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Via ECFS

February 25, 2020

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control;*
WC Docket No. 10-110

Dear Ms. Dortch:

In Appendix C of the Commission's March 18, 2011 Memorandum Opinion and Order in WC Docket No. 10-110, CenturyLink agreed that if it had plans to replace a Qwest Operational Support System (OSS) or integrate it with any other OSS, then at least 180 days before replacement or integration, CenturyLink would notify the FCC, affected states, and affected wholesale customers.¹ The proposed transition plan would be submitted to the Commission and the affected state regulators, and CenturyLink would seek input from affected wholesale local service customers on the plan. Attached is such a transition plan.

CenturyLink plans to consolidate Exchange Service (wholesale local service) ordering to streamline procedure and systems across CenturyLink's ILEC geography. As a result of the CenturyLink-Qwest merger, CenturyLink currently operates two separate and disparate systems

¹ See *In the Matter of Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer Control*, 26 FCC Rcd 4194, 4218, at Appendix C, WC Docket No. 10-110, FCC 11-47 (Rel. Mar. 18, 2011).

for the purchase of Exchange Services, including unbundled network elements and resale.² Each system is associated with delivery of service in a particular geography. As a result, wholesale customers who operate in multiple markets across CenturyLink's broad network currently must utilize both systems.

During 2020 CenturyLink seeks to transition all Local Service Request (LSR) order processing to its Electronic Administration & Service Order Exchange (EASE) system.³ The attached plan outlines CenturyLink's planned methodical migration of order processing off the Interconnect Mediated Access (IMA) system and onto the EASE system across all markets and geographies by October 16, 2020.

The benefits include:

- Single standardized order entry channel for Local Service Request submissions
- Standardized process for Local Service Request handling and fulfillment
- Single view of all pending Local Service Requests
- One set of training requirements

CenturyLink's plan includes contingency actions that would be executed if and when unforeseen problems are encountered during the transition. The plan was prepared by information technology professionals with substantial experience and knowledge regarding legacy CenturyLink and legacy Qwest systems, processes, and technical requirements. The plan brings CenturyLink systems into closer alignment with industry standards. CenturyLink wholesale local service customers (CLECs) have been given the opportunity to supply input to the plan via the CenturyLink Change Management Process. On January 23, 2020 the Plan was sent to representatives of 294 companies, each of whom is a CenturyLink wholesale local services customer. On January 22, 2020 the plan was shared with wholesale local service customers during a conference call attended by 43 representatives of 14 companies. In response to CenturyLink's request for input, one company subsequently supplied written feedback. CenturyLink is responding to that customer now. Interaction will be ongoing.

² The Commission has proposed to modify its unbundling rules for OSS. *See In the Matter of Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services*, WC Docket No. 19-308, Notice of Proposed Rulemaking, FCC 19-119, ¶¶ 83-85 (Nov. 25, 2019). Until those rules are modified, CenturyLink will continue to fully comply with the Commission's current OSS rules.

³ This proposed consolidation will have no impact on CenturyLink's OSS used to process Access Service Requests for Exchange Access services.

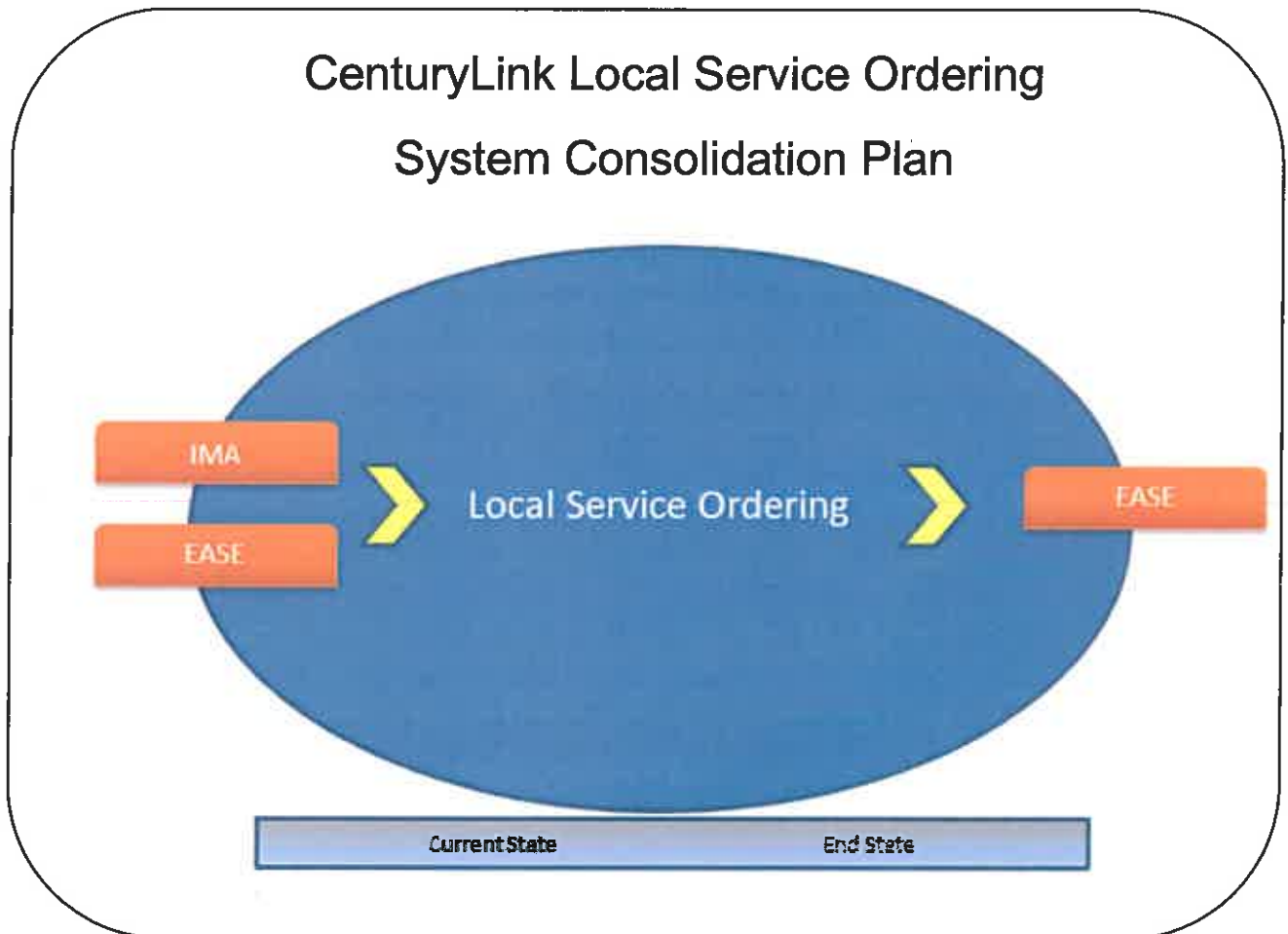
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CenturyLink is also providing this notice to representatives of state regulatory commissions in the impacted states. Please contact the undersigned with any questions regarding this notice.

Sincerely,

/s/ Randy Clarke
Randy Clarke

CenturyLink Local Service Ordering and Billing System Consolidation Plan



Version 3.0 09/10/19

Document Modification Log

All revisions to this document are in chronological order.

| Version | Date | Description of Change |
|---------|------|-----------------------|
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1 Executive Summary

CenturyLink is consolidating Local Service ordering to streamline procedure and systems across CenturyLink's markets (hereafter, Consolidation). Due to Acquisitions (see Section 1.3), CenturyLink currently operates two different ordering systems for purchase of Local Services. As a result, customers who operate in multiple locations within CenturyLink's network utilize both systems making this inefficient for the customer and for CenturyLink.

During Consolidation, CenturyLink will move all Local Service Request ordering to Electronic Administration & Service Order Exchange (EASE). (Refer to Section: 2:

Ordering and Billing System Description for more information.) This Consolidation will migrate ordering off the Interconnect Mediated Access (IMA) system and onto the EASE system across all markets and geographies.

The benefits are:

- Single standardized order entry channel for Local Service Request submission
- Standardized process for Local Service Request handling
- Single view of all Local Service Requests
- One set of training requirements

1.1 Scope

The CenturyLink Local Service Ordering System Consolidation Plan (hereafter; the Consolidation Plan) document provides CenturyLink's wholesale customers, (hereafter; Customers) with further information about the Consolidation and how they will be affected.

The purpose of this document is to cover the scope of the Consolidation Plan to fulfill specific requirements of settlement agreements with various parties, as well as associated state commission and FCC orders, related to the CenturyLink/Qwest merger (hereafter, Merger Requirements). This document summarizes the critical milestones that will occur when CenturyLink consolidates the Current State Ordering System into the End State solution. The Consolidation is planned to begin no earlier than April 2020

1.1.1 Items Not in Scope:

Items that are not in-scope for this project include, but are not limited to:

- Future system enhancements to EASE resulting from Local Service Ordering Guidelines (LSOG) updates beyond the upgrades specified in this project
- Merger of End State Billing Systems.

1.2 Assumptions

The following is a list of assumptions that are applicable during implementation and upon completion of the Consolidation:

- CenturyLink will utilize the existing Qwest Corporation d/b/a CenturyLink Change Management Process (CMP) to communicate system and product/process changes in the appropriate timing and format. CenturyLink will fully utilize CMP post Consolidation. To view the complete CMP document, visit the [CMP Website](#) or click on the [Wholesale Change Management Process Document](#) link

- Customers will enter new Local Service Requests in EASE.
- Customers will populate Local Service Requests in LSOG (Issue 2Q19 Dated June 30, 2014) standard format and in the 2nd version of XML format
- In-Flight Local Service Requests will continue ordering processing through the IMA system.

In-Flight Local Service Requests are:

When Customers submit Local Service Requests and CenturyLink acknowledges acceptance, but the processing of the Local Service Requests are not complete before the Consolidation weekend.

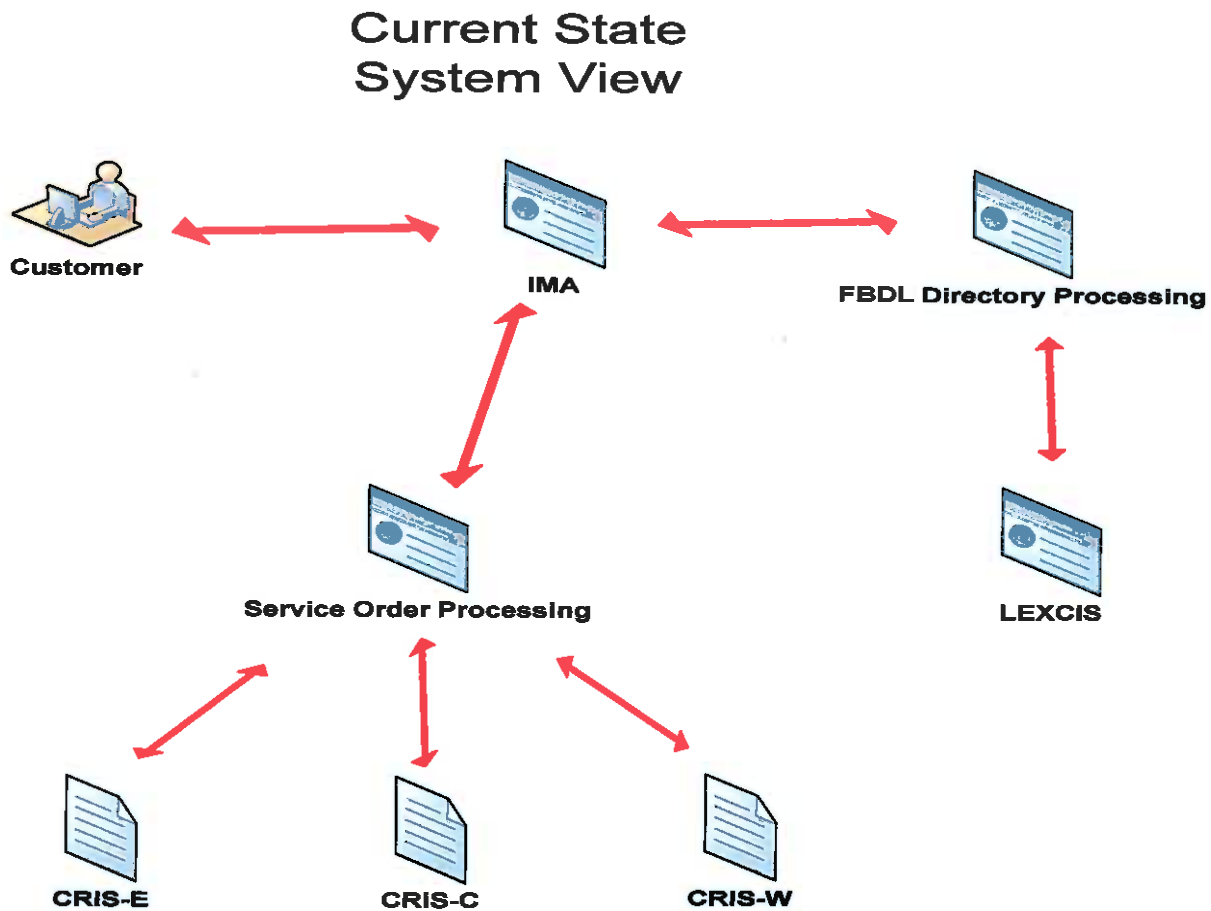
- IMA will retain inquiry capability of historical information on-line for 24 months from the completion of the IMA request.
- The LSR Consolidation will support the regulatory requirements for PID/PAP reporting. Data sourced in the retiring applications will be replaced with data from the newly introduced applications.
- As the project progresses, analysis and design activities may result in modifications to the Consolidation Plan.
- CenturyLink will comply with all applicable Merger Requirements

2 Ordering and Billing System Description

This section provides Customers with Current State and End State Ordering system views, common features, and information about the differences between Current State and End State systems. It also provides information about the functionality and applications that CenturyLink uses to facilitate Customer and system interfaces.

2.1 Current State System View

Century Link currently requires Customers, based on end user location, the use of two different systems to submit Local Service Requests, EASE and IMA.



2.1.1 IMA ordering platform

IMA is the current Local Service Request application supporting Local Service Requests for wholesale customers in the Legacy Qwest markets of CenturyLink. IMA includes a GUI application for direct order entry of Local Service Requests, pre-order inquiry and review of statuses and notifications. IMA also provides an electronic bonding gateway using XML to support system-to-system integration.

2.1.2 EASE ordering platform

EASE is the end-state Local Service Request ordering application to be used by Customers, as well as CenturyLink, allowing Local Service Request processing via a GUI, batch files, and real-time XML transactions.

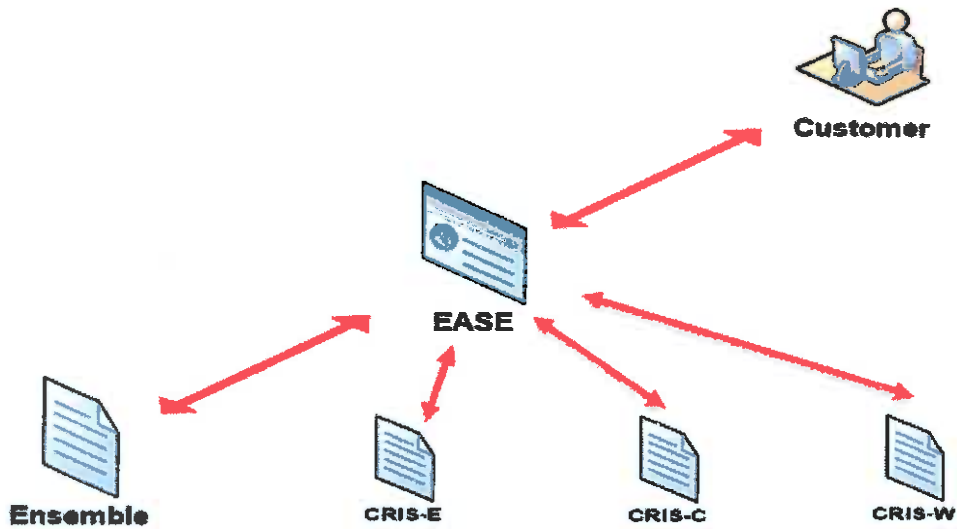
Included within EASE are:

- Edits
- Validations
- Pre-order information queries
- Status information

2.2 End State System View

2.2.1 Transition to common processes and system infrastructure

Customers will submit the Local Service Request via the EASE system. EASE will determine the area



2.3 Local Service Ordering End State System - EASE

EASE is an industry-compliant order entry and workforce management system that allows end-to-end review and management of Local Service Requests. The system consists of GUI and UOM/XML ordering capabilities. The system is robust and table driven with extensive business rule capabilities.

EASE follows industry-standard ordering business rules, including LSOG-based updates. EASE provides the following:

- Single, centralized platform for all Local Service Request processing
 - Supports both eBonding and Portal (Virtual Front Office (VFO) GUI) capabilities.
- Compliance with LSOG/Local Service Request industry standards and standard Local Service Request configurations
 - Manages all LSOG updates going forward.
- Integration with back office systems
 - Platform Application Programming Interface (API) to support additional integrations as needed for all Local Service Request volumes.
- Platform Expandability
 - Local Number Portability (LNP) / Local Service Request (Local Service Request) / Receive custom transaction types.

2.3.1 Service Ordering Comparison – IMA to EASE (LSOG 2Q19)

The following matrices provide a comparison of current IMA functionality and EASE Local Service Request functionality that will be available in user acceptance testing and deployed prior to conversion including planned development.

| General Functionality | IMA | EASE |
|--|-----|------|
| Support eBonding and portal for Local Service Request requests | Yes | Yes |
| LSOG Ver 2Q19 Compliant | No | Yes* |
| Auto-populate initiator information from User Profile | Yes | Yes* |
| Field Level Help | Yes | Yes* |
| Error messaging – identifies form and fields | Yes | Yes* |
| Auto navigation to fields in error | No | Yes |
| Recapping from pre-order to Local Service Request | Yes | Yes* |
| Multiple versions of XML | Yes | Yes* |
| Manage Users | Yes | Yes |
| Agent owner relationships | Yes | Yes |

*Indicates some development may be required prior to testing

2.3.1.1 Pre-Ordering

| Pre-Order Functionality | IMA | EASE |
|--|-----|------|
| Address Validation (by Street Address or TN) | Yes | Yes* |
| Appointment Scheduler Query (Select, Change, or Cancel) | Yes | Yes* |
| Carrier Facility Assignment Validation (Cable Facility, CFA Groups or Units queries) | Yes | Yes* |
| Customer Service Inquiry & Virtual Customer Service Inquiry Retrieval (by Street Address or TN) | Yes | Yes* |
| Directory Listing Inquiry (by Account TN, Listed TN, Non-Standard TN, Caption Name, or SLU Header TN) | Yes | Yes* |
| Design Layout Record Query (by Serial Number Circuit, TN Circuit, Carriers Facility Circuit, or Message Trunk Circuit) | Yes | Yes* |
| Facility Availability Validation (by TN, Address, or Circuit) | Yes | Yes* |
| Loop Qualification Query (by TN or Circuit) | Yes | Yes* |
| Meet Point Query (POTS Splitter or Cable Connection queries) | Yes | Yes* |
| Raw Loop Data Query (by TN, Address, or Circuit) | Yes | Yes* |
| Service Availability Query (by State and Service Type) | Yes | Yes* |
| TN Reservation Query (by Address and Custom TN selection criteria) | Yes | Yes* |

*Indicates some development may be required prior to testing

2.3.1.2 Ordering

| Order Functionality | IMA | EASE |
|---|-----|------|
| Create and submit a request | Yes | Yes* |
| Revise and resubmit a rejected request | Yes | Yes |
| Supplement a request | Yes | Yes |
| Up front order editing | Yes | Yes |
| Search Local Service Requests | Yes | Yes |
| Wildcard search | Yes | Yes |
| Local Service Request replication and template creation | Yes | Yes |
| | | |

2.3.1.3 Post Order Functionality

| Post Order Functionality | IMA | EASE |
|--|-----|------|
| Viewing and retrieving line loss information (by Account Number, Working TN, Circuit, Order number, PON, or Completion Date) | Yes | Yes |
| Status by Local Service Request and/or Service Orders | | |
| Error | Yes | Yes |
| Issued FOC | Yes | Yes |
| Jeopardy (Local Service Request) | Yes | Yes |
| Jeopardy (Internal Service Order) | Yes | Yes* |
| Order Completed | Yes | Yes* |
| Physical Work Completed | Yes | Yes |
| Posted to be billed | Yes | Yes* |
| Rejected | Yes | Yes* |
| Request Completed | Yes | Yes* |
| Notification Inquiries | | |
| BCN | Yes | Yes* |
| Bulk | Yes | Yes* |
| Completion | Yes | Yes* |
| Confirmation | Yes | Yes* |
| Error | Yes | Yes* |
| Jeopardy | Yes | Yes* |
| PSON | Yes | Yes* |
| Reject | Yes | Yes* |
| CFA Inventory | Yes | Yes* |
| Query for technician status and trouble ticket status | Yes | Yes* |

*Indicates some development may be required prior to CLEC testing

Note: Technical, legal and regulatory changes may affect information provided in the above table. Changes made following the introduction of this document in CMP are not reflected in the table above. This section is not intended to provide a complete listing of all capabilities.

Follow the link to access LSOG: <http://www.atis.org/obf/download.asp>

3 Consolidation Plan Implementation

3.1 Consolidation Plan Schedule and Milestones


3.1.1 Conversion Approach

All customers will be required to submit all LSR requests into the EASE LSR Platform on October 16, 2020. If desired, customers may work with CenturyLink prior to conversion to begin utilizing the platform as early as May of 2020.

3.1.2 Schedule and Milestones

Consolidation completion is targeted for September 2020. CenturyLink will follow the CMP process where it applies. This document will be updated when target dates are available for later phases.

The following table shows milestones that reflect the Consolidation Plan trajectory. CenturyLink will communicate updated milestones per the CMP process.

 = A milestone, established by the Merger Requirements, that alters the established CMP milestones schedule.

| Consolidation Plan Milestone | Date |
|---|-----------|
| CMP CR Issuance: SCRxxxxx | 11/4/15 |
| These can be found at: http://www.centurylink.com/wholesale/cmp/cr/crnumber_system_index.html | |
| CR Presentation at CMP Meeting | 12/18/19 |
| Local Service Request Consolidation Plan due | 1/16/2020 |
| Local Service Request Consolidation Plan Review Meeting | 1/16/2020 |
| Extended Customer Comment Window for Initial Release Notification, Initial Retirement Notice and Consolidation Plan | |
| CenturyLink issues response to CLEC comments and Final Retirement Notice, including the Final version of the Local Service Request Consolidation Plan | |
| Draft Interface Tech Specs | |
| Tech Specs Walk-through | |
| CLEC Comments for Interface Tech Specs | |

| Consolidation Plan Milestone | Date |
|---|------|
| Final Interface Tech Specs | |
| Product Process Notification associated with Level 2 OSS changes | |
| CLEC comments due on (New) GUI Release Notes | |
| CLEC comments due on Level 2 OSS Product Process changes | |
| Training available | |
| GUI Final Release Notice | |
| Final Notice For Level 2 OSS Product/Process Changes | |
| Customer Testing Begins with Local Service Request Consolidation Functionality (120 Days) | |
| Customer Testing Ends | |
| Customer Go/No Go Vote | |

3.2 Consolidation Plan Implementation

This section provides further details on the Consolidation Plan implementation, including testing, training, the conversion weekend consolidation plan, and contingency planning.

3.2.1 Internal CenturyLink Consolidation Testing

CenturyLink will execute test Local Service Requests through EASE to ensure that proper billing codes assignment occurs and the Local Service Requests flow successfully into billing. CenturyLink business SMEs (Subject Matter Experts) will check for accuracy and completeness.

The following is the standard process for this system consolidation:

- First, internal testing, fulfilling ‘mock’ orders from inputprocessing through billing, will occur prior to the Customer testing period.
- Test bills will be generated and compared to production bills for accuracy.

Comparisons will be reviewed for all circuits/products that are on the account, all monthly recurring charges, taxes, and any in-flight activity such as pending payments, one-time charges and disputes. CenturyLink resources will investigate fall-out during the comparison process and update the processes/programs to assure billing accuracy.

CenturyLink subject matter experts familiar with the EASE/IMA and CRIS/Ensemble systems and processes will participate in testing and validation. In addition, contract resources will supplement internal resources to ensure intense focus on Consolidation activity and to allow 24-hour cycles.

3.2.2 Training and Process Plan

Per the Merger Agreement, CenturyLink will provide Customer training and education without charge.

During the migration, CenturyLink will provide:

- A Customer walk-through prior to the onset of Customer testing
- An additional Customer walk-through of the training before Consolidation
- Updated external documentation prior to Customer testing

3.2.3 Customer Testing

In accordance with the Merger Agreement, CenturyLink will make available a testing environment at the appropriate time for the Customers to test submission of Local Service Requests via the EASE ordering system. A testing schedule will allow the generation of test bills and Customer Service Records at scheduled intervals during the testing window. Before testing begins, the process to log and track defects will be communicated.

3.2.4 Load & Performance (L&P) Testing

CenturyLink completed an analysis of the increased demand on EASE to process IMA transactions. To meet the peak expected volume from this Consolidation, EASE processing capability was increased. CenturyLink modifies processing capacity by using internal virtual server environments allowing CenturyLink to respond quickly to capacity issues.

In addition to the completed performance analysis, CenturyLink will perform a Load & Performance test on EASE based on the anticipated volume after the IMA volume is included. Specifically:

- The Load & Performance test will be conducted prior to Consolidation.
- The combined Local Service Request transaction volume for the preceding 36 months will be made available to Customers
- The highest monthly volume of aggregate transactions for the preceding 12 months will serve as the testing baseline
- Using the highest monthly volume, a single day's average transaction volume of Local Service Requests will be calculated
- 125% of the single day's transaction volume will be processed and performance metrics captured
- These metrics will be available to Customers

3.2.5 Production Conversion Plan

The Consolidation will begin April 2020. The EASE Local Service Request and Ensemble applications will then be in use for that region post-conversion. This

means that Customers will submit Local Service Requests via IMA pre-Consolidation weekend and new Local Service Requests post-Consolidation will go into EASE. The weekend Consolidation cutover will be for all properties in the impacted regions. The Consolidation weekends will be scheduled near the end of a month following the completion of all billing cycles for that month, and before any billing cycles executed in the following month.

Customers will receive notifications of the Consolidation's extended weekend maintenance window. There will be a live bridge open at CenturyLink with key CenturyLink resources to immediately investigate and address concerns once production systems are back online. Customers will receive issue ticket logging and escalations processes prior to the Consolidation weekend. At Consolidation, all existing products billed in CRIS will convert and all new bills will be generated from Ensemble for the impacted region.

3.2.6 Post Conversion Support

Post-conversion support staff will be available to assist key operational functions including ordering centers, care functions, provisioning operation centers and billing teams with any post-conversion issues. The support team will include program, IT and functional SMEs. Internal status meetings will be conducted regularly to monitor progress. Customers will be supported by their normal operations centers. CenturyLink will ensure its staffing and training will accommodate post conversion demand.

3.2.7 Contingency Plan

In the event of catastrophic issues with the production system during migration weekend, customers would continue to utilize the IMA ordering platform. The implementation of this plan would only occur in the event of catastrophic issues with the production system during that weekend.

Once the consolidation is complete, source databases will be modified to 'read only' where applicable.

Appendix A: Regulatory Organizations, Guidelines and Standards

The following is a list of regulatory organizations, guidelines and industry standards mentioned in this document.

- LSOG (Local Service Ordering Guidelines)
 - <http://www.atis.org/obf/download.asp>
- CMP (CenturyLink Change Management Process)
 - <http://www.centurylink.com/wholesale/cmp/review.html>
- FCC (Federal Communications Commission)
 - www.fcc.gov/
- PUC (Public Utility Commissions)
 - The following link is to the National Association of Regulatory Utility Commissioners. You will be able to obtain information about Public Utilities Commissions by State
<http://www.naruc.org/Commissions/>

Appendix B: Glossary

The glossary lists terms and acronyms used in this document with descriptions and definitions.

| Term/Acronym | Description/Definition |
|---------------------------|--|
| API | Application Programming Interface |
| BAN | Billing Account Number |
| CFA | Carrier Facility Assignment |
| CLEC | Competitive Local Exchange Carrier |
| CMP | Change Management Process |
| | |
| CRB | Customer Records and Billing |
| CRIS | Customer Records and Information System |
| CSR | Customer Service Records |
| Current State System View | Denotes CenturyLink's existing systems and their functionality pre-Consolidation |
| EASE | Electronic Administration & Service Order Exchange |
| End State System View | Denotes CenturyLink's systems and functionality post Consolidation |
| FBDL | Facility Based Directory Listing |
| FCC | Federal Communications Commission (USA) |
| GUI | Graphical User Interface |
| ILEC | Incumbent Local Exchange Carrier |
| IMA | Interconnect Mediated Access |
| LEC | Local Exchange Carrier |
| LEXCIS | Local Exchange Carrier Invoice System |
| LNP | Local Number Portability |
| LSOG | Local Service Ordering Guidelines |
| LSR | Local Service Request |
| NC | Network Channel |
| NCI | Network Channel Interface |
| OSS | Operating Service System |
| PUC | Public Utility Commissions |

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|------|------------------------------|
| RLEC | Rural Local Exchange Carrier |
| S.O. | Service Order |
| SOE | Service Order Entry |
| UOM | Uniform Ordering Model |
| USOC | Universal Service Order Code |
| VFO | Virtual Front Office |
| WTN | Working Telephone Number |