001067	
FL	120174505001068	
FL	120174505001069	
FL	120174505001070	
FL	120174505001071	
FL	120174505001072	

State	Census Block
FL	120174505001073
FL	120174505001074
FL	120174505001075
FL	120174505001076
FL	120174505001077
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State	Census Block
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FL	120174505001138
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FL	120174505001143
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State	Census Block
FL	120174517001018
FL	120174517001019
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FL	120174517001227

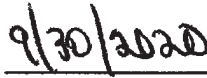
ATTACHMENT D

Section 63.602(a)(4) Certification

I, Danny Pate, certify under penalty of perjury that, to the best of my knowledge, information, and belief, the information required by 47 C.F.R. § 63.602 that is submitted in the Section 63.71 Application of Embarq Florida, Inc. d/b/a CenturyLink for Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue a Telecommunications Service is true and correct.



Danny Pate



Date

CenturyLink Vice President - Operations

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing **SECTION 63.71**

APPLICATION to be:

- 1) Filed with the Secretary of the FCC via ECFS (Inbox-Section 214 Domestic Discontinuance Application);
- 2) Served via first-class U.S. Mail, postage prepaid, or via email on the Governor of the State listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, or via email on the Public Utility Commission listed on the attached service list; and
- (4) Served via first-class U.S. Mail, postage prepaid, on the Special Assistant for Telecommunications under the Secretary of Defense¹.



Marjorie Herlth

September 30, 2020

¹ Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

Ron DeSantis
Office of Governor
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Secretary of Defense
Attn. Special Assistant for Telecommunications
Pentagon
Washington, DC 20301