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

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| **Comment Response Date:** | **August 26, 2021** |
| **Document Subject:** | **UNE Ordering Limitations** |
| **Initial Notification Date:** | **August 19, 2021** |
| **Initial Notification Number:** | **CMPR.CTLL.08.19.21.F.18255.UNE\_Ordering\_Limitations** |
| **Category of Change:** | **Level 2** |

CenturyLink recently posted proposed updates regarding UNE Ordering Limitations.

CLECs were invited to provide comments during a Document Review period from August 19, 2021 through August 26, 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](mailto:cmpcomm@centurylink.com).

CenturyLink’s Response to Comments on: UNE Ordering Limitations:

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| **#** | **CLEC Comment** | **CenturyLink Response** |
| 1  2  3  4  5 | **Allstream**  **August 19, 2021**  I suspect this change greater than a Level 2 notice.  I guessing Lumen will need to change EASE Business Rules and/or UOM/XML specifications to block these orders. Typically, this type of change would be submitted by Lumen as a Regulatory Change Request.  Under the CMP process, the CLECs should have the opportunity to review the edits Lumen intends to activate so we can provide our questions and concerns.  I don’t see that the attached notice has been posted to the Document Review site - [https://www.centurylink.com/wholesale/cmp/review.html](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fcan01.safelinks.protection.outlook.com%2f%3furl%3dhttps%253A%252F%252Fimss91%2dctp.trendmicro.com%252Fwis%252Fclicktime%252Fv1%252Fquery%253Furl%253Dhttps%25253a%25252f%25252fcan01.safelinks.protection.outlook.com%25252f%25253furl%25253dhttps%2525253A%2525252F%2525252Fimss91%2dctp.trendmicro.com%2525252Fwis%2525252Fclicktime%2525252Fv1%2525252Fquery%2525253Furl%2525253Dhttps%252525253a%252525252f%252525252fwww.centurylink.com%252525252fwholesale%252525252fcmp%252525252freview.html%25252526umid%2525253D06CA41BC%2dC9EE%2d2C05%2d815A%2d39AA3DF24864%25252526auth%2525253D19120be9529b25014b618505cb01789c5433dae7%2dfb3631454267ea822ec023b7a96efe37d81337e3%252526data%25253d04%2525257C01%2525257CKim.Isaacs%25252540allstream.com%2525257C779a26b7d8164fbd94c308d963444ee7%2525257Cd0484f44efdf4959a2734163a45cd363%2525257C0%2525257C0%2525257C637649967300321041%2525257CUnknown%2525257CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%2525253D%2525257C1000%252526sdata%25253dzjtiHJZBaYxqzA9a6dgcbtO5YK%2525252FKkS9t%2525252F3t4FDN7zv8%2525253D%252526reserved%25253d0%2526umid%253D6D7DE3C2%2dC9EE%2d8205%2d9CF3%2d6527F8657ED6%2526auth%253D19120be9529b25014b618505cb01789c5433dae7%2dff8db612a641698ad131fcea2ff4aa0af026dc68%26data%3d04%257C01%257CKim.Isaacs%2540allstream.com%257C0d62b2f706804bafc24a08d9634c8759%257Cd0484f44efdf4959a2734163a45cd363%257C0%257C0%257C637650002606402596%257CUnknown%257CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%253D%257C1000%26sdata%3d3qAPEI49Stx6YLVaPGbzg%252BT7idNgr8aaPEotjeIRgGA%253D%26reserved%3d0&umid=3D9C5EF1-C9EF-3505-815A-310CB954152D&auth=19120be9529b25014b618505cb01789c5433dae7-63b8bb153b044d1dcb91e129352550afedb84e22) .  As part of the CMP process, you need to post, notice and Lumen’s response to comments.  **Allstream**  **August 19, 2021**  Who will be addressing my objection to the level of this notice and my request to see the Business Rules Lumen will be implementing?  We have had trouble with other ILECs  that have implemented similar VFO Business Rules blocking orders for forborne services and have run into a number of unintended consequence.   We would like to avoid a repeat of these issues with Lumen.  I will submit my other comments but here is one to consider.  How is Lumen going to handle Analog Loop orders when it is my understanding that the WAL commercial replacement will be ordered using the same process (REQTYP, TOS…) as the forborne UNE Analog Loops.  Will your new EASE Business Rules prohibit WAL orders? Thank you  **Allstream**  **August 19, 2021**  This is clearly a Level 4 Product Process Change (see below from the CMP Document)  If Lumen plans on changing existing EASE LSR and/or ASR Business Rules or UOM specifications, you follow the Change to Existing OSS process in Section 8 of the CMP Document.  In either case, Lumen will need to create a Regulatory Change Request and present the proposed EASE LSR and ASR edits it in September CMP meeting. **5.4.5    Level 4 Changes** Level 4 changes are defined as changes that have a major effect on existing CLEC operating procedures or that require the development of new procedures.  Level 4 changes will be originated using the CMP CR process and provide CLECs an opportunity to have input into the development of the change prior to implementation.  Level 4 Change Categories are:   * New products, features, services (excluding resale) * Increase to an interval in CenturyLink’s Service Interval Guide (SIG) * Changes to CMP * New PCAT/Tech Pub for new processes * New manual process * Limiting the availability and applicability or functionality of an existing product or existing feature * Addition of a required field on a form excluding mechanized forms that are changed through an OSS Interface CR (See Section 5.1)   **Allstream**  **September 1, 2021**  Allstream has experienced so many issues with other ILECs implementing these limitations that we are in a position where we will require Lumen to disclose the exact NC/NCI/SECNCI/REQTYP/TOS/et al LSR and ACT values Lumen will be using to limit orders with the date the limitations will go into effect.  **Allstream**  **September 7, 2021**  Allstream has the right to review Lumen’s interpretations of the effective dates and forbearance impacted NC/NCI/SECNCI/REQTYP/TOS/…and ACT LSR Field values.  You would be surprised how many times we have discovered errors or had a difference of opinion we needed to address prior to the effective date of a change.  Please provide the UNE Ordering Limitations by Lumen’s proposed Effective Dates by forbearance impacted NC/NCI/SECNCI/REQTYP/TOS/et al LSR and ACT values. | **August 19, 2021**  **CenturyLink’s response to your concern:**  I’m backing Michele up today and didn’t realize it needed to be posted to the Document Review site.  I will get that done now.  **August 19, 2021**  **CenturyLink’s response to your question:**  Jean Cisco will submit your objections and request to the email noted on the notice and they should be getting back to you.  I do know that several folks met internally to discuss what level this notice should be before being sent.  Can you give me some  Idea to pass along to them what level you believe it should be?  **August 24, 2021**  **CenturyLink’s response to your objection:**  The Level 2 notice details CenturyLink’s plan to automate validation for what is today a manual rejection of orders for products that were forborne as a result of the FCC Forbearance orders, and which are not offered otherwise under a commercial agreement.  Only Forborne offerings are being validated.  FCC Forbearance notices that were previously issued to our CLEC customers on 11/11/19 and 2/11/20, and 2/19/21 and 4/20/21, identified the specific dates for which forborne UNEs would no longer be available, consistent with the FCC orders.  A Level 4 notice is not applicable since the validation rules do not apply to any “existing product or existing feature.”  LSRs will be evaluated against the forborne products using NC/NCI/SECNCI/REQTYP/TOS/et al LSR values and will fail to validate requests which are supporting forborne offerings as indicated in the Forbearance orders.  Specifically, as it pertains to Analog UNE-L, the validation rules will not apply to those orders, for customers that have signed a commercial agreement for Wholesale Analog Loops.  **September 7, 2021**  **CenturyLink’s response to your request:**  Since the values did not change, Lumen did not add any additional comments or information.  **September 8, 2021**  **CenturyLink’s response to your request:**  The products we are immediately changing ordering guidance on in the LSR system are defined in the following Technical Publications:  <http://www.centurylink.com/techpub/77384/77384.pdf>  (only Unbundled DS3 Capable Loop initially)  <http://www.centurylink.com/wholesale/pcat/techpub/77418.pdf>  <http://www.centurylink.com/wholesale/pcat/techpub/77417.pdf>  Specific ordering guidance for each is included in the technical publication and that is the set of changes we are making. |