

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

In the Matter of )  
                        )  
CenturyLink Communications, LLC, Applicant      )  
For Authorization to Obtain Numbering              )  
Resources Pursuant to Section 52.15(g) of        )  
the Commission's Rules                              )  
  )

WC Docket No. 19-\_\_\_\_\_

**APPLICATION OF CENTURYLINK COMMUNICATIONS, LLC FOR  
INTERCONNECTED VOIP NUMBERING AUTHORIZATION**

CenturyLink Communications, LLC (“CCLLC”), a current provider of interconnected voice over internet protocol (“iVoIP”) service, files this application with the Federal Communications Commission (the “Commission”) for authorization to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (the “Numbering Administrators”) pursuant to Commission rule section 52.15(g)(3).<sup>1</sup>

CCLLC provides the following information in support of its application:

1. Company Information. CCLLC’s address is 100 CenturyLink Drive, Monroe, LA 71203 and its general corporate telephone number is (318) 388-9000. For purposes of this application, inquiries pertaining to issues associated with 9-1-1, law enforcement, and general compliance with Commission rules can be directed to Stacy Hartman, VP Public Policy & Compliance, by telephone at (720) 578-3421 or by electronic mail at [stacy.hartman@centurylink.com](mailto:stacy.hartman@centurylink.com).
2. Acknowledgements. CCLLC acknowledges that:
  - a. grant of the authorization sought by this application is subject to compliance with

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<sup>1</sup> 47 C.F.R. § 52.15(g)(3).

applicable Commission numbering rules, numbering authority delegated to the States, and industry guidelines and practices regarding numbering as applicable to telecommunications carriers; and

b. it must file requests for numbers with the relevant State commissions at least thirty (30) days before requesting numbers from the Numbering Administrators.

3. Service Readiness.

a. CCLLC is capable of providing iVoIP service within sixty (60) days of the numbering resources activation date in accordance with Commission Rule Section 52.15(g)(2)<sup>2</sup> because it owns and operates facilities for the provision of iVoIP services, has provided iVoIP services for several years and continues to provide those services at the present time. CCLLC's iVoIP portfolio includes but is not limited to: Digital Home Phone (service guide available at <https://www.centurylink.com/home/help/home-phone/digital-home-phone.html>) and Digital Phone (service guide available at <https://www.centurylink.com/asset/small-business/user-guides/voip/BusinessVoIPWelcomeGuide.pdf>). CCLLC contributes to the Universal Services Fund ("USF") and Telecommunications Relay Services Fund ("TRSF") due to its provision of these services, which are offered over multiple sales channels, including via its website at [www.centurylink.com](http://www.centurylink.com).

b. CCLLC owns and operates network facilities by which service is provided to customers of CCLLC's business and consumer iVoIP offerings referenced above. Numbers acquired directly from the Numbering Administrators will be used for customers of these services provided over these facilities. CCLLC currently acquires numbers from its affiliates. CCLLC is obtaining a separate operating company number ("OCN") for its iVoIP services and

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<sup>2</sup> 47 C.F.R. § 52.15(g)(2).

will use this OCN to acquire numbers for its iVoIP services directly from the Numbering Administrators following grant of this application. Once this application is approved, CCLLC intends to transfer some of its existing numbers to IPES numbers.

4. Certifications. CCLLC certifies to the following, supported by the attached certification of Stacy Hartman, VP Public Policy & Compliance:

a. CCLLC complies with its USF contribution obligations under Commission Rule Part 54,<sup>3</sup> its TRSF contribution obligations under Commission Rule Section 64.604(c)(5)(iii),<sup>4</sup> its NANP and LNP administration contribution obligations under Commission Rule Sections 52.17 and 52.32,<sup>5</sup> its obligations to pay regulatory fees under Commission Rule Section 1.1154,<sup>6</sup> and its 911 obligations under Commission Rule Part 9.9.<sup>7</sup>

b. CCLLC possesses the financial, managerial, and technical expertise to provide reliable iVoIP service. CCLLC is a wholly-owned subsidiary of CenturyLink, Inc. (“CenturyLink”), a publicly-traded Louisiana corporation with a website of [www.centurylink.com](http://www.centurylink.com). The senior management of CenturyLink has great depth in the telecommunications industry and offers extensive telecommunications business, technical and managerial expertise to CenturyLink. Key management and technical personnel include, among others:

David Cooper, VP Global Voice Engineering  
Greg Wallace, VP Global Network Architecture

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<sup>3</sup> 47 C.F.R. Part 54, Subpart H.

<sup>4</sup> 47 C.F.R. § 64.604(c)(5)(iii).

<sup>5</sup> 47 C.F.R. §§ 52.17, 52.32.

<sup>6</sup> 47 C.F.R. § 1.1154.

<sup>7</sup> 47 C.F.R. Part 9.

None of these personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

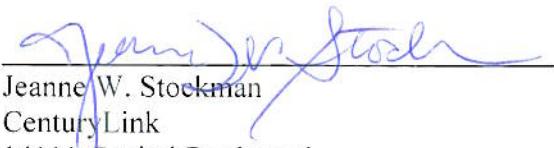
c. No party to the application, as defined in Commission rule section 1.2002(b), is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Pursuant to Commission Rule Section 52.15(g)(3), CCLLC respectfully requests the Commission authorize it to obtain numbering resources directly from the Numbering Administrators.

Respectfully submitted,

**CENTURYLINK COMMUNICATIONS, LLC**

By:

  
Jeanne W. Stockman  
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[Jeanne.W.Stockman@centurylink.com](mailto:Jeanne.W.Stockman@centurylink.com)

Its Attorney

Dated: November 14, 2019

Certification of Stacy Hartman

I certify as follows:

1. My name is Stacy Hartman and my business address is 700 W Mineral Ave, Littleton, Colorado 80120. I am VP Public Policy & Compliance for CenturyLink, the parent company of CCLLC. I lead a team responsible for meeting CCLLC's external financial reporting requirements to the Federal Communications Commission ("FCC"), to the Universal Service Administration Company ("USAC"), and to each of the state regulatory commissions on behalf of CCLLC and other regulated affiliates.
2. CCLLC provides interconnected VoIP service, including but not limited to Digital Home Phone (service guide available at <https://www.centurylink.com/home/help/home-phone/digital-home-phone.html>) and Digital Phone (service guide available at <https://www.centurylink.com/asset/small-business/user-guides/voip/BusinessVoIPWelcomeGuide.pdf>). CCLLC offers its interconnected VoIP services over multiple channels, including via the web at www.centurylink.com. Numbers acquired by authorization obtained through this application will be put into use within sixty (60) days.
3. CCLLC complies with its USF contribution obligations under Commission Rule Part 54, its TRSF contribution obligations under Commission Rule Section 64.604(c)(5)(iii), its NANP and LNP administration contribution obligations under Commission Rule Sections 52.17 and 52.32, its obligations to pay regulatory fees under Commission Rule Section 1.1154, and its 911 obligations under Commission Rule Part 9.9.
4. CCLLC possesses the financial, managerial, and technical expertise to provide reliable

interconnected VoIP service. Key management and technical personnel include, among others:

David Cooper, VP Global Voice Engineering  
Greg Wallace, VP Global Network Architecture

None of these personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

5. No party to the application, as defined in Commission rule section 1.2002(b), is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

The foregoing is true and correct based upon my personal knowledge, review of corporate and business records, and information provided to me by persons knowledgeable about CCLLC and its operations.

Executed on October 11, 2019

*Stacy Hartman*  
Stacy Hartman