###### CenturyLink Response to Document in Review

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| **Comment Response Date:** | **November 3, 2021** |
| **Document Subject:** | **PCAT Updates-2nd Batch** |
| **Initial Notification Date:** | **October 28, 2021** |
| **Initial Notification Number:** | **GENL.CTLL.10.28.21.F.18282.PCAT\_UPDTES-2ND\_BATCH** |
| **Category of Change:** | **Level 2** |

CenturyLink recently posted proposed updates regarding **PCAT Updates-2nd Batch.**

CLECs were invited to provide comments during a Document Review period from **October 28, 2021 through November 4, 2021**. The information listed below is CenturyLink’s Response to CLEC comments provided during the review/comment cycle.

**Resources**:

Document Review Site: <http://www.centurylink.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact CenturyLink’s Change Management Manager at cmpcomm@centurylink.com.

CenturyLink’s Response to Comments on: **PCAT Updates-2nd Batch:**

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| **#** | **CLEC Comment** | **CenturyLink Response** |
| 12 | **Allstream****November 2, 2021**1. multiplexing has Please complete the below information.  Allstream would like a clear understanding of the edits Lumen is adding to EASE LSR and ASR to block LSRs and ASRs for forborne products.

| **Forbearance Product** | **LSR/ASR REQTYP** | **LSR Activity** | **LSR/ASR NC**  | **CLLI Code** | **Effective date of edit** |
| --- | --- | --- | --- | --- | --- |
| Enhanced Extended Loop (EEL) |  |  |  |  |  |
|   Loop Mux Combination (LMC) |  |  |  |  |  |
|  Unbundled Dedicated Interoffice Transport (UDIT) |  |  |  |  |  |
| Unbundled Local Loop - 2-Wire or 4-Wire Analog (Voice Grade) Loop |  |  |  |  |  |

1. If Lumen is implementing new business rules, the LSOG, EASE User Guides should be updated to reflect the new business rules.
2. Regarding ACT M and T after the forbearance effective date but before the end of the transition period, it is Allstream’s position that if the end user address does not change and only the suite/room is changing, Allstream should be able to submit LSR/ASR and maintain the Unbundled Network Element during the transition period.
3. Regarding ACT C after the forbearance effective date but before the end of the transition period, it is Allstream’s position that it should be able to submit LSR/ASR and maintain the Unbundled Network Element during the transition period.
4. Handling of disconnects in error after the forbearance effective date but before the end of the transition period, it is Allstream’s position that during the transition period, CLECs should be able to reestablish Unbundled Network Elements disconnected in error regardless of reason.
5. [Unbundled Local Loop - 2-Wire or 4-Wire Analog (Voice Grade) Loop - V33.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2funloop24wireanalogvoice.html&umid=353ACC13-CFD6-6405-B54D-6E4F293ACF62&auth=19120be9529b25014b618505cb01789c5433dae7-cab4f19677429f4e3382dd97c433f91b29abd59f).   Can you explain whether Lumen is limiting 2-Wire or 4-Wire Analog Loop requests?
6. Previous comment and response: It is Allstream’s understanding that new commingling of Special Access Transport and Unbundled Loops is available until the Unbundled Loop components are forborne. Please confirm.

Lumen response Confirmed.  Where commingling is available, it will continue to be supported until the effective date of forbearance of the commingled product. 1. Previous comment and response: It is Allstream’s understanding that when Unbundled Transport transitions to Special Access rates next year, CLECs retain UNE Muxing and will be able to terminate new Unbundled Loops on the Special Access transport until the Unbundled Loop components are forborne. Please confirm.

 Lumen Response: Due to Loop Mux Combinations being forborne and also restricted from new orders, new UNE been unavailable since January 12, 2020 as per FCC-19-66 & FCC-19-72. Allstream Response: Allstream disagrees, please provide the citation for the part of the Orders Lumen is referencing. | **November 8, 2021****CenturyLink’s response to your questions:**1. Please complete the below information.  Allstream would like a clear understanding of the edits Lumen is adding to EASE LSR and ASR to block LSRs and ASRs for forborne products.

| **Forbearance Product** | **LSR/ASR REQTYP** | **LSR Activity** | **LSR/ASR NC**  | **CLLI Code** | **Effective date of edit** |
| --- | --- | --- | --- | --- | --- |
| Enhanced Extended Loop (EEL) |  |  |  |  |  |
|   Loop Mux Combination (LMC) |  |  |  |  |  |
|  Unbundled Dedicated Interoffice Transport (UDIT) |  |  |  |  |  |
| Unbundled Local Loop - 2-Wire or 4-Wire Analog (Voice Grade) Loop |  |  |  |  |  |

See the below Technical Publications:<http://www.centurylink.com/wholesale/pcat/techpub/77417.pdf><http://www.centurylink.com/wholesale/pcat/techpub/77418.pdf>1. If Lumen is implementing new business rules, the LSOG, EASE User Guides should be updated to reflect the new business rules. Impacted Product collateral has been updated.
2. Regarding ACT M and T after the forbearance effective date but before the end of the transition period, it is Allstream’s position that if the end user address does not change and only the suite/room is changing, Allstream should be able to submit LSR/ASR and maintain the Unbundled Network Element during the transition period.These Action types will no longer be permitted.
3. Regarding ACT C after the forbearance effective date but before the end of the transition period, it is Allstream’s position that it should be able to submit LSR/ASR and maintain the Unbundled Network Element during the transition period.  Record only changes will continue to be supported.
4. Handling of disconnects in error after the forbearance effective date but before the end of the transition period, it is Allstream’s position that during the transition period, CLECs should be able to reestablish Unbundled Network Elements disconnected in error regardless of reason. Assuming customer initiates the disconnect, they will be disconnected with no ability to replace.  If CenturyLink disconnects in error, we will support reinstating the service.
5. [Unbundled Local Loop - 2-Wire or 4-Wire Analog (Voice Grade) Loop - V33.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2funloop24wireanalogvoice.html&umid=353ACC13-CFD6-6405-B54D-6E4F293ACF62&auth=19120be9529b25014b618505cb01789c5433dae7-cab4f19677429f4e3382dd97c433f91b29abd59f).   Can you explain whether Lumen is limiting 2-Wire or 4-Wire Analog Loop requests?  2-Wire or 4-Wire Analog (Voice Grade) Loops are now only supported under WAL commercial agreements and described in the relevant [PCAT](https://www.centurylink.com/wholesale/pcat/commercial-wholesale-analog-loop-WAL-2-Wire-or-4-Wire-Analog-Voice-Grade-Loop.html).  No restrictions on that commercial offer are identified in this notice.  This notice updates the [PCAT](http://www.centurylink.com/wholesale/pcat/unloop24wireanalogvoice.html) describing the ICA offer, which is now grandfathered.
6. Previous comment and response: It is Allstream’s understanding that new commingling of Special Access Transport and Unbundled Loops is available until the Unbundled Loop components are forborne. Please confirm.

Lumen response Confirmed.  Where commingling is available, it will continue to be supported until the effective date of forbearance of the commingled product. 1. Previous comment and response: It is Allstream’s understanding that when Unbundled Transport transitions to Special Access rates next year, CLECs retain UNE Muxing and will be able to terminate new Unbundled Loops on the Special Access transport until the Unbundled Loop components are forborne. Please confirm.

 Lumen Response: Due to Loop Mux Combinations being forborne and also restricted from new orders, new UNE multiplexing has been unavailable since January 12, 2020 as per FCC-19-66 & FCC-19-72. Allstream Response: Allstream disagrees, please provide the citation for the part of the Orders Lumen is referencing.  Please provide the specific details around the type of unbundled product Allstream is asserting continues to be available.  Lumen asserts that UDIT, EELs and LMCs are forborne as a result of FCC 19-66 and FCC 19-72.  If Allstream is wanting confirmation that another unbundled product will continue to be supported, we need specific information on what that product is to answer the question.   |