

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

COPY

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

WC Docket No. 26-\_\_\_\_\_

**REDACTED**

**SECTION 63.71 APPLICATION**

RECEIVED-FPSC  
2026 JAN 14 11:08:56  
COMMISSION  
CLERK

Stephanie E. Minnock  
Lumen Technologies, Inc.  
660 North Capitol Street, NW  
Suite 240  
Washington, DC 20001  
(202) 519-2899  
[stephanie.minnock@lumen.com](mailto:stephanie.minnock@lumen.com)

Attorney For

January 7, 2026

Lumen Technologies, Inc.

## TABLE OF CONTENTS

## PAGE

I. Connected Voice with Air-Line Service is CenturyLink's Next-Generation Replacement for the Affected Service.....	5
A. Service Description .....	6
B. Network Architecture .....	9
C. Performance Testing.....	13
II. Application: Connected Voice with Air-Line Service Satisfies the Adequate Replacement Test.....	20
A. Regulatory Background.....	20
B. Connected Voice with Air-Line Service Satisfies Each Prong of the ART .....	21
C. Under the Totality of the Circumstances, Connected Voice with Air-Line Service Offers Substantially Similar Levels of Network Performance and Availability as the Affected Service and Is Available to All Customers in the Affected Service Area .....	22
D. Under the Totality of the Circumstances, Connected Voice with Air-Line Service Provides Substantially Similar Network Performance as Legacy Voice Service.....	22
E. Under the Totality of the Circumstances, Connected Voice with Air-Line Service has Service Availability that is Similar to the Service Being Discontinued .....	23
F. Connected Voice with Air-Line Service Reaches the Entire Affected Service Area .....	26
G. Connected Voice with Air-Line Service Offers Access to Critical Applications and Functionalities.....	27
1. 911 and Emergency Services.....	28
2. Network Security .....	29
3. Services for Individuals with Disabilities .....	32
H. Connected Voice with Air-Line Service Is Interoperable with Critical Applications and Functionalities That are Key to Consumers and Competitors .....	33
III. Additional Information Required by 47 CFR §§ 63.71, 63.602, and 63.505 .....	33
A. Name and Address of Carrier .....	34
B. Date of Planned Service Discontinuance .....	34
C. Points of Geographic Areas of Service Affected and Description of Affected Service Area.....	34
D. Brief Description of Type of Service Affected .....	34
E. Brief Description of Dates and Method of Notice to All Affected Customers .....	35
F. Regulatory Classification of Carrier.....	35
G. Statement Identifying the Application as a Technology Transition.....	35
H. Information Regarding the Price of the Service for Which Discontinuance Authority Is Sought and the Price of the Proposed Replacement Service .....	36

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Section 63.71 Application of	)	
	)	
CenturyLink of Florida, Inc.	)	WC Docket No. 26-_____
	)	
For Authority Pursuant to Section 214 of the	)	
Communications Act of 1934, As Amended,	)	
to Discontinue a Telecommunications	)	
Service	)	

**SECTION 63.71 APPLICATION**

CenturyLink of Florida, Inc. (FRN: 0001-8252-98) (CenturyLink)<sup>1</sup> seeks authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission’s (Commission’s) rules, 47 CFR § 63.71, to discontinue a legacy voice service (Affected Service) in portions of Kenansville, Florida.<sup>2</sup> The proposed discontinuance area is shown on the map in Attachment A (Affected Service Area).

---

<sup>1</sup> CenturyLink of Florida, Inc. is a subsidiary of Lumen Technologies, Inc. (FRN: 0018-6268-53) (Lumen) and affiliated with Lumen’s operating companies. This application uses “CenturyLink” generically throughout to instead of identifying Lumen or specifying the affiliated entity providing a specific resource.

<sup>2</sup> “Legacy voice service” refers to time-division multiplexing (TDM)-based voice service provided over copper infrastructure, which is also known as Plain Old Telephone Service (POTS).

I. Certification that the Information Submitted in this Application Is True and Accurate.....	36
J. Applicable Tariff Listing.....	36
K. Name of any other carrier or carriers providing telephone service to the community.....	37
L. Description of any Previous Discontinuance, Reduction, or Impairment of Service to the Community Affected by the Application.....	37
M. Number of Toll Messages.....	37
IV. CONCLUSION.....	37

## INTRODUCTION

Connected Voice with Air-Line service is CenturyLink's newest voice service offering under its "Connected Voice" category of Voice over Internet Protocol (VoIP) services.<sup>3</sup>

Connected Voice with Air-Line service is a technological upgrade for copper-based wireline services, allowing customers who love a landline to easily move away from traditional copper-based phone services. It is designed to be a seamless replacement for legacy voice service by blending the simplicity and familiarity of an existing home phone with future-ready Long-Term Evolution (LTE) VoIP technology – for clear, reliable calling without the worries of aging infrastructure or copper theft.

Connected Voice with Air-Line service offers consumers the benefits of next-generation technologies, which will fundamentally improve their voice telephony experience without compromising the reliable, cost-effective voice service they have long associated with CenturyLink. Connected Voice with Air-Line service improves upon legacy voice service by providing customers with more stable and reliable connectivity, reducing the likelihood of service interruptions, and ensuring more consistent network performance. Because the Air-Line adapter can use multiple methods for transmitting voice calls, *e.g.*, 4G LTE connectivity or high-speed internet, Connected Voice with Air-Line service offers customers greater redundancy and reliability than legacy voice services, which rely on copper infrastructure to transmit calls. Subscribing to Connected Voice with Air-Line service can reduce or eliminate the downtime associated with hard-to-service, copper-based legacy voice lines after a power outage or natural

---

<sup>3</sup> In early 2021, CenturyLink began offering Connected Voice service to residential customers through the entity Quantum Fiber. Quantum Fiber's footprint has expanded since that time, and, as of the end of 2024, had approximately 1 million fiber subscribers. Although not all fiber subscribers choose to subscribe to Connected Voice service, this information demonstrates that CenturyLink's Connected Voice service is an established residential voice service.

disaster. And, by replacing outdated copper-based systems with the Air-Line device, CenturyLink is laying the groundwork for future advancements in communications, ensuring that consumers can enjoy a superior voice experience over future-proof infrastructure. Moreover, Air-Line technology is more energy-efficient than copper-based wireline services, which reduces CenturyLink's environmental footprint. Finally, Connected Voice with Air-Line service is generally more cost-effective than legacy voice service, offering customers a lower base monthly rate and several calling features not included in basic legacy voice service at no additional fee.<sup>4</sup>

In this application, CenturyLink seeks authority to cease operation of the Affected Service in the Affected Service Area. CenturyLink seeks to discontinue service in the Affected Service Area as of March 31, 2026, or as soon thereafter as CenturyLink obtains Commission approval.

As of January 5, 2026, only six (6) customers, less than 3% of the living units in the Affected Service Area, still subscribe to the Affected Service.<sup>5</sup> Given that there is virtually no demand for this service in the Affected Service Area, discontinuing this service, which is outdated and prohibitively expensive for CenturyLink to maintain, will benefit the public and serve as an important step toward meeting the Commission's goals of advancing the IP revolution. As the Commission has explained, allowing carriers to promptly discontinue legacy services that are no longer in demand "enabl[es] carriers to more rapidly shift resources away from maintaining outdated legacy infrastructure and services," making "it more economically

---

<sup>4</sup> Connected Voice with Air-Line service is priced at \$30 per month, plus taxes and fees. CenturyLink's Residential Flat Rate Voice Service in the Affected Service Area is priced at \$36 per month, plus taxes and fees. Unlimited Home Phone, which includes unlimited nationwide calling, is priced at \$45 per month, plus taxes and fees.

<sup>5</sup> CenturyLink has identified 249 living units in the Affected Service Area.

feasible for carriers to extend the reach of their networks, increasing competition,” which will in turn lower prices for consumers.<sup>6</sup> With this modernization, carriers “can dramatically reduce network costs, allowing providers to serve customers with increased efficiencies that can lead to improved and innovative product offerings and lower prices.”<sup>7</sup> These changes will allow for “further investments in innovation that both enhance existing products and unleash new services, applications and devices, thus powering economic growth.”<sup>8</sup>

The public convenience and necessity will not be adversely affected by this discontinuance as affected customers have access to CenturyLink’s Connected Voice with Air-Line service, an internet protocol-based, over-the-top voice product that uses CenturyLink’s Air-Line adapter to access 4G LTE networks for the last-mile connection needed to provide CenturyLink’s Connected Voice service to customers.<sup>9</sup> Connected Voice with Air-Line service has been available nationwide to qualified customers since July 2025.<sup>10</sup> Additionally, customers

---

<sup>6</sup> *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Report and Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 32 FCC Rcd 11128, 11130 ¶ 3 (2017) (*Accelerating Wireline Broadband Deployment Order*).

<sup>7</sup> *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, 29 FCC Rcd 1433, 1436 ¶ 2 (2014) (*2014 Technology Transitions Order*).

<sup>8</sup> *2014 Technology Transitions Order* at ¶ 2.

<sup>9</sup> CenturyLink has endeavored to educate interested stakeholders about the capabilities and benefits on Connected Voice with Air-Line, including, but not limited to, providing customers in the Affected Service Area with a letter introducing and explaining the Connected Voice with Air-Line service, making information about Connected Voice with Air-Line service available on its website here: <https://www.centurylink.com/home/help/home-phone/connected-voice/lte-home-phone.html>, and making technical demonstrations of Connected Voice with Air-Line service for state and local entities in CenturyLink’s geographic footprint, including the Florida Public Service Commission staff.

<sup>10</sup> CenturyLink began offering Connected Voice with Air-Line service to new customers nationwide in July 2025 and expanded that offering to existing customers in October 2025. For

in the Affected Service Area will continue to have other cost-effective alternative options to choose from as replacements for the Affected Service, including competitive voice offerings offered over mobile wireless, fixed wireless, and satellite technologies.

In this application, CenturyLink demonstrates that, based on the totality of the circumstances, Connected Voice with Air-Line service is an adequate replacement for legacy voice service and satisfies the Adequate Replacement Test (ART) outlined in the Commission's *2016 Technology Transitions Order*.<sup>11</sup> CenturyLink also demonstrates that Connected Voice with Air-Line service complies with regulations regarding the availability and functionality of 911 service for consumers and public safety answering points and offers interoperability with key applications and functionalities. And, importantly, CenturyLink demonstrates that Connected Voice with Air-Line service is available to every CenturyLink customer in the Affected Service Area, as are voice offerings through mobile wireless, fixed wireless, and satellite technologies. Given these showings, this application is eligible for automatic grant under 47 CFR § 63.71(f)(2)(i).

## **I. CONNECTED VOICE WITH AIR-LINE SERVICE IS CENTURYLINK'S NEXT-GENERATION REPLACEMENT FOR THE AFFECTED SERVICE**

This section provides an overview of the Connected Voice with Air-Line service, its network architecture, and the testing done to demonstrate that it is an adequate replacement for legacy voice service. In the following section, Section II, CenturyLink explains how Connected Voice with Air-Line service meets the ART requirements, why the Commission should find that,

---

customers to qualify for the service, they must be in an area with adequate 4G LTE network coverage or have access to high-speed internet.

<sup>11</sup> *Technology Transitions et al.*, WC Docket No. 13-5 et al., Declaratory Ruling, Second Report and Order, and Order on Reconsideration, 31 FCC Rcd 8283 (2016) (*2016 Technology Transitions Order*).



based on the totality of the circumstances, Connected Voice with Air-Line service is an adequate replacement for the Affected Service, and that CenturyLink's discontinuance of the Affected Service will not impair the public convenience or necessity. In the final section, Section III, CenturyLink provides additional information required by Commission rules for discontinuance applications that involve a technology transition.

#### **A. Service Description**

Connected Voice with Air-Line service is an over-the-top VoIP product that allows legacy voice customers to access CenturyLink's established Connected Voice Basic service, a dependable VoIP service that CenturyLink has offered nationwide to qualified customers since 2022.<sup>12</sup> The Air-Line device is an LTE and ethernet-enabled analog telephone adapter that primarily uses LTE backhaul to deliver CenturyLink's Connected Voice service to customers seeking voice-only service.<sup>13</sup> Connected Voice with Air-Line service provides customers with unlimited local and long distance calling, voice mail, and multiple additional calling features not included in CenturyLink's basic local TDM-based voice service. The Air-Line adapter supports a separate external battery backup power unit that provides 24 hours of standby power so that customers can access their voice service during a power outage.<sup>14</sup>

Connected Voice with Air-Line service's default form of last-mile connectivity in the Affected Service Area is 4G LTE networks.<sup>15</sup> CenturyLink connects customers to these

---

<sup>12</sup> To qualify for fiber-based Connected Voice service, customers must be located in an area where CenturyLink has deployed fiber.

<sup>13</sup> The Air-Line device is leased to customers for \$0 per month. Equipment must be returned within 30 days after cancelling the service to avoid an equipment charge of up to \$200.

<sup>14</sup> The external battery backup is separately available for purchase for \$40.

<sup>15</sup> Users can also connect their internet service to the Air-Line device using an Ethernet cable, regardless of whether CenturyLink or another provider is providing that service, and receive

networks through Wavely, a Virtual Mobile Network Operator. Wavely provides CenturyLink access to more than one 4G LTE network, which means that customers will continue to receive reliable voice service even if one of the 4G LTE networks available in their area fails. In the event of a service outage or a connectivity issue with one provider's 4G LTE signal, Air-Line's automatic failover functionality switches the device to an alternate 4G LTE provider, without any action needed on the customer's part.<sup>16</sup>

Although the Air-Line device uses wireless backhaul for last-mile connectivity, the device is designed to remain in a single location in the customer's home. Customers who purchase Connected Voice with Air-Line service will be shipped the Air-Line device and associated peripherals at their service address.<sup>17</sup> Customers can self-install the device by following simple instructions included in the box.<sup>18</sup> The Air-Line adapter comes pre-provisioned, meaning that the device is ready to use right out of the box. Customers simply

---

Connected Voice with Air-Line service over the internet connection in the event that there is an interruption to their 4G LTE service.

<sup>16</sup> If the device needs to switch carriers while in a call, the call will terminate due to CenturyLink's network management and security practices. TLS encryption prevents calls from transferring from one network to another mid-call because it is designed to prevent new endpoints from establishing a connection with an ongoing call.

<sup>17</sup> After ordering Connected Voice with Air-Line service, customers will receive a box containing an Air-Line adapter, an RJ11 phone cord, a 6-foot DC power cord for the Air-Line device, a plastic vertical stand, and an RJ45 ethernet cord. The equipment will arrive via 2-day UPS shipping, and tracking information will be provided to the customer via email.

<sup>18</sup> CenturyLink's Installation Guide provides further tips on installing Air-Line devices so as to maximize signal strength (e.g., recommending that Air-Line devices are installed close to exterior windows, at the highest floor of the premises, and away from possible obstructions). See CenturyLink's Air-Line Setup Guide, available here: <https://www.centurylink.com/home/help/home-phone/connected-voice/lte-home-phone/home-phone-setup.html>.

unbox the Air-Line adapter, set it up on the included vertical stand,<sup>19</sup> plug the device into a power outlet using the provided power cord, and plug their existing landline phone into the RJ11 Voice Output port on the Air-Line adapter. Customers can also connect the RJ11 Voice Output port on the Air-Line device to any wired phone jack in the home to feed voice service into the rest of their phone jacks. The Air-Line adapter has indicator lights that provide customers with real-time feedback about the strength of the 4G LTE network connection, allowing customers to test the strength of the network connectivity at various locations in their home and install the device in an area with the strongest network connection. Once set up, customers will be able to immediately start placing and receiving voice calls.<sup>20</sup> If customers have questions about the installation process, or need additional support, they can call in or chat with CenturyLink support for assistance. Customers that need additional support with their service can also review the “Troubleshooting” section of the Connected Voice with Air-Line Frequently Asked Questions on CenturyLink’s website.<sup>21</sup>

Connected Voice with Air-Line service customers are provided with CenturyLink’s Connected Voice Basic service package, which includes the following features: voicemail, call forwarding, caller ID, call waiting, 3-way calling, anonymous call blocking, simultaneous ring,

---

<sup>19</sup> An ideal location is an elevated and obstruction-free spot in the home near a window or exterior wall to maximize signal strength and coverage.

<sup>20</sup> Boot Up Lights on the Air-Line device will indicate the current state of the equipment to customers. During the hardware boot-up test, the light will be red. The light will stay blinking red if the hardware test fails. The light turns magenta during the software image boot test. The light will stay magenta if the software test fails. The light blinks green during boot-up after software and hardware tests. When the light is solid blue, the device is ready. The light will blink blue during the 4G LTE wide area network discovery process. When the light is solid green, customers will know that the device is connected.

<sup>21</sup> CenturyLink Connected Voice Troubleshooting Guide, available here: <https://www.centurylink.com/home/help/home-phone/connected-voice/lte-home-phone.html#troubleshooting>.

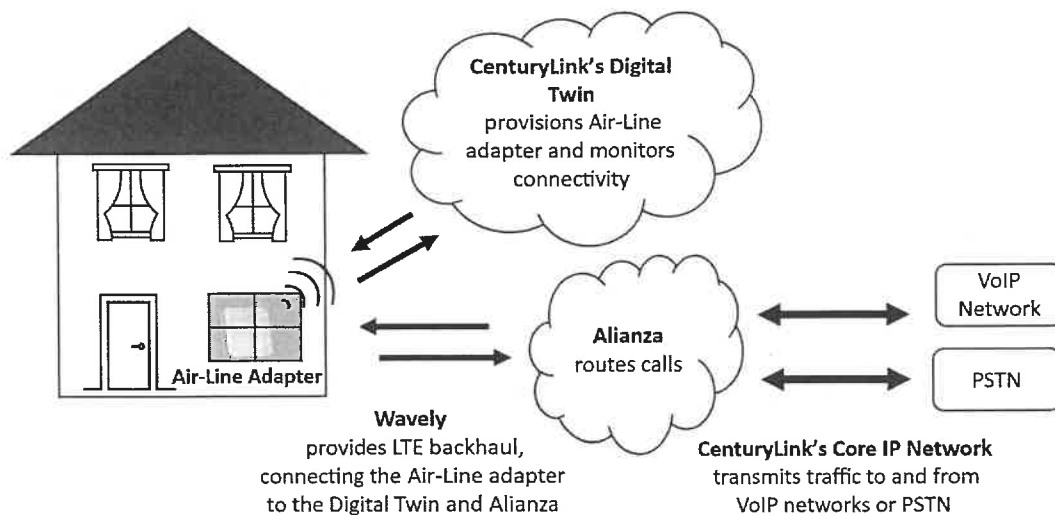
unlimited nationwide long-distance calling, 500 minutes a month of international calling to Canada, Mexico, the United Kingdom, Germany, and Ireland, and access to enhanced 911 calling.<sup>22</sup> Also included in the service are more advanced features not available with most traditional voice services, including voicemail to email and email notifications.

## **B. Network Architecture**

Connected Voice with Air-Line service is a VoIP service. It differs from traditional VoIP service in that the customer premise equipment (CPE) is the Air-Line adapter instead of a regular modem and the last mile connection is typically made by using LTE backhaul instead of fiber. But for these differences, the call processes and the network architecture are the same for a Connected Voice Basic service customer and a Connected Voice with Air-Line customer – calls are routed using Alianza’s cloud-based switching platform and then transmitted to and from the PSTN or VoIP networks using CenturyLink’s Core IP Network.

---

<sup>22</sup> Additional information about the voice features included in Connected Voice with Air-Line service is provided on CenturyLink’s website, here: <https://www.centurylink.com/home/help/home-phone/connected-voice/lte-home-phone.html#features>.



**Figure 1: CenturyLink's Connected Voice with Air-Line Network Architecture**

As shown in Figure 1, Connected Voice with Air-Line service establishes voice service using five basic components: (1) the Air-Line adapter, which is the CPE that customers can self-install in their home; (2) Wavely, which provides access to LTE backhaul; (3) the Digital Twin, which is CenturyLink's cloud-based software that remotely provisions the Air-Line device and monitors the connection between the Air-Line adapter, Wavely, and Alianza; (4) Alianza, a cloud-based switching platform that routes the calls to CenturyLink's Core IP Network; and (5) CenturyLink's Core IP Network, which transmits the voice traffic, whether for delivery to the PSTN or to a VoIP endpoint.<sup>23</sup> Additional details about each component are provided below.

*Air-Line Adapter.* This device converts analog voice signals from a traditional telephone to VoIP using the G.711 codec. The Air-Line adapter also converts analog signals from all

<sup>23</sup> If both endpoints of the call are managed by the Alianza platform, then the call will not be routed out onto CenturyLink's Core IP Network and will instead be routed directly to the endpoint.

TDM-based wireline devices included in the ART, such as fax machines and alarm systems, to IP using a cloud-based application software. The Air-Line adapter provides full access to E911, using the service address provided by the customer during the ordering process.<sup>24</sup> The Air-Line device transmits customer voice traffic either wirelessly, through 4G LTE networks, or through a high-speed internet connection, regardless of the provider.<sup>25</sup>

LTE Backhaul. Once turned on, a customer's Air-Line device automatically connects to the 4G LTE network with the strongest signal strength at that location. CenturyLink accesses 4G LTE networks through Wavely, a Virtual Mobile Network Operator with access to local and global mobile networks.<sup>26</sup> CenturyLink accesses Wavely's infrastructure through the Connectivity Management Platform, which enables network aggregation for CenturyLink customers. CenturyLink is responsible for the connectivity, *e.g.*, providing suitable hardware or communications equipment, providing all the infrastructure necessary to access the connection point, and maintaining that infrastructure.

Digital Twin. The Digital Twin is CenturyLink's central orchestrator engine for managing next-generation customer premises equipment. It is a centralized cloud-based platform, owned and operated by CenturyLink, that coordinates multiple components in a voice-enabled system to deliver seamless, low-latency, and intelligent interactions. It acts as the

---

<sup>24</sup> If customers move to a new residential location, they must contact CenturyLink to update their service location to ensure that emergency responders are sent the correct address. CenturyLink disclosed this requirement in the customer notification (Attachment D) mailed to each customer in the Affected Service Area. This information is also available on CenturyLink's website here: <https://www.centurylink.com/home/help/home-phone/connected-voice.html>.

<sup>25</sup> For the purposes of this application, CenturyLink assumes customers in the Affected Service Area will rely on the 4G LTE connectivity available to them for Connected Voice with Air-Line service, not a high-speed internet connection.

<sup>26</sup> Wavely's mobile network connectivity coverage spans more than 180 countries and more than 570 distinct networks. Wavely Connectivity, available here: <https://wavely.io/connectivity/>.

central control layer to manage data flows, device configurations, and service activations in real time. The Digital Twin remotely provisions each Air-Line device's settings at the initiation of service; stores information about customers service settings; and allows CenturyLink to monitor Air-Line devices to ensure that the device remains connected to the LTE backhaul through Wavely and to CenturyLink's Core IP Network through Alianza.

Alianza. Alianza provides Lumen with a VoIP platform for soft switching functionalities needed to route calls between endpoints without physical switching hardware. Put another way, Alianza virtually transitions Connected Voice with Air-Line traffic between different network paths without interrupting the ongoing communication session. Alianza routes Connected Voice with Air-Line service traffic over CenturyLink's Core IP Network.

CenturyLink's Core IP Network. CenturyLink Core IP Network is used to transmit Connected Voice traffic.<sup>27</sup> This robust network consists of a Multi-Protocol Label Switching backbone, which provides low latency and high reliability.<sup>28</sup>

*How it works.* After a customer receives the Air-Line adapter, installs it in their home, plugs in their phone, and turns the device on, the subsystems begin working together. When the customer first turns on the device, three processes happen simultaneously: (1) the Air-Line

---

<sup>27</sup> If both ends of the call are supported by Alianza's service, then the call is not sent over CenturyLink's Core IP Network to get to the terminating location but instead is routed directly to the terminating location via whatever last mile connectivity is used by that customer. For example, if the call is placed by one Connected Voice with Air-Line customer to another Connected Voice with Air-Line customer, then the call will be sent to Alianza via one 4G LTE Network, and routed by Alianza to the terminating location via, potentially, another 4G LTE Network. If the Connected Voice with Air-Line customer is calling a Connected Voice customer, then the call will be routed by Alianza to the terminating location via the customer's last-mile broadband connectivity (which is presumably fiber).

<sup>28</sup> See CenturyLink's Nationwide Network Map, available here: <https://www.lumen.com/networx/about/network-architecture/network-map.html>.

adapter connects to Wavely using LTE backhaul to alert Wavely that the service is active; (2) the Digital Twin pushes the Air-Line device settings, which were pre-provisioned in the cloud when the customer ordered service, to the Air-Line adapter; and (3) the Air-Line adapter alerts Alianza that the customer's Air-Line device is operational. Once these steps are completed, the service becomes active, meaning that the customers are connected to voice service and able to place and receive calls.

When the Air-Line device is first turned on, it is in "cold standby" mode, meaning that it is connected to the strongest LTE backhaul available at that location, but it isn't allowed to pass traffic through the network yet. Wavely then checks its eID database to see if it should allow the device to connect based on its SIM card/device ID. After confirming the device's eID in its database, Wavely allows the Air-Line device to talk to the Digital Twin, which onboards the Air-Line device. "Onboarding" means that the Digital Twin transmits to the Air-Line device information about the Account ID, Location ID, Service Configuration (*i.e.*, SIP voice settings), and the serial number claimed to the location ID. That information is relayed to Alianza to register the device and initiate the voice service.

After the service is active, the voice traffic travels from the Air-Line device using LTE backhaul provided by Wavely and is then routed by Alianza through CenturyLink's Core IP Network to call termination point, whether on the PSTN or on other VoIP infrastructure.

### **C. Performance Testing**

As noted earlier in this application, Connected Voice with Air-Line service is simply a new version of CenturyLink's Connected Voice service, a VoIP alternative that CenturyLink has successfully deployed to residential customers nationwide for years. Accordingly, when CenturyLink began internal testing for Connected Voice with Air-Line service, its engineers



initially focused on ensuring the functionality of the Air-Line adapter because it was the only untested portion of the service – 4G LTE providers regularly test their networks to ensure ongoing functionality and CenturyLink has existing safeguards in place to ensure its Connected Voice service remains functional.

Thus, CenturyLink's routine network testing began by determining whether the Air-Line adapter was ready to be deployed to customers. CenturyLink engineers had the Air-Line adapter manufacturer provide them with production hardware, *i.e.*, the actual devices that were going to be deployed in the field, for their testing. CenturyLink received 80 devices and provisioned them using the Digital Twin. The ongoing functionality of the Digital Twin is essential to providing Connected Voice with Air-Line service, so CenturyLink confirmed that the devices could consistently maintain connections to the Digital Twin and that all settings configured in the Digital Twin were being appropriately applied to the device as well as being accurately transmitted to both Wavely and Alianza from the Air-Line device.

After CenturyLink confirmed that the Air-Line adapters were connecting to the system components correctly, it began running test calls, working through a list of required Connected Voice call features. The list of call features is attached to this application (Attachment C). Through this testing, CenturyLink confirmed that all call features were functional while using Connected Voice with Air-Line service. Next, CenturyLink tested the failover process between LTE connectivity and ethernet as well as the failover process between different LTE networks. After the team was satisfied that the Air-Line adapter worked as it was engineered to, CenturyLink began deploying Connected Voice with Air-Line service to a limited pool of customers to confirm that its service was as functional in the field as it was in the lab. The limited pool of customers included two groups: (1) a pilot program for customers in Minnesota

(Minnesota Pilot), and (2) an internal trial program in which CenturyLink employees were offered the Connected Voice with Air-Line service (Centercode Trial).

In the Minnesota Pilot, CenturyLink offered Connected Voice with Air-Line service to approximately 200 customers in the Minneapolis/St. Paul, Minnesota service area whose service was impacted by copper theft. Eighteen customers participated, and all the Minnesota Pilot participants relied solely on LTE backhaul for Connected Voice with Air-Line service.<sup>29</sup> As of November 13, 2025, CenturyLink did not receive any formal complaints from customers, but there were three Minnesota Pilot participants that reached out to CenturyLink with issues that were quickly resolved.<sup>30</sup> There were no customer complaints from Minnesota Pilot participants about service quality. In addition, CenturyLink engineers monitored the Minnesota Pilot Participants' Air-Line adapters for just under a month,<sup>31</sup> ensuring that the devices remained connected to all subsystems, *i.e.*, the Digital Twin, Wavely, and Alianza. CenturyLink also tested network latency daily, at various times, throughout that timeframe to confirm that customers received the same quality of voice service that they received from legacy voice

---

<sup>29</sup> According to the FCC's National Broadband Map, all Pilot customers had access to AT&T, Verizon, and T-Mobile 4G LTE service.

<sup>30</sup> Two of the customers reported being erroneously charged 98 cents. The charge error was explained and resolved by CenturyLink customer service representatives. The remaining issues, and CenturyLink's resolutions to these issues, were as follows: (1) the incorrect technician was assigned and there was a misconfiguration in Alianza – CenturyLink assigned the correct technician, fixed the misconfiguration in Alianza, and device delivery and activation were confirmed; (2) an error occurred when creating the order and the service did not work due to an unassigned number destination – CenturyLink resolved the order creation error, reassigned the number destination, and confirmed the service to be working; (3) the automation script for the Digital Twin did not work because the device was not registered in the Alianza portal – CenturyLink shipped a new device to the customer and, after it was set up, service was confirmed.

<sup>31</sup> March 17, 2025, through April 14, 2025.

service. As of November 11, 2025, all 18 customers that subscribed to Connected Voice with Air-Line service during the Minnesota Pilot continue to subscribe to this service.

The Centercode Trial was established to validate the customer experience, technical reliability, and operational readiness of the Connected Voice Basic service paired with the Air-Line adapter. The Centercode Trial ran from July 19, 2025, through September 11, 2025, and had 22 participants. The Centercode Trial helped streamline and validate customer service processing, including identifying a handful of administrative issues, such as the call routing for ordering going to the wrong customer service representatives, inactive codes to activate call waiting during outbound calls, and text confirmations lacking the link to complete the order. These issues have since been resolved. When asked for feedback, customers said that they were pleased with the familiar dial tone provided through Connected Voice with Air-Line service, which is reminiscent of traditional copper lines and a feature not offered by some other VoIP providers. Customers also found that the Connected Voice with Air-Line service was extremely easy to set up and use, and the equipment return instructions were easy to follow. Customers within the trial rated outbound calling with 5 out of 5 possible stars and inbound calling with 4.5 of 5 possible stars.

The Minnesota Pilot and the Centercode Trial demonstrated that Connected Voice with Air-Line service reliably functions outside of the lab environment. CenturyLink received no complaints about network performance or service quality (beyond the now-resolved issue of the functionality of call waiting during outbound calls).

Under the ART, the Commission requires evidence showing, under the totality of the circumstances, that the replacement service provides substantially similar performance and availability as the service being discontinued. This evidence can come from testing that does not

conform with the parameters outlined in the *2016 Technology Transitions Order's* Technical Appendix – for example, results of internal network testing undertaken to measure performance in rolling out a new product or service. The Commission identified two key components of network performance – latency and data loss – that must be substantially similar to that of a legacy voice service.

To meet this requirement, CenturyLink conducted testing of both latency and data loss. The Commission stated in the *2016 Technology Transitions Order* that service providers should measure network latency, which is the time it takes for a data packet to travel from one point to another in a network.<sup>32</sup> Although the Commission set a measured network round-trip latency target of 100 milliseconds for a replacement service, it explained that this standard was designed to produce a user experience where the overall mouth-to-ear latency would be 200 milliseconds or less, after accommodating other sources of latency such as the required processing of the voice signal.<sup>33</sup> Accordingly, the Commission determined, evidence that a replacement service meets the underlying 200 millisecond mouth-to-ear latency standard for 95 percent of all testing would be compelling as a component of a totality of the circumstances showing.<sup>34</sup> In this regard, the Commission found it persuasive that the ITU Recommendations G.114 found that most users are “very satisfied” with VoIP service that has less than 200 millisecond mouth-to-ear-latency.<sup>35</sup>

---

<sup>32</sup> *2016 Technology Transitions Order* at ¶ 98 (latency measures the time it takes for a data packet to travel from one point to another in a network).

<sup>33</sup> *Id.* at ¶ 99 and n.265.

<sup>34</sup> *2016 Technology Transitions Order* at ¶ 99.

<sup>35</sup> *2016 Technology Transitions Order* at n.265; *Connect America Fund*, WC Docket No. 10-90, Report and Order, 28 FCC Rcd 15060, 15068-72, ¶¶ 19-24 (WCB 2013). *See also 2016 Technology Transitions Order* at n.258 (observing that users are satisfied with one-way mouth-to-ear latency of approximately 280 milliseconds or less).

Latency. CenturyLink's testing aimed to confirm that users experience a mouth-to-ear latency within the Commission's standard of 200 milliseconds mouth-to-ear. To do so, CenturyLink employed the following methodology. First, CenturyLink tested a complete call in its lab, measuring the time for the tested sound wave to be transmitted through the phone to the Air-Line adapter and for the Air-Line adapter to transform that soundwave into transmittable traffic, transmit the traffic through the entire call path, and then be transformed back into a sound wave at the call termination point, a PSTN endpoint in another room in the same building. To isolate the portion of the overall mouth-to-ear latency contributed by call processing, *i.e.*, the time it takes for the analog voice signal to be transformed into data packets, CenturyLink analyzed the data transmission path, and then ran a ping test to the last responsive server prior to the Alianza platform; the result was 36 milliseconds of latency associated with call processing.<sup>36</sup>

Next, CenturyLink ran similar ping tests from field-deployed devices to measure the latency from each device to the last-pingable network device before the Alianza platform. CenturyLink conducted 1905 ping tests and sent 7620 packets at all times of day. After adding 36 milliseconds to account for the observed call processing latency, greater than 95 percent of tests had an overall imputed mouth-to-ear latency of 200 milliseconds or less. This result was

---

<sup>36</sup> This test results in an overestimation of the call processing because it attributes all delay to call processing, including network delay, beyond the latest pingable server. Accordingly, this methodology provides a conservative view; actual user-experienced latency would be less than the derived amounts. The total observed mouth-to-ear latency from this test was 117 milliseconds, well below the Commission's standard.

consistent with the ITU-T Recommendation G.114<sup>37</sup> and previous Commission decisions in the universal service context.<sup>38</sup>

Data Loss. CenturyLink used the ping tests conducted using field-deployed Air-Line devices to determine the data loss rate of voice calls using Connected Voice with Air-Line service.<sup>39</sup> Only three of the 7620 packets sent failed during the testing period, producing a data loss rate of just .00039%, which is far less than the *2016 Technology Transitions Order* benchmark of less than 1% packet loss for packet-based networks.<sup>40</sup>

---

<sup>37</sup> The ITU-T Recommendation G.114 states that, using the E-Model, one-way latency less than approximately 200 milliseconds will result in an R-factor of 990 or above, which is “users very satisfied.” See International Telecommunication Union, Series G: Transmission Systems and Media, Digital Systems and Networks, *International telephone connections and circuits – General recommendations on the transmission quality for an entire international telephone connection – One-way transmission time*, ITU-T Recommendation G.114, p. 3 (May 2003).

<sup>38</sup> See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, 3099, ¶ 28 (2016) (*Rate-of-Return Reform Order*) (adopting latency metrics for rate-of-return carriers electing model-based Connect America Fund support); see also Office of Engineering and Technology & Consumer and Governmental Affairs Bureau, FCC, *2015 Measuring Broadband America Fixed Broadband Report: A Report on Consumer Fixed Broadband Performance in the United States*, at 17 (2015), <http://data.fcc.gov/download/measuring-broadband-america/2015/2015-Fixed-Measuring-BroadbandAmerica-Report.pdf> (2015 *Measuring Broadband America Fixed Broadband Report*) (providing data that show ISPs meet latency target).

<sup>39</sup> In the *2016 Technology Transitions Order*’s Technical Appendix, the FCC stated that the latency testing can also be used as the data loss test when the number of successes and failures is tracked and reported. Technical Appendix at ¶ 16.

<sup>40</sup> *2016 Technology Transitions Order* at ¶ 100. Data loss is often referred to as the IP Packet Loss Ratio in IP networks and measures that ratio of total lost IP packet outcomes to total transmitted IP packets in the environment under review. Here, three packets failed, *i.e.*, had “lost IP packet outcomes” and there were 7620 total transmitted IP packets in the environment under review.

## **II. APPLICATION: CONNECTED VOICE WITH AIR-LINE SERVICE SATISFIES THE ADEQUATE REPLACEMENT TEST**

### **A. Regulatory Background**

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.<sup>41</sup> Under the ART, discontinuance applications involving a technology transition will be eligible for automatic grant if the applicant demonstrates that there are one or more adequate replacements for the legacy voice service being discontinued in the service area in question.<sup>42</sup> 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.”<sup>43</sup>

---

<sup>41</sup> See generally *2016 Technology Transitions Order*.

<sup>42</sup> *Id.* at ¶ 64.

<sup>43</sup> *2016 Technology Transitions Order* at ¶ 65. See also 47 CFR § 63.602.

As discussed further below, this application shows that, based on the totality of the circumstances, Connected Voice with Air-Line service meets those three criteria and is therefore eligible for automatic grant under the streamlined process set forth in Section 63.71(f).

**B. Connected Voice with Air-Line Service Satisfies Each Prong of the ART**

Earlier this year, the Wireline Competition Bureau clarified that, to demonstrate substantially similar levels of network infrastructure and service quality as the legacy service, applicants relying on the “totality of the circumstances” need not conduct the performance testing described in the *2016 Technology Transitions Order* and its Technical Appendix.<sup>44</sup> Instead, the applicant can show, under the totality of the circumstances, that the replacement service provides substantially similar performance and availability as the service being discontinued, “based on some other type of testing, for example, results of internal network testing routinely undertaken to measure performance in rolling out a new product or service.”<sup>45</sup>

When evaluating the totality of the circumstances, the Commission should consider that it has previously determined that (1) the individual services that make up Connected Voice with Air-Line service – 4G LTE networks and VoIP – are adequate replacements for legacy voice service, and (2) another LTE VoIP service, AT&T’s Phone-Advanced service, is an adequate replacement for legacy voice service. These findings reflect the Commission’s confidence in the capability of such services to effectively replace legacy voice service and should inform its assessment of whether CenturyLink’s Connected Voice with Air-Line service meets the same standard.

---

<sup>44</sup> *Technology Transitions*, GN Docket No. 13-5, Order on Clarification, DA 25-250 (WCB rel. Mar. 20, 2025) (*2025 Adequate Replacement Test Clarification Order*).

<sup>45</sup> *2016 Technology Transitions Order* at ¶ 9.



**C. Under the Totality of the Circumstances, Connected Voice with Air-Line Service Offers Substantially Similar Levels of Network Performance and Availability as the Affected Service and Is Available to All Customers in the Affected Service Area**

The first prong of the Adequate Replacement Test requires a showing that one or more replacement service(s) provides (a) substantially similar network performance as the service being discontinued; (b) substantially similar service availability as the service being discontinued; and (c) service coverage to the entire affected geographic service area.<sup>46</sup> This application shows that, based on the totality of circumstances, Connected Voice with Air-Line service satisfies each of these elements.

**D. Under the Totality of the Circumstances, Connected Voice with Air-Line Service Provides Substantially Similar Network Performance as Legacy Voice Service**

The first test of the above-referenced standard is met by demonstrating that “a service is performing adequately enough to serve as a replacement for a legacy TDM service.”<sup>47</sup> This can be achieved through one of two options: (1) conducting performance testing that demonstrates satisfaction of each of the benchmarks identified in the *2016 Technology Transitions Order*, or (2) demonstrating that, based on the totality of the circumstances, the replacement service is on a network that still provides substantially similar performance and availability.<sup>48</sup> Accordingly, applicants can either demonstrate that the replacement service meets the identified benchmarks or make a demonstration, based on the totality of the circumstances, that the replacement service provides similar performance and availability as the service being discontinued.<sup>49</sup> Earlier this

---

<sup>46</sup> *2016 Technology Transitions Order* at ¶ 89.

<sup>47</sup> *Id.* at ¶ 91.

<sup>48</sup> *2025 Adequate Replacement Test Clarification Order* at ¶ 4.

<sup>49</sup> *2016 Technology Transitions Order* at ¶ 91.

year, the Wireline Competition Bureau clarified that applicants relying on the “totality of the circumstances” need not conduct the performance testing described in the *2016 Technology Transitions Order* and its Technical Appendix to show that a service meets the network performance criteria.<sup>50</sup> Instead, the applicant can show that the replacement service provides substantially similar performance and availability as the service being discontinued, “based on some other type of testing, for example, results of internal network testing routinely undertaken to measure performance in rolling out a new product or service.”<sup>51</sup>

CenturyLink’s performance testing, which is described in detail above in the Connected Voice with Air-Line Service Performance Testing section, demonstrates that Connected Voice with Air-Line service offers substantially similar service to CenturyLink customers – voice calls had one-way, mouth-to-ear latency of less than 200 milliseconds in 95 percent of all tested calls and data loss was less than 1%.

**E. Under the Totality of the Circumstances, Connected Voice with Air-Line Service has Service Availability that is Similar to the Service Being Discontinued**

Connected Voice with Air-Line service satisfies the “service availability” sub-prong through a totality of the circumstances showing, as permitted by the *2016 Technology Transitions Order* and the *Adequate Replacement Test Clarification Order*.<sup>52</sup> The Commission adopted a service availability benchmark of 99.99 percent for the optional performance testing outlined in that order,<sup>53</sup> but allows applicants to make a demonstration, based on the totality of

---

<sup>50</sup> See *2025 Adequate Replacement Test Clarification Order*.

<sup>51</sup> *2016 Technology Transitions Order* at ¶ 9.

<sup>52</sup> *2016 Technology Transitions Order* at ¶ 94; *2025 Adequate Replacement Test Clarification Order* at ¶ 9.

<sup>53</sup> *2016 Technology Transitions Order* at ¶ 112.

the circumstances, that the replacement services provides similar availability as the service being discontinued.

To evaluate service availability, the Commission has stated that it would consider data on customer trouble reports, the average repair interval in responding to those reports, the number of lines in the service area, and the duration of the observation period to reach a representative measurement of a customer's ability to access their provider's network. The purpose of this evaluation is to ensure that the service is generally available for use, meaning that the service is "in a state to perform a required function at a given instant of time or at any instant of time within a given time interval, assuming that the external resources, if required, are provided."<sup>54</sup>

The Commission has already found that AT&T's AP-A service, which similarly relies on 4G LTE for the last mile connection,<sup>55</sup> and Verizon's 4G LTE voice service, a mobile wireless voice service, provide similar service availability as legacy voice service.<sup>56</sup> And the Commission has routinely found that VoIP service provides a similar service availability as legacy voice service. Connected Voice with Air-Line service is a VoIP service that relies on 4G LTE wireless service for the last mile connection to the customer home. Given that the FCC has already determined that a similar service, AT&T's AP-A, as well as the component services, VoIP and

---

<sup>54</sup> *Id.* at ¶ 113, n.302.2016.

<sup>55</sup> *Comments Invited on AT&T's Section 214 Application to Grandfather and Discontinue Legacy Voice Service as Part of a Technology Transition*, WC Docket No. 24-220, Public Notice, DA 24-1158 (WCB Nov. 20, 2024) (accepting AT&T's application for filing and establishing an automatic grant date of Dec. 21, 2024).

<sup>56</sup> *Comments Invited on CenturyLink's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, WC Docket No. 25-177, Public Notice, DA 25-431 (WCB May 20, 2025) (accepting CenturyLink's application for filing and establishing an automatic grant date of June 20, 2025).

4G LTE service, offer similar service availability, it should make the same determination for Connected Voice with Air-Line service as well.<sup>57</sup>

Even aside from this precedent, under the totality of the circumstances, there is no question Connected Voice with Air-Line service provides customers with availability similar to, if not better than, the service being discontinued. The legacy voice service being discontinued relies exclusively on a copper network for transmission. Connected Voice with Air-Line service offers customers multiple paths to access CenturyLink's network. In the event of a service outage or a connectivity issue with one provider's 4G LTE signal, the Air-Line adapter's automatic failover functionality switches the device to an alternate 4G LTE provider.<sup>58</sup> Because customers in the Affected Service Area have access to more than one 4G-LTE network, it is very likely that the service will be in a state to perform a required function at a given instant of time or at any instant of time within a given time interval – in contrast, if the copper network experiences an outage, there is no backup network available. Moreover, the wireless connectivity can reduce or eliminate downtime associated with hard-to-service POTS lines in the event of an outage.

The FCC's National Broadband Map shows that there are multiple nationwide wireless providers that offer coverage suitable to support voice service in the Affected Service Area –

---

<sup>57</sup> The *2016 Technology Transitions Order* affords applicants that had successful prior certifications to streamline future applications. *2016 Technology Transitions Order* at ¶ 83 (stating that “an application should be eligible for an automatic grant where a substantially similar showing made by that same applicant has satisfied our public interest considerations”). To reduce barriers to network improvements and minimize regulatory burdens, this grace should be extended to all applicants using substantially similar technologies, *e.g.*, all LTE VoIP services or mobile voice services should be considered adequate replacements for POTS service. Such services do not differ in any way relevant to the ART and commenters will still have the opportunity to rebut an applicant's planned discontinuance if expectations do not match reality.

<sup>58</sup> If the device needs to switch carriers while in a call, the call will terminate due to CenturyLink's network management and security practices.

AT&T, T-Mobile, and Verizon all provide 4G LTE and 5G-NR in the area.<sup>59</sup> As noted above, CenturyLink has access to more than one 4G LTE network. CenturyLink also independently confirmed, using a proprietary wireless signal strength analysis tool, that 4G LTE service suitable for the Connected Voice with Air-Line service is available at each customer location in the Affected Service Area.<sup>60</sup>

Additionally, once the connection is established, calls are unlikely to drop because little bandwidth is needed to maintain Connected Voice with Air-Line voice traffic – roughly 64 kbps. The limited bandwidth needed to transmit this voice traffic reduces the likelihood of call failure during peak hours or busy seasons.

These facts demonstrate, under the totality of the circumstances, that Connected Voice with Air-Line service provides a substantially similar service availability as the legacy voice service CenturyLink seeks to discontinue.

#### **F. Connected Voice with Air-Line Service Reaches the Entire Affected Service Area**

Under the final network infrastructure and service quality sub-prong of the ART, to be eligible for streamlined processing, “the applicant must demonstrate 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.”<sup>61</sup>

---

<sup>59</sup> See FCC, National Broadband Map, <https://broadbandmap.fcc.gov/home> (last visited Dec. 26, 2025).

<sup>60</sup> CenturyLink’s partner’s proprietary signal strength analysis tool uses data submitted to the Commission through the Broadband Data Collection to determine whether the signal strength of the 4G LTE network is strong enough at a specific location for the customer to receive service.

<sup>61</sup> *2016 Technology Transitions Order* at ¶ 123.

The FCC’s National Broadband Map and the coverage maps publicly provided by AT&T, T-Mobile, and Verizon show that 4G LTE service is available throughout the Affected Service Area.<sup>62</sup> All the addresses within the affected service area are within wireless providers’ reported outdoor stationary 5/1 Mbps 4G LTE coverage area or reported outdoor stationary 7/1 Mbps 5G-NR coverage area.<sup>63</sup> CenturyLink’s Connected Voice with Air-Line service can leverage more than one 4G LTE network, and, as noted in the section above, CenturyLink independently confirmed that there is adequate 4G LTE signal at each customers’ home address. Taken together, these facts support the conclusion that Connected Voice with Air-Line service reaches the entire geographic footprint of the service area subject to discontinuance.

**G. Connected Voice with Air-Line Service Offers Access to Critical Applications and Functionalities**

The second prong of the ART is whether the “replacement service offers access to critical applications and functionalities.”<sup>64</sup> A service satisfies this prong if the applicant certifies or shows that, under the totality of the circumstances, the “replacement service complies with regulations regarding availability and functionality of 911 service for consumers and public safety answering points (PSAPs), industry standards regarding communications security, and regulations governing compatibility with assistive technologies.”<sup>65</sup> Connected Voice with Air-Line service complies with all applicable regulations under this prong.

---

<sup>62</sup> See FCC, National Broadband Map, <https://broadbandmap.fcc.gov/home> (last visited Dec. 26, 2025). The FCC’s map demonstrates that 4G LTE service is available from AT&T, Verizon, and T-Mobile throughout the Affected Service Area.

<sup>63</sup> *Id.*

<sup>64</sup> *2016 Technology Transitions Order* at ¶ 126.

<sup>65</sup> *Id.*

## 1. 911 and Emergency Services

911 Accessibility and Location Accuracy. CenturyLink certifies that Connected Voice with Air-Line service complies with all applicable regulations regarding the availability and required functionality of 911 service.<sup>66</sup> Connected Voice with Air-Line service provides customers with a dispatchable address capability, which enables emergency responders to be dispatched directly to the correct location of the 911 call in an emergency.<sup>67</sup> Section I(C), Connected Voice with Air-Line Service Performance Testing, describes the testing used to confirm this compliance.

Residential Backup Power. Although service providers are no longer required to certify compliance with the backup power rule, the Air-Line adapter is compatible with an external 24-hour battery backup that enables voice services, including 911 services, when the power goes out, meaning that CenturyLink would meet this requirement if it still existed.<sup>68</sup> The battery backup is available for customers to purchase for \$40.

---

<sup>66</sup> *2016 Technology Transitions Order* at ¶ 128 and nn.339-42 (detailing the “rules governing: (i) 911 call delivery, service, and location; (ii) the capabilities and routing necessary for consumers’ continued access to 911 emergency service; and (iii) 911 calls to PSAPs or other appropriate local emergency authorities”) (footnote omitted).

<sup>67</sup> *Id.* ¶ 129 (providing that “in order to satisfy this prong of the adequate replacement test and thus remain eligible for automatic grant, the replacement service must offer a dispatchable address capability”). If a customer moves, they must update their service address with CenturyLink to ensure that the dispatchable address is updated to reflect the new location. This guidance is provided to customers on CenturyLink’s Connected Voice Frequently Asked Questions, available here: <https://www.centurylink.com/home/help/home-phone/connected-voice.html>. It was also disclosed to customers in the Affected Service Area through the customer notification, which is attached to this application as Attachment D.

<sup>68</sup> The Air-Line adapter’s battery backup fully complies with the Commission’s backup power requirements outlined in the *2016 Technology Transitions Order*, even though these requirements sunset on September 1, 2025. 47 CFR § 9.20(g). In the *2016 Technology Transitions Order*, the FCC stated that applicants seeking to discontinue a legacy line-powered service in favor of a newer service that lacks line-powering must certify or make a showing that at least one replacement service in the area complies with its residential backup power

Protecting PSAP Operations. To successfully meet the second prong of the ART, an applicant can certify or show compliance with 911 network reliability requirements.<sup>69</sup>

CenturyLink hereby certifies that Connected Voice with Air-Line service complies with all applicable 911 network reliability requirements.<sup>70</sup>

## **2. 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.<sup>71</sup> If an applicant's network security management practices are enterprise-wide, *i.e.*, the enterprise safeguards without differentiation between services, geographic areas, or service-providing affiliates, a certification to that effect will be sufficient to demonstrate that the replacement service offers comparably effective protection from network security risks.<sup>72</sup> If relying on a third-party service, an applicant "must exercise reasonable diligence to identify the security

---

requirements, citing Section 12.5 of the Commission's rules. *2016 Technology Transitions Order* at ¶¶ 130-33. In 2019, the Commission moved 911 resiliency, redundancy, and reliability requirements (part 12) to subpart H of part 9. *Implementing Kari's Law and Section 506 of RAY BAUM'S Act, Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket Nos. 18-261 and 17-239, 34 FCC Rcd 6607 (2019). These rules were then sunset on September 1, 2025. *See Ensuring Continuity of 911 Communications*, Report and Order, 30 FCC Rcd 8677, 8716, ¶ 91 (2015).

<sup>69</sup> *See 2016 Technology Transitions Order* at ¶ 134.

<sup>70</sup> *See* 47 CFR § 9.19 (outlining requirements for the "reliability of covered 911 service providers").

<sup>71</sup> *2016 Technology Transitions Order* at ¶¶ 136 & 139 ("If relying on its own service, the applicant must demonstrate that the replacement service offers comparably effective protection from network security risks to remain eligible for automatic grant").

<sup>72</sup> *2016 Technology Transitions Order* at ¶ 139.



profile . . . of the replacement service, based on the replacement technology's ability to provide availability, integrity, and confidentiality.”<sup>73</sup>

Although Connected Voice with Air-Line service is CenturyLink's own product, it relies in part on third-party services, specifically, access to 4G LTE backhaul. Accordingly, to satisfy the network security management practices requirement for automatic grant, CenturyLink provides the following:

- (1) A certification of CenturyLink's enterprise-wide network security management practices,<sup>74</sup> and
- (2) The security profiles of all nationwide 4G LTE providers in Kenansville, Florida.

*Lumen's Enterprise-Wide Network Security Management Practices.* CenturyLink employs a comprehensive, enterprise-wide cybersecurity program designed to ensure robust network security and protect customer communication traffic through administrative, technical, and physical safeguards. CenturyLink implements operational best practices, administrative controls, and risk management frameworks to maintain our rigorous internal security standards. CenturyLink also conducts regular external audits to meet industry and regulatory compliance requirements.

CenturyLink's network security practices are built on a layered, proactive defense model that blocks malicious traffic at the network edge, tracks and neutralizes command-and-control

---

<sup>73</sup> 2016 *Technology Transitions Order* at ¶ 141.

<sup>74</sup> CenturyLink's enterprise-wide network security practices are imputed contractually to suppliers. Here, both Alianza's and Wavely's contracts contain a comprehensive Data Protection Addendum, which stipulates, among other things, that these entities will implement appropriate administrative, technical, organizational, and physical controls to ensure that processing of customer information complies with all requirements under applicable privacy laws and is protected against accidental or unlawful processing, destruction, loss, alteration, unauthorized disclosure of, or access.

threats, and leverages its expansive visibility from one of the world's most deeply peered networks. These practices align with the National Institute of Standards and Technology Cybersecurity Framework. Additionally, CenturyLink uses its Black Lotus Labs threat intelligence to secure customer applications and data with integrated cybersecurity solutions. Black Lotus Labs is the threat research and operations arm of CenturyLink that leverages its unmatched network visibility to protect CenturyLink customers. CenturyLink's enterprise-wide program incorporates robust policies, strategic planning, cutting edge technology, comprehensive training, and a culture of continuous improvement to proactively identify and protect against cybersecurity risks, and to enable rapid detection, response, and recovery from incidents.

CenturyLink continuously strives to implement a world-class security and risk management program and maintains security processes and industry accepted standards, regulations and certifications that protect its customers, products, and data. CenturyLink maintains a suite of the latest industry standards that ensures compliance and security are built into all of its products and services. CenturyLink trains and provides core security awareness that encourages its employees to act in the best defense of any CenturyLink cybersecurity risks. CenturyLink's cybersecurity ecosystem reflects its commitment to providing effective protection against cyber threats and will be reviewed with key stakeholders at least annually to ensure alignment with current regulations and business practices.

*Security Profile of Third-Party Providers.* According to the FCC's National Broadband Map, there are three nationwide 4G LTE providers in Kenansville, Florida – AT&T, T-Mobile, and Verizon. All of these providers offer comparable effective protection from network security risk as legacy voice service. The FCC previously approved AT&T's discontinuance application based on the availability of its AT&T Phone-Advanced service and Qwest Corporation's

discontinuance application based on the availability of Verizon's 4G LTE service. Both applications contained certifications regarding the entities' enterprise-wide network security practices. By approving these applications, the Commission found that AT&T and Verizon's network security management practices offer comparably effective protection from network security risks as legacy voice service. AT&T and Verizon also have comprehensive security profiles available online.<sup>75</sup>

T-Mobile's network security practices are similarly robust. Its comprehensive security profile is outlined on T-Mobile's Trust Center webpage.<sup>76</sup> T-Mobile employs enterprise-wide network security practices and has committed to maintaining the highest standards of cybersecurity as well as continuing to invest in and enhance its measures to safeguard its technologies, processes, systems, and teams.<sup>77</sup>

### **3. Services for Individuals with Disabilities**

The last element of the "critical applications" prong of the ART requires applicants to show or certify that a replacement service "complies with the Commission's applicable accessibility, usability, and compatibility requirements governing services benefiting individuals with disabilities."<sup>78</sup> Connected Voice with Air-Line service was designed to meet or surpass applicable criteria concerning accessibility, usability, and compatibility for services benefiting

---

<sup>75</sup> See Cybersecurity, AT&T (last visited Nov. 4, 2025) <https://sustainability.att.com/priority-topics/cybersecurity>; Verizon Security Summary (last visited Nov. 4, 2025) <https://www.verizon.com/about/privacy/verizon-security-summary?msockid=369323c1c3b86e2021a93553c2aa6fe3>.

<sup>76</sup> See T-Mobile Trust Center (last visited Nov. 4, 2025) <https://security.t-mobile.com/>.

<sup>77</sup> *Id.*

<sup>78</sup> *2016 Technology Transitions Order* ¶ 146 and n.386 (pointing to rules outlined in 47 CFR §§ 6.1-6.11, 7.1-7.11, 14.1-14.21, 14.60-14.61).

individuals with disabilities, such as telephone relay services. As noted in Section I(C) above, CenturyLink tested Connected Voice with Air-Line service to ensure its compatibility with standard phone service, which includes services and applications for individuals with disabilities. CenturyLink certifies that Connected Voice with Air-Line service complies with all accessibility, usability, and compatibility requirements governing services benefiting individuals with disabilities.

**H. Connected Voice with Air-Line Service Is Interoperable with Critical Applications and Functionalities That are Key to Consumers and Competitors**

The third prong of the ART is whether a replacement service offers compatibility with an enumerated set of applications and functionalities, comprising the following low-speed modem services: “fax machines, home security alarms, medical monitoring devices, analog-only caption telephone sets, and point-of-sale terminals.”<sup>79</sup> CenturyLink certifies that Connected Voice with Air-Line service is fully interoperable with the foregoing applications and functionalities, which “function or perform in a substantially similar manner” as they do on the Affected Service.<sup>80</sup> As noted in Section I(C) above, CenturyLink tested Connected Voice with Air-Line service to ensure its compatibility with such applications and functionalities.<sup>81</sup>

**III. ADDITIONAL INFORMATION REQUIRED BY 47 CFR §§ 63.71, 63.602, AND 63.505**

As required by Sections 63.71, 63.602, and 63.505 of the Commission’s rules, CenturyLink provides the following additional information:

---

<sup>79</sup> *2016 Technology Transitions Order* at ¶ 159.

<sup>80</sup> *Id.* at ¶ 168. As noted in Section I(C) above, CenturyLink ensured interoperability before deploying Connected Voice with Air-Line service in its Minnesota Pilot.

<sup>81</sup> *See* Attachment C.

**A. Name and Address of Carrier**

CenturyLink of Florida, Inc.  
100 CenturyLink Drive  
Monroe, Louisiana 71203

**B. Date of Planned Service Discontinuance**

As of March 31, 2026, or as soon thereafter as the necessary regulatory approvals can be obtained, CenturyLink will no longer offer the Affected Service in the Affected Service Area.

**C. Points of Geographic Areas of Service Affected and Description of Affected Service Area**

CenturyLink seeks authorization to discontinue the Affected Service in a portion of Kenansville, Florida. Specifically, CenturyLink plans to discontinue legacy voice service to the service locations in the area shown in Attachment A that are served or potentially could be served by CenturyLink.<sup>82</sup> The network infrastructure that CenturyLink seeks to discontinue passes 249 known living units, and six (6) customers currently subscribe to CenturyLink's legacy voice service in the Affected Service Area.<sup>83</sup>

**D. Brief Description of Type of Service Affected**

The Affected Service is a TDM-based voice service that provides voice-grade telephonic communications channels that can be used by residential or business subscribers to place or receive one call at a time.

---

<sup>82</sup> See Attachment A. Attachment B provides a list of the affected Census Blocks in the Affected Service Area.

<sup>83</sup> It is possible that there are service locations in the Affected Service Area that are not known to CenturyLink and, thus, are not in its network and operating systems. CenturyLink is aware only of locations at which it has provided service, or which are included in various system updates obtained from third-party sources in the ordinary course of business.

**E. Brief Description of Dates and Method of Notice to All Affected Customers**

CenturyLink sent written notification of the planned discontinuance to all customers in the Affected Service Area.<sup>84</sup> Customer notifications were sent by United Parcel Service or U.S. Mail on January 5, 2026. A copy of the customer notification letter CenturyLink mailed to its customers in the Affected Service Area is attached to this application (Attachment D).

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. There are no federally recognized Tribal Nations with Tribal lands in the Affected Service Area.

**F. Regulatory Classification of Carrier**

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

**G. Statement Identifying the Application as a Technology Transition**

The proposed discontinuance constitutes a “technology transition,”<sup>85</sup> because CenturyLink’s remaining legacy voice customers in the Affected Service Area 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.

---

<sup>84</sup> Customers were also sent a letter that provides an overview of Connected Voice with Air-Line service on September 18, 2025. A copy of that letter is attached to this application (Attachment E).

<sup>85</sup> See 47 CFR § 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”).

**H. Information Regarding the Price of the Service for Which Discontinuance Authority Is Sought and the Price of the Proposed Replacement Service**

CenturyLink's residential single-line voice service in the Affected Service Area is \$36 per month, plus taxes, surcharges, and fees. Business single-line voice service in the Affected Service Area is \$65 per month, plus taxes, surcharges, and fees. Long distance and additional calling features are available for an additional monthly charge. Customers in the Affected Service Area currently pay, on average, \$82.43 a month (with taxes, surcharges, and fees and the cost of add-ons) for legacy voice service.

Connected Voice with Air-Line service is available for \$30 per month per line, plus taxes, surcharges, and fees.<sup>86</sup> This service includes caller ID, call waiting, voicemail, anonymous call block, voicemail to email, email notifications, unlimited long distance calling in the U.S. and its territories, and 500 direct-dial international minutes each month to Canada, Germany, Ireland, Mexico, and the United Kingdom. CenturyLink leases the Air-Line adapter to customers for \$0 per month.

**I. Certification that the Information Submitted in this Application Is True and Accurate**

See attached certification from Clint Ferguson, Vice President Network Implementation and Field Operations.

**J. Applicable Tariff Listing**

Connected Voice with Air-Line service is not a tariffed service. As set forth above, Connected Voice with Air-Line service is available for \$30 per month, plus taxes, surcharges, and fees.

---

<sup>86</sup> This pricing applies to pre-paid service.

**K. Name of any other carrier or carriers providing telephone service to the community**

No other providers offer legacy TDM-based voice service in the Affected Service Area.

**L. Description of any Previous Discontinuance, Reduction, or Impairment of Service to the Community Affected by the Application**

CenturyLink does not have any plans for future discontinuance, reduction, or impairment of the service in the Affected Service Area.

**M. Number of Toll Messages**

CenturyLink's toll traffic to and from the Affected Service Area has steadily fallen with the dwindling number of legacy voice customers in the Affected Service Area and surrounding areas and the common use of mobile wireless services for long distance calling. CenturyLink does not track the monthly number of toll messages or toll revenues in this area.

\*\*\*

Questions about this application may be directed to Stephanie E. Minnock, Lumen Technologies, Inc., Assistant General Counsel, 660 North Capitol Street NW, Suite 240, Washington, D.C., 20001, (202) 519-2899.

**IV. CONCLUSION**

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 replacement services, which are readily available from CenturyLink or other providers. CenturyLink therefore respectfully requests that the Commission approve this Section 63.71 application.

Respectfully submitted,

**CENTURYLINK OF FLORIDA, INC.**

By: /s/ Stephanie Minnock  
Stephanie E. Minnock  
Lumen Technologies, Inc.  
660 North Capitol Street, NW  
Suite 240  
Washington, DC 20001  
(202) 519-2899  
stephanie.minnock@lumen.com

Its Attorney

**DATE:** January 7, 2026

### Section 63.602(a)(4) Certification

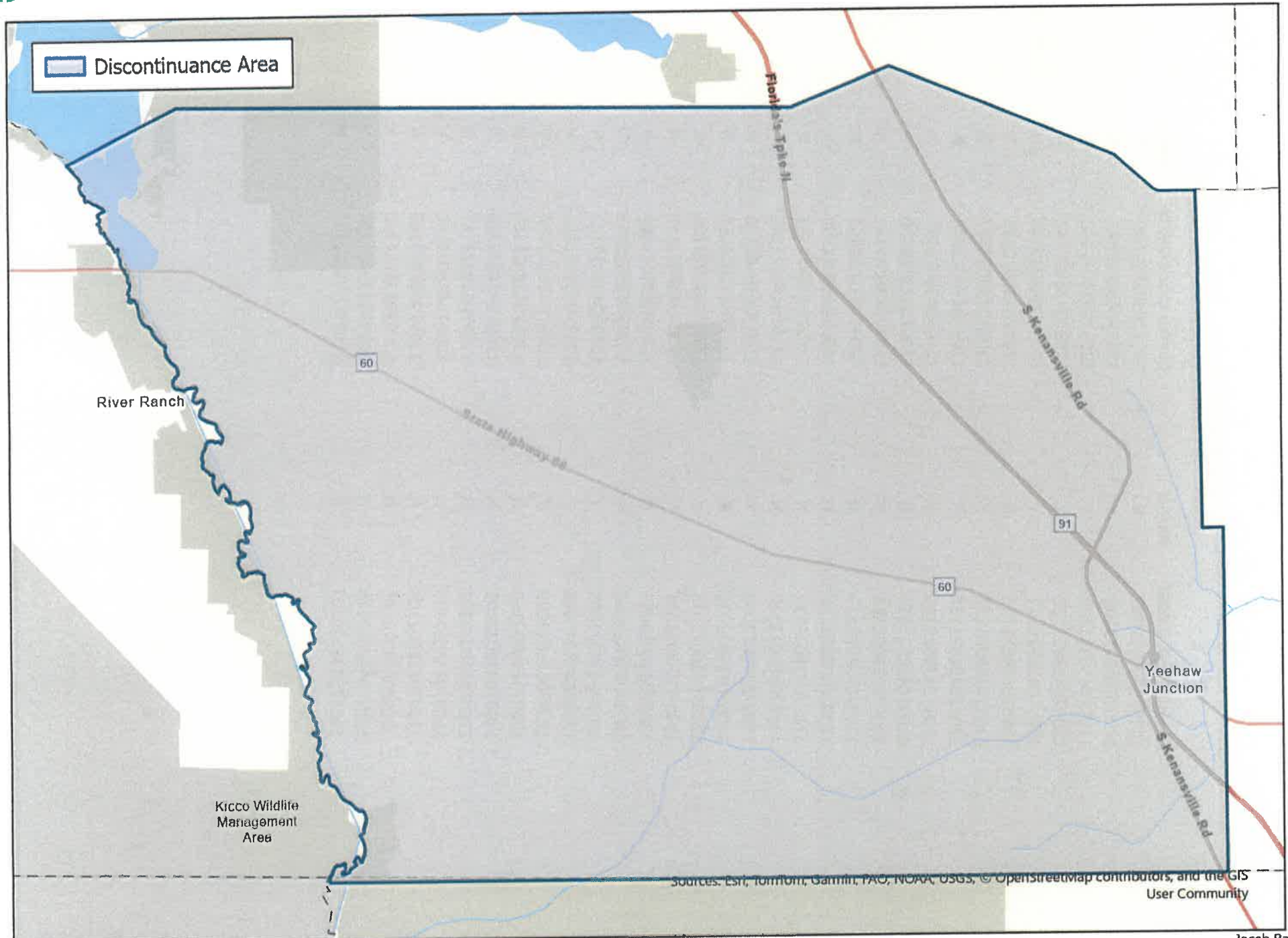
I, Clint Ferguson, certify under penalty of perjury that, to the best of my knowledge, information, and belief, the information required by 47 C.F.R. § 63.602 that is submitted in the Section 63.71 Application of CenturyLink of Florida, Inc. for Authority Pursuant to Section 214 of the Communications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

Clint A. Ferguson  
Clint Ferguson, Vice President  
Network Implementation and Field Operations

01/07/2025  
Date



# CenturyLink® Kenansville, FL (KNVLFLXA) Discontinuance ATTACHMENT A



# ATTACHMENT B

Census Block (2020)	Partial	Census Block (2020)	Partial
120559801001000	N	120970438022140	N
120970438021108	Y	120970438022141	N
120970438021109	Y	120970438022142	N
120970438021110	Y	120970438022143	N
120970438021111	Y	120970438022144	N
120970438021112	N	120970438022145	N
120970438021113	N	120970438022147	N
120970438021114	N	120970438022148	N
120970438021115	N	120970438022149	N
120970438021116	N	120970438022150	N
120970438021118	N	120970438022151	N
120970438021119	N	120970438022152	N
120970438021120	N	120970438022153	N
120970438021121	N	120970438022154	N
120970438021122	N	120970438022155	N
120970438022033	Y	120970438022156	N
120970438022036	N	120970438022157	N
120970438022053	Y	120970438022158	N
120970438022056	Y	120970438022159	N
120970438022057	N	120970438022160	N
120970438022058	Y	120970438022161	N
120970438022093	Y	120970438022162	N
120970438022098	Y	120970438022163	N
120970438022099	Y	120970438022164	N
120970438022100	N	120970438022165	N
120970438022101	N	120970438022166	N
120970438022102	N	120970438022167	N
120970438022103	N	120970438022168	N
120970438022104	N	120970438022169	N
120970438022105	N	120970438022170	Y
120970438022106	N	120970438022171	N
120970438022107	N	120970438022178	N

Census Block (2020)	Partial	Census Block (2020)	Partial
120970438022108	N	120970438022179	N
120970438022109	N	120970438022180	N
120970438022110	N	120970438022181	N
120970438022111	N	120970438023156	Y
120970438022112	N	120970438023157	Y
120970438022113	N	120970438023168	N
120970438022114	N	120970438023169	N
120970438022115	N	120970438023170	N
120970438022116	N	120970438023171	N
120970438022117	N	120970438023172	N
120970438022118	N	120970438023180	N
120970438022119	N	120970438023181	N
120970438022120	N	120970438023182	N
120970438022121	N	120970438023183	N
120970438022122	N	120970438023184	N
120970438022123	N	120970438023185	N
120970438022124	N	120970438023186	N
120970438022125	N	120970438023187	N
120970438022126	N	120970438023188	N
120970438022127	N	120970438023189	N
120970438022128	N	120970438023190	N
120970438022129	N	120970438023191	N
120970438022130	N	120970438023192	N
120970438022131	N	120970438023193	N
120970438022132	N	120970438023194	N
120970438022133	N	120970438023195	N
120970438022134	N	120970438023196	N
120970438022135	N	121050157024040	N
120970438022136	N	121050157024043	N
120970438022137	N	121050157024078	N
120970438022138	N		
120970438022139	N		

## ATTACHMENT C

Test Case	Test Setup	
<b>Basic Call</b>		LTE
SIP to PSTN	Caller A (SIP) calls Callee B (PSTN)	Pass
PSTN to SIP	Caller A (PSTN) calls Callee B (SIP)	Pass
SIP to SIP	Caller A (SIP) calls Callee B (SIP)	Pass
SIP to PSTN (Long Distance)	Caller A (SIP) calls Callee B (PSTN)	Pass
PSTN to SIP (Long Distance)	Caller A (PSTN) calls Callee B (SIP)	Pass
SIP to SIP (Long Distance)	Caller A (SIP) calls Callee B (SIP)	Pass
<b>Voicemail</b>		
SIP to PSTN Voicemail	Caller A (SIP) calls Callee B (PSTN), Caller A (SIP) let's call go to voicemail	Pass
PSTN to SIP Voicemail	Caller A (PSTN) calls Callee B (SIP), Caller A (PSTN) let's call go to voicemail	Pass
SIP to SIP Voicemail	Caller A (SIP) calls Callee B (SIP), Caller A (SIP) let's call go to voicemail	Pass
<b>Call Waiting</b>		
Call Waiting A	Caller A (SIP) calls Callee B (PSTN), Caller C (SIP) calls Callee A (SIP), Caller A (SIP) flashes over to Caller C (SIP) and puts Caller B (PSTN) on hold.	Pass
Call Waiting B	Caller A (SIP) calls Callee B (PSTN), Caller C (SIP) calls Callee B (PSTN), Caller B (PSTN) flashes over to Caller C (SIP) and puts Caller A (SIP) on hold.	Pass
Call Waiting C	Caller A (PSTN) calls Callee B (SIP), Caller C (SIP) calls Callee A (PSTN), Caller A (PSTN) flashes over to Caller C (SIP) and puts Caller B (SIP) on hold.	Pass
Call Waiting D	Caller A (PSTN) calls Callee B (SIP), Caller C (SIP) calls Callee B (SIP), Caller A (PSTN) flashes over to Caller C (SIP) and puts Caller B (SIP) on hold.	Pass
Call Waiting E	Caller A (SIP) calls Callee B (SIP), Caller C (SIP) calls Callee A (SIP), Caller A (SIP) flashes over to Caller C (SIP) and puts Caller B (SIP) on hold.	Pass
Call Waiting F	Caller A (SIP) calls Callee B (SIP), Caller C (SIP) calls Callee B (SIP), Caller A (SIP) flashes over to Caller C (SIP) and puts Caller B (SIP) on hold.	Pass
Call Waiting G	Caller A (SIP) calls Callee B (PSTN), Caller C (PSTN) calls Callee A (SIP), Caller A (SIP) flashes over to Caller C (PSTN) and puts Caller B (PSTN) on hold.	Pass
Call Waiting H	Caller A (SIP) calls Callee B (PSTN), Caller C (PSTN) calls Callee B (PSTN), Caller A (SIP) flashes over to Caller C (PSTN) and puts Caller B (PSTN) on hold.	Pass
Call Waiting I	Caller A (PSTN) calls Callee B (SIP), Caller C (PSTN) calls Callee A (PSTN), Caller A (PSTN) flashes over to Caller C (PSTN) and puts Caller B (SIP) on hold.	Pass

Call Waiting J	Caller A (PSTN) calls Callee B (SIP), Caller C (PSTN) calls Callee B (SIP), Caller A (PSTN) flashes over to Caller C (PSTN) and puts Caller B (SIP) on hold.	Pass
Call Waiting K	Caller A (SIP) calls Callee B (SIP), Caller C (PSTN) calls Callee A (SIP), Caller A (SIP) flashes over to Caller C (PSTN) and puts Caller B (SIP) on hold.	Pass
Call Waiting L	Caller A (SIP) calls Callee B (SIP), Caller C (PSTN) calls Callee B (SIP), Caller A (SIP) flashes over to Caller C (PSTN) and puts Caller B (SIP) on hold.	Pass
<b>3-Way Conference</b>		
3-Way Conference A	Caller A (SIP) calls Callee B (PSTN), Caller C (SIP) calls Callee A (SIP), Caller A (SIP) forms 3-way Conference.	Pass
3-Way Conference B	Caller A (SIP) calls Callee B (PSTN), Caller C (SIP) calls Callee B (PSTN), Caller B (PSTN) forms 3-way Conference.	Pass
3-Way Conference C	Caller A (PSTN) calls Callee B (SIP), Caller C (SIP) calls Callee A (PSTN), Caller A (PSTN) forms 3-way Conference.	Pass
3-Way Conference D	Caller A (PSTN) calls Callee B (SIP), Caller C (SIP) calls Callee B (SIP), Caller B (SIP) forms 3-way Conference.	Pass
3-Way Conference E	Caller A (SIP) calls Callee B (SIP), Caller C (SIP) calls Callee A (SIP), Caller A (SIP) forms 3-way Conference.	Pass
3-Way Conference F	Caller A (SIP) calls Callee B (SIP), Caller C (SIP) calls Callee B (SIP), Caller B (SIP) forms 3-way Conference.	Pass
3-Way Conference G	Caller A (SIP) calls Callee B (PSTN), Caller C (PSTN) calls Callee A (SIP), Caller A (SIP) forms 3-way Conference.	Pass
3-Way Conference H	Caller A (SIP) calls Callee B (PSTN), Caller C (PSTN) calls Callee B (PSTN), Caller B (PSTN) forms 3-way Conference.	Pass
3-Way Conference I	Caller A (PSTN) calls Callee B (SIP), Caller C (PSTN) calls Callee A (PSTN), Caller A (PSTN) forms 3-way Conference.	Pass
3-Way Conference J	Caller A (PSTN) calls Callee B (SIP), Caller C (PSTN) calls Callee B (SIP), Caller B (SIP) forms 3-way Conference.	Pass
3-Way Conference K	Caller A (SIP) calls Callee B (SIP), Caller C (PSTN) calls Callee A (SIP), Caller A (SIP) forms 3-way Conference.	Pass
3-Way Conference L	Caller A (SIP) calls Callee B (SIP), Caller C (PSTN) calls Callee B (SIP), Caller B (SIP) forms 3-way Conference.	Pass

<b>Fax</b>		
SIP to PSTN Fax	Caller A (SIP) calls Callee B (PSTN), Caller A (SIP) accepts Fax	Pass
PSTN to SIP Fax	Caller A (PSTN) calls Callee B (SIP), Caller A (PSTN) accepts Fax	Pass
SIP to SIP Fax	Caller A (SIP) calls Callee B (SIP), Caller A (SIP) accepts Fax	Pass
<b>Interop Section</b>		
SIP to 911	Caller A (SIP) reaches emergency services	Pass
Rotary Phone	Caller A (SIP) uses rotary phone to Caller B (PSTN)	Pass
<b>Fail Over Section</b>		
LTE to ETH	Plug in ETH and make sure calls work / backhaul drops from LTE	Pass
ETH to LTE	Unplug ETH and make sure calls work / backhaul forms on LTE	Pass
<b>Star Code</b>		
Accept All Calls Enable	*64	Pass
Accept All Calls Disable	*74	Pass
Anonymous Call Rejection Enable	*77	Pass
Anonymous Call Rejection Disable	*87	Pass
Anonymous Call Reject with Intercept Enable	*95	Pass
Anonymous Call Reject with Intercept Disable	*99	Pass
Call Back (last Call Return)	*69	Pass
Call Forwarding All	*72	Pass
Call Forwarding on Busy	*90	Pass
Call Forwarding on No Answer	*92	Pass
Call Forwarding on Unregistered	*94	Pass
Call Trace	*57	Pass
Call Waiting Enable	*43	Pass
Call Waiting Disable	*44	Pass
Caller Block/Allow Enable	*59	Pass
Caller Block/Allow Disable	*60	Pass
Caller Block with Intercept	*58	Pass
Caller ID Block	*31	Pass
Caller ID Block (per call)	*67DN	Pass
Caller ID Un-Block (per call)	*82DN	Pass
Caller Forward	*63	Pass
Directed call Pick UP	**	Pass
Direct to Voicemail	*00	Pass
Do Not Disturb Enable	*96	Pass
Do Not Disturb Disable	*97	Pass
Dynamic Block List Enable	*60	Pass



Dynamic Block List Disable	*80	Pass
Group Pick Up	*40	Pass
Park Calls	*62	Pass
Park Call Retrieval	*66	Pass
Voicemail	*98	Pass

January 5, 2026



**Important update about your CenturyLink Home Phone Service**

Dear ,

We're upgrading our home phone service in your area from our legacy voice service to our new **CenturyLink® Connected Voice with Air-Line™** in Kenansville, Florida. Connected Voice with Air-Line delivers the reliability of a home phone backed by the power of today's tech – no internet connection needed.

**Connected Voice with Air-Line** offers all the features of traditional telephone like caller ID, call waiting, voicemail, etc., plus unlimited nationwide long distance and advanced features like voicemail to email and email notifications.

As part of this upgrade, the CenturyLink voice service you currently subscribe to, which provides you with voice-grade telephonic communications channels that can be used to place or receive one call at a time, will be discontinued on **March 31, 2026**, subject to the necessary regulatory approvals. See attached map for additional details about the impacted geographic area. We are committed to working with you to ensure that you can transition your home phone service without interruption.

**To keep your current home phone number and to ensure uninterrupted home phone service**, call us at **800-884-2000** Monday through Friday, 9:00 a.m. – 7:00 p.m. or Saturday, 10:00 a.m. – 8:00 p.m. CT and let the agent know you'd like to switch to Connected Voice with Air-Line. If you wish to transfer your service to another provider in your area, please contact your provider of choice directly.

Please contact Rick Gutierrez at 303-992-5828 if you have any questions or concerns about these changes.

We appreciate your business and look forward to continuing to serve you.

Sincerely,

**Clint Ferguson**  
**Vice President, Network Implementation and Field Operations**  
**CenturyLink**

**The following statement is required by FCC rules:**

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 CenturyLink of Florida, Inc. 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.

## Important Information Regarding Connected Voice with Air-Line

**Lack of Line Power.** Connected Voice with Air-Line does not provide line power. This means that the service will not work in the event of a power outage unless you have a battery backup.

### **Optional Backup Power.**

- Capability to accept backup power and availability of at least one backup power solution available directly from the provider. If there is an extended electrical power outage that affects your home, your service will still work if you are using a battery backup and the backup stays charged. You can purchase a battery backup from CenturyLink for \$40.
- Service limitations with and without backup power. Backup power for your Air-Line adapter will ensure that it remains operational during a power outage. To maintain phone service, use a corded phone that doesn't rely on AC power or a cordless phone that can be charged. Cordless handsets that require AC power to function will not be supported by the battery backup. Other services, such as security alarms, will not work if they do not have their own battery backup.
- Expected backup power duration. The battery backup should last at least 24 hours in standby mode.
- Proper usage and storage conditions. Ideally, backup batteries should be stored at room temperature, between 60- and 80-degrees Fahrenheit. Storage of a backup battery at much lower or higher temperatures may prevent you from using the battery to maintain phone service during a power outage.
- Subscriber backup power self-testing and monitoring instructions. We recommend that you check the battery backup at least twice a year to ensure it is operating and ready to use in case of a power outage.
- Backup power warranty details. You are responsible for obtaining, monitoring, replacing, and properly disposing of the battery backup and all batteries for it. Battery backup is not covered by the CenturyLink Inside Wiring Protection plan.

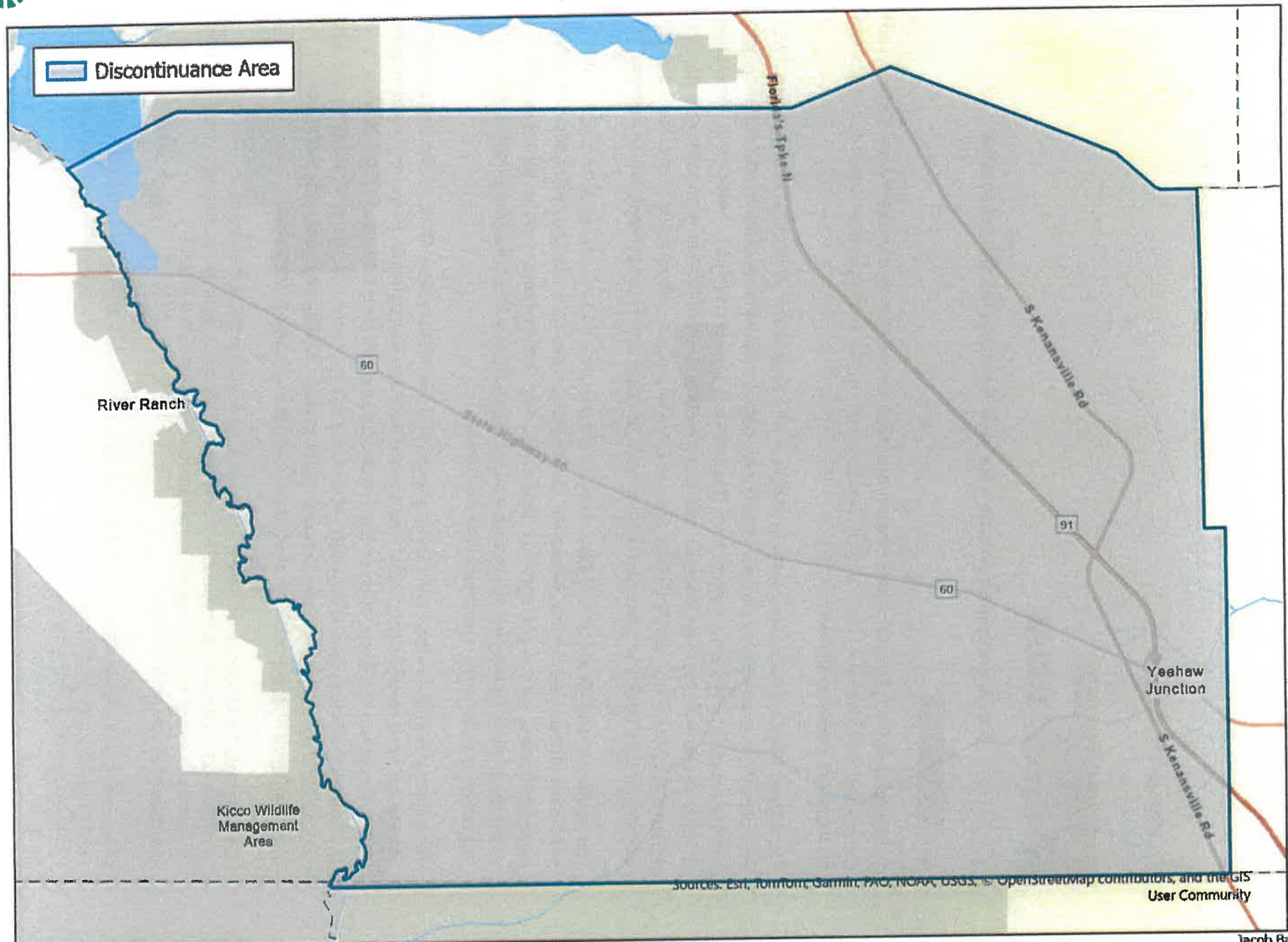
### **Security Responsibilities and Other Steps You May Take to Ensure Safe Use of**

**Connected Voice with Air-Line.** As noted above, in the event of an electrical power outage, Connected Voice with Air-Line will not operate without backup power, such as an external battery backup. Without sufficient power, you won't be able to place or receive any calls, including emergency 911 calls. With active batteries, a battery backup for your phone equipment will provide temporary power during an outage, which allows your phone service to continue functioning, including the ability to call 911.

If you plan to move, and need to change your service address, you will need to contact CenturyLink to ensure that 911 calls are properly routed. Do not move the Air-Line adapter installed in your home to another location without contacting CenturyLink.



# CenturyLink® Kenansville, FL (KNVLFLXA) Discontinuance





September 18, 2025



**A new enhanced solution for your CenturyLink phone service**

Dear 

CenturyLink recently introduced its latest and enhanced solution for phone service – CenturyLink® Connected Voice with Air-Line™ - which was designed to offer improved connectivity and reliability for local voice communications.

Connected Voice with Air-Line is now available in your area. It is a voice-only home phone service that uses Voice over Internet Protocol (VoIP) technology to provide local home phone functionality without requiring an internet connection. The service is provided with a compact analog telephone adapter called “Air-Line,” which works seamlessly with your standard home phone handset, whether corded or cordless. You don't need to buy a new phone, simply plug your current phone into the Air-Line device to make and receive calls, keeping your existing home phone number.

Connected Voice with Air-Line service provides crystal-clear call quality and essential features such as unlimited local calling, voicemail, call waiting, caller ID, and more, all for **\$30 a month** plus applicable taxes, surcharges, and fees. Developed with network performance, reliability, and coverage in mind, Connected Voice with Air-Line also supports 911 emergency calling and accessibility options for customers with disabilities.

Recognizing Florida's vulnerability to hurricanes and extreme weather, CenturyLink understands the critical need for uninterrupted phone service during power outages. That's why we offer options for backup power solutions, such as battery backup units, to help keep your phone service, including 911 access, operational even when the electricity goes out. While a battery backup unit is not included by default, our team is ready to assist you in finding one suited to your needs, providing extra peace of mind for customers living in hurricane-prone areas.

If you sign up for service, we'll ship you the Air-Line device at no additional cost. After it arrives, you'll simply plug the equipment into a power outlet and into your phone to begin making calls. Easy-to-use setup instructions are included in the box and are online at **[centurylink.com/airline-help](http://centurylink.com/airline-help)**.

Call us at **1-888-884-2000** Monday through Friday, 9:00 a.m. – 7:00 p.m. or Saturday, 10:00 a.m. – 8:00 p.m. (CT) and let the agent know you'd like to switch your local home phone voice service to Connected Voice with Air-Line.

## ATTACHMENT E

We look forward to helping you transition to a reliable home phone service built for the modern era.

Your CenturyLink Team

Limited availability. Service in select locations only. Available to qualifying customers only and requires qualifying cellular coverage. Limited time offer. Monthly service and phone line (if applicable) rates, equipment fees, and taxes and fees are subject to change and, if any changes are made to existing accounts in any manner, all prior discounts will be void. Customers who elect to receive a paper bill will be charged \$2 for each applicable monthly bill. Equipment: Service requires Air-Line leased equipment; self-installation of equipment required. Upon termination of service, Air-Line equipment must be returned to CenturyLink. Month to month (referred to as "no contract") service means no term commitment and may be cancelled at any time without an early termination fee but customer must accept Connected Voice Subscriber Agreement prior to using service (see [centurylink.com/legal/en/Connected\\_Voice\\_Subscriber\\_Agreement.html](http://centurylink.com/legal/en/Connected_Voice_Subscriber_Agreement.html)). See [centurylink.com/feesandtaxes](http://centurylink.com/feesandtaxes) for applicable taxes and fees. Additional restrictions may apply. Service includes Caller ID, Hold, Call Waiting, 3-way calling and Voicemail. Service excludes call center, data services, conference lines, directory and operator assistance, chat lines, pay-per-call, calling card use, 0+ dialing, and 3-digit dialing (other than 911, 711, 611 and 411), and Premium service. Prepayment: If prepayment is the payment method, service will begin on the date your order is completed and full payment is processed through your choice of bank account (via ACH payment), debit card, credit card, or other prepay service available with your subscription. Each month following, a recurring e-commerce transaction for your service will be processed as service automatically renews monthly until cancelled by customer.

## Important Information Regarding Connected Voice with Air-Line

**Lack of Line Power.** Connected Voice with Air-Line does not provide line power. This means that the service will not work in the event of a power outage unless you have a battery backup.

### **Optional Backup Power.**

- Capability to accept backup power and availability of at least one backup power solution available directly from the provider. If there is an extended electrical power outage that affects your home, your service will still work if you are using a battery backup and the backup stays charged. You can purchase a battery backup from CenturyLink for \$40.
- Service limitations with and without backup power. Backup power for your Air-Line adapter will ensure that your Air-Line adapter remains operational during a power outage. To maintain phone service, use a corded phone that doesn't rely on AC power or a cordless phone that can be charged. Cordless handsets that require AC power to function will not be supported by the battery backup. Other services, such as security alarms, will not work if they do not have their own battery backup.
- Expected backup power duration. The battery backup should last at least 24 hours in standby mode.
- Proper usage and storage conditions. Ideally, backup batteries should be stored at room temperature, between 60- and 80-degrees Fahrenheit. Storage of a backup battery at much lower or higher temperatures may prevent you from using the battery to maintain phone service during a power outage.
- Subscriber backup power self-testing and monitoring instructions. We recommend that you check the battery backup at least twice a year to ensure it is operating and ready to use in case of a power outage.
- Backup power warranty details. You are responsible for obtaining, monitoring, replacing, and properly disposing of the battery backup and all batteries for it. Battery backup is not covered by a CenturyLink Inside Wiring Protection plan.

### **Security Responsibilities and Other Steps You May Take to Ensure Safe Use of**

**Connected Voice with Air-Line.** As noted above, in the event of an electrical power outage, Connected Voice with Air-Line will not operate without backup power, such as an external battery backup. Without sufficient power, you won't be able to place or receive any calls, including emergency 911 calls. With active batteries, a battery backup for your phone equipment will provide temporary power during an outage, which allows your phone service to continue functioning, including the ability to call 911.

If you plan to move, and need to change your service address, you will need to contact CenturyLink to ensure that 911 calls are properly routed. Do not move the Air-Line adapter installed in your home to another location without contacting CenturyLink.



## 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, on the Governor of the State listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commission listed on the attached service list;<sup>1</sup>
- 4) Served via first-class U.S. Mail, postage prepaid, on the Special Assistant for Telecommunications under the Secretary of Defense.

/s/ *Marjorie Herlth*

Marjorie Herlth

January 7, 2026

---

<sup>1</sup> CenturyLink of Florida, Inc. did not identify any Tribal Nations in the geographic area covered by this Application.

Office of Governor  
The Capitol, PL05  
400 S. Monroe St.  
Tallahassee, FL 32399

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

Department of Defense  
Special Assistant for Telecommunications  
Pentagon  
Washington, DC 20301