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

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| **Comment Response Date:** | **October 21, 2021** |
| **Document Subject:** | **PCAT Changes Only** |
| **Initial Notification Date:** | **October 13, 2021** |
| **Initial Notification Number:** | **GENL.CTLL.10.13.21.F.18280.PCAT\_Changes\_Only** |
| **Category of Change:** | **Level 2** |

CenturyLink recently posted proposed updates regarding **PCAT Changes Only.**

CLECs were invited to provide comments during a Document Review period from **October 14, 2021 through October 21, 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: **PCAT Changes Only:**

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| **#** | **CLEC Comment** | **CenturyLink Response** |
| 1  2 | **Allstream**  **October 18, 2021**   1. In previous discussions, Lumen indicated that it would be blocking/rejecting LSRs for forborne products using EASE edits. This notice indicates it is a PCAT update only. Is Lumen going to block LSRs for forborne products?    1. If Lumen is not blocking/rejecting LSRs what will happen if a CLEC orders a forborne product after the forbearance effective date?    2. If Lumen is blocking/rejecting, the below table represents Allstream’s understanding of the fields Lumen said it would use to limit “new” orders and the effective date of the limitation. If there are additional, factors to Lumen is using to edit LSRs please disclose them.  | **Forbearance Product** | **LSR REQTYP** | **LSR Activity** | **LSR NC** | **CLLI Code** | **Effective date of edit** | | --- | --- | --- | --- | --- | --- | | [2-Wire or 4-Wire Non-Loaded Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/2-Wire%20or%204-Wire%20Non-Loaded%20Loop%20PCAT.docx) | AB or BB | N or V | LX-N | Urbanized CLLIs only | 2/8/2023 | | [Asymmetric Digital Subscriber Line (ADSL) Compatible Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Asymmetric%20Digital%20Subscriber%20Line%20(ADSL)%20Compatible%20Loop%20PCAT.docx) | AB or BB | N or V | LXR- | Urbanized CLLIs only | 2/8/2023 | | [Digital Signal Level 1 (DS1) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Digital%20Signal%20Level%201%20(DS1)%20Capable%20Loop%20PCAT.docx) | AB | N | HC--  HCD-  HCE-  HCF-  HCG-  HCJ-  HCZ- | BDS Competitive CLLIs only | 2/8/2023 | | [Digital Signal Level 3 (DS3) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Digital%20Signal%20Level%203%20(DS3)%20Capable%20Loop%20PCAT.docx) | AB | N | HF--  HFC- | BDS Competitive CLLIs only | 2/8/2021 | | [Digital Subscriber Line - Integrated Services Digital (xDSL-I) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Digital%20Subscriber%20Line%20-%20Integrated%20Services%20Digital%20(xDSL-I)%20Capable%20Loop%20PCAT.docx) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 | | [Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Integrated%20Services%20Digital%20Network%20(ISDN)%20Basic%20Rate%20Interface%20(BRI)%20Capable%20Loop%20PCAT.docx) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 |      * 1. If Lumen is implementing new business rules, the LSOG, EASE User Guides, Training information an other documentation will need to be updated to support the new business rules  1. How will Lumen handle ACT M and T after the forbearance effective date but before the end of the transition period. 2. How will Lumen handle ACT C after the forbearance effective date but before the end of the transition period. 3. How will Lumen handle disconnects in error after the forbearance effective date but before the end of the transition period. 4. Lumen did not include [Unbundled Local Loop - 2-Wire or 4-Wire Analog (Voice Grade) Loop - V33.0](http://www.centurylink.com/wholesale/pcat/unloop24wireanalogvoice.html). Can you explain whether Lumen is limiting 2-Wire or 4-Wire Analog Loop requests?    1. If yes, the PCAT needs to be updated.    2. If yes, please outline the LSR fields and data elements Lumen is using to identify a 2/4-Wire Analog Loop requests.    3. If yes, what happens if the CLEC has a commercial WAL agreement?    4. If Lumen is not limiting 2/4 Wire Analog Loops and the CLEC does not have a commercial WAL agreement, what product is Lumen provisioning instead of an 2/4 Wire Analog Loop? 5. Lumen did not address Unbundled Transport [Enhanced Extended Loop (EEL) - V64.0](http://www.centurylink.com/wholesale/pcat/eel.html) , [Unbundled Dedicated Interoffice Transport (UDIT) - V41.0](http://www.centurylink.com/wholesale/pcat/udit.html), [Loop MUX Combination (LMC) - V55.0](http://www.centurylink.com/wholesale/pcat/lmc.html) . Will Lumen limit Unbundled Transport requests?    1. If yes, the PCATs need to be updated    2. If, yes please outline the ASR and LSR fields and data elements Lumen is using to identify only Unbundled Transport.    3. 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    4. 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.   **Allstream**  **October 26, 2021**  October 26, 2021  **CenturyLink’s response to your questions are noted in red:**  **Allstream’s additional comments in Bold Blue.**   1. In previous discussions, Lumen indicated that it would be blocking/rejecting LSRs for forborne products using EASE edits.  This notice indicates it is a PCAT update only.  Is Lumen going to block LSRs for forborne products?  Yes, per the previous notice.    1. If Lumen is not blocking/rejecting LSRs what will happen if a CLEC orders a forborne product after the forbearance effective date? N/A    2. If Lumen is blocking/rejecting, the below table represents Allstream’s understanding of the fields Lumen said it would use to limit “new” orders and the effective date of the limitation.  If there are additional, factors to Lumen is using to edit LSRs please disclose them. Please see the relevant Technical Publications for the published NC/NCI code combinations that are being limited under forbearance. **The below information is directly from the Lumen Technical Publications and the Lumen LSOG. Please confirm Allstream’s understanding of the edits Lumen is adding to EASE LSR to block LSRs for forborne products.**  | **Forbearance Product** | **LSR REQTYP** | **LSR Activity** | **LSR NC** | **CLLI Code** | **Effective date of edit** | | --- | --- | --- | --- | --- | --- | | [2-Wire or 4-Wire Non-Loaded Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2f2%2dWire%2520or%25204%2dWire%2520Non%2dLoaded%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-f82e2d6ca9d5deb940de638f955b3be75b2bcf9f) | AB or BB | N or V | LX-N | Urbanized CLLIs only | 2/8/2023 | | [Asymmetric Digital Subscriber Line (ADSL) Compatible Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fAsymmetric%2520Digital%2520Subscriber%2520Line%2520%28ADSL%29%2520Compatible%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-afe5ec37a3118ea261cb1a88d8298d7ca824dd50) | AB or BB | N or V | LXR- | Urbanized CLLIs only | 2/8/2023 | | [Digital Signal Level 1 (DS1) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fDigital%2520Signal%2520Level%25201%2520%28DS1%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-49a53c3e852a4bcac78300c14440f8f85ad95b42) | AB | N | HC--  HCD-  HCE-  HCF-  HCG-  HCJ-  HCZ- | BDS Competitive CLLIs only | 2/8/2023 | | [Digital Signal Level 3 (DS3) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fDigital%2520Signal%2520Level%25203%2520%28DS3%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-49ec58a2cc298c17a71ef67937127d7605e15d5a) | AB | N | HF--  HFC- | BDS Competitive CLLIs only | 2/8/2021 | | [Digital Subscriber Line - Integrated Services Digital (xDSL-I) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fDigital%2520Subscriber%2520Line%2520%2d%2520Integrated%2520Services%2520Digital%2520%28xDSL%2dI%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-fbbed226d2d69019385dd5cb9c0fc9f626a0a757) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 | | [Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fIntegrated%2520Services%2520Digital%2520Network%2520%28ISDN%29%2520Basic%2520Rate%2520Interface%2520%28BRI%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-79351eb04a46d5a9d4888d15480dfd8c6b0a967e) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 |  * 1. If Lumen is implementing new business rules, the LSOG, EASE User Guides, Training information and other documentation will need to be updated to support the new business rules. No changes are needed or allowed. **Below is information from the Lumen** [**LSOG**](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2017%2f170331%2fLSRPV8004%2d03%2d17.doc&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-a92d1c0ed4930da82b13ea42479c83ba78efd82d) **(**[**http://www.centurylink.com/wholesale/downloads/2017/170331/LSRPV8004-03-17.doc**](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2017%2f170331%2fLSRPV8004%2d03%2d17.doc&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-a92d1c0ed4930da82b13ea42479c83ba78efd82d) **).  This information is only one example from the LSOG that implies the CLECs can order ACT = N – New Unbundled Loops.  If Lumen is going to block ACT – N LSRs for Unbundled Loops the below information is incorrect.  Please explain, why Lumen believes a change or additional information is not needed?  At a minimum, the Tech Pubs, LSOGs, Users Guides, PCATs should all have the same message on forbearance. When a CLEC goes to the Lumen website, they may not go to the PCAT but instead review the Tech Pubs, LSOGs, User Guides individually.**   ACT - Activity (continued)   | RULE # | Products | Valid Entries | | --- | --- | --- | | **29** | * Unbundled Local Loop | * N, D, V, C, T (within the same wire center), M (For Information Only - UBL NID Move all states) |  1. How will Lumen handle ACT M and T after the forbearance effective date but before the end of the transition period.  These action types will not be permitted. **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 LSRs and maintain the UNE Loop.** 2. How will Lumen handle ACT C after the forbearance effective date but before the end of the transition period. Record only changes will continue to be supported. **Allstream disagrees – Typically a CFA change is not considered a “records only change”.  Allstream should be able to submit LSRs to change the CFA and maintain the UNE Loop.** 3. How will Lumen handle disconnects in error after the forbearance effective date but before the end of the transition period.  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. **Allstream disagrees and it is our expectation that if the Allstream initiates a disconnect in error Lumen will restore the service.** 4. Lumen did not include [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=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-b1b6db0b131843a8e7474dea81ac76d083320456).   Can you explain whether Lumen is limiting 2-Wire or 4-Wire Analog Loop requests?    1. If yes, the PCAT needs to be updated.  We are not limiting inbound WAL LSRs which are identical to the 2-Wire or 4-Wire Analog Loop requests.  We are in the process of updating the 2-Wire or 4-Wire Analog Loop PCAT in accordance with the FCC forbearance orders. **No further questions**    2. If yes, please outline the LSR fields and data elements Lumen is using to identify a 2/4-Wire Analog Loop requests.  Since there will be no edits in EASE implemented this is not applicable. **No further questions**    3. If yes, what happens if the CLEC has a commercial WAL agreement? Since there will be no edits in EASE implemented this is not applicable.  CLECs ordering this product after the forbearance date are ordering under the commercial agreement. **No further questions**    4. If Lumen is not limiting 2/4 Wire Analog Loops and the CLEC does not have a commercial WAL agreement, what product is Lumen provisioning instead of an 2/4 Wire Analog Loop?  There will be no edits on Analog loops.  CLECs ordering this product after the forbearance date are ordering under the commercial agreement. **How has Lumen shared this information with CLECs that don’t have commercial agreements in place?** 5. Lumen did not address Unbundled Transport [Enhanced Extended Loop (EEL) - V64.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2feel.html&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-7c00bc93d8633c79a6e02f985dda3be9737b3c80) , [Unbundled Dedicated Interoffice Transport (UDIT) - V41.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2fudit.html&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-efe55ffdd42e03b23bdc90de5aabfffe79625117), [Loop MUX Combination (LMC) - V55.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2flmc.html&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-b3f4b564b73aa876864ddac0a79136e654088330) .  Will Lumen limit Unbundled Transport requests?    1. If yes, the PCATs need to be updated.  Correct we will be limiting these orders.  We are in the process of updating this PCAT in accordance with the FCC forbearance orders. **No further questions**    2. If, yes please outline the ASR and LSR fields and data elements Lumen is using to identify only Unbundled Transport.  Please see the relevant Technical Publications for the published NC/NCI code combinations that are being limited under forbearance. **As noted above, Allstream would like Lumen to specifically confirm the NC/NCI code combinations, the LSR REQTYP, LSR Activity, and CLLI codes, Lumen intends to block.** 6. 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.  Confirmed.  Where commingling is available, it will continue to be supported until the effective date of forbearance of the commingled product. **No further questions** 7. 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.  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 disagrees, please provide the citation for the part of the Orders Lumen is referencing.**   **Thank you** | **October 21, 2021**  **CenturyLink’s response to your questions are noted in red:**   1. In previous discussions, Lumen indicated that it would be blocking/rejecting LSRs for forborne products using EASE edits. This notice indicates it is a PCAT update only. Is Lumen going to block LSRs for forborne products? Yes, per the previous notice.    1. If Lumen is not blocking/rejecting LSRs what will happen if a CLEC orders a forborne product after the forbearance effective date? N/A    2. If Lumen is blocking/rejecting, the below table represents Allstream’s understanding of the fields Lumen said it would use to limit “new” orders and the effective date of the limitation. If there are additional, factors to Lumen is using to edit LSRs please disclose them. Please see the relevant Technical Publications for the published NC/NCI code combinations that are being limited under forbearance.  | **Forbearance Product** | **LSR REQTYP** | **LSR Activity** | **LSR NC** | **CLLI Code** | **Effective date of edit** | | --- | --- | --- | --- | --- | --- | | [2-Wire or 4-Wire Non-Loaded Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/2-Wire%20or%204-Wire%20Non-Loaded%20Loop%20PCAT.docx) | AB or BB | N or V | LX-N | Urbanized CLLIs only | 2/8/2023 | | [Asymmetric Digital Subscriber Line (ADSL) Compatible Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Asymmetric%20Digital%20Subscriber%20Line%20(ADSL)%20Compatible%20Loop%20PCAT.docx) | AB or BB | N or V | LXR- | Urbanized CLLIs only | 2/8/2023 | | [Digital Signal Level 1 (DS1) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Digital%20Signal%20Level%201%20(DS1)%20Capable%20Loop%20PCAT.docx) | AB | N | HC--  HCD-  HCE-  HCF-  HCG-  HCJ-  HCZ- | BDS Competitive CLLIs only | 2/8/2023 | | [Digital Signal Level 3 (DS3) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Digital%20Signal%20Level%203%20(DS3)%20Capable%20Loop%20PCAT.docx) | AB | N | HF--  HFC- | BDS Competitive CLLIs only | 2/8/2021 | | [Digital Subscriber Line - Integrated Services Digital (xDSL-I) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Digital%20Subscriber%20Line%20-%20Integrated%20Services%20Digital%20(xDSL-I)%20Capable%20Loop%20PCAT.docx) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 | | [Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) Capable Loop PCAT](https://www.centurylink.com/wholesale/downloads/2021/211001/Integrated%20Services%20Digital%20Network%20(ISDN)%20Basic%20Rate%20Interface%20(BRI)%20Capable%20Loop%20PCAT.docx) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 |      * 1. 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Lumen did not include [Unbundled Local Loop - 2-Wire or 4-Wire Analog (Voice Grade) Loop - V33.0](http://www.centurylink.com/wholesale/pcat/unloop24wireanalogvoice.html). Can you explain whether Lumen is limiting 2-Wire or 4-Wire Analog Loop requests?    1. If yes, the PCAT needs to be updated. We are not limiting inbound WAL LSRs which are identical to the 2-Wire or 4-Wire Analog Loop requests. We are in the process of updating the 2-Wire or 4-Wire Analog Loop PCAT in accordance with the FCC forbearance orders.    2. If yes, please outline the LSR fields and data elements Lumen is using to identify a 2/4-Wire Analog Loop requests. Since there will be no edits in EASE implemented this is not applicable.    3. If yes, what happens if the CLEC has a commercial WAL agreement? Since there will be no edits in EASE implemented this is not applicable. CLECs ordering this product after the forbearance date are ordering under the commercial agreement.    4. If Lumen is not limiting 2/4 Wire Analog Loops and the CLEC does not have a commercial WAL agreement, what product is Lumen provisioning instead of an 2/4 Wire Analog Loop? There will be no edits on Analog loops. CLECs ordering this product after the forbearance date are ordering under the commercial agreement. 5. Lumen did not address Unbundled Transport [Enhanced Extended Loop (EEL) - V64.0](http://www.centurylink.com/wholesale/pcat/eel.html) , [Unbundled Dedicated Interoffice Transport (UDIT) - V41.0](http://www.centurylink.com/wholesale/pcat/udit.html), [Loop MUX Combination (LMC) - V55.0](http://www.centurylink.com/wholesale/pcat/lmc.html) . Will Lumen limit Unbundled Transport requests?    1. If yes, the PCATs need to be updated. Correct we will be limiting these orders. We are in the process of updating this PCAT in accordance with the FCC forbearance orders.    2. If, yes please outline the ASR and LSR fields and data elements Lumen is using to identify only Unbundled Transport. Please see the relevant Technical Publications for the published NC/NCI code combinations that are being limited under forbearance.    3. 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. Confirmed. Where commingling is available, it will continue to be supported until the effective date of forbearance of the commingled product.    4. 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. 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.   **October 27, 2021**  **CenturyLink’s response to your questions are noted in red:**  **Allstream’s additional comments in Bold Blue.**  **CenturyLink’s response to your questions are noted in yellow highlight:**   1. In previous discussions, Lumen indicated that it would be blocking/rejecting LSRs for forborne products using EASE edits.  This notice indicates it is a PCAT update only.  Is Lumen going to block LSRs for forborne products?  Yes, per the previous notice.    1. If Lumen is not blocking/rejecting LSRs what will happen if a CLEC orders a forborne product after the forbearance effective date? N/A    2. If Lumen is blocking/rejecting, the below table represents Allstream’s understanding of the fields Lumen said it would use to limit “new” orders and the effective date of the limitation.  If there are additional, factors to Lumen is using to edit LSRs please disclose them. Please see the relevant Technical Publications for the published NC/NCI code combinations that are being limited under forbearance. **The below information is directly from the Lumen Technical Publications and the Lumen LSOG. Please confirm Allstream’s understanding of the edits Lumen is adding to EASE LSR to block LSRs for forborne products.** As Allstream noted ordering guidance is provided in the Technical Publications relevant to each product.  | **Forbearance Product** | **LSR REQTYP** | **LSR Activity** | **LSR NC** | **CLLI Code** | **Effective date of edit** | | --- | --- | --- | --- | --- | --- | | [2-Wire or 4-Wire Non-Loaded Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2f2%2dWire%2520or%25204%2dWire%2520Non%2dLoaded%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-f82e2d6ca9d5deb940de638f955b3be75b2bcf9f) | AB or BB | N or V | LX-N | Urbanized CLLIs only | 2/8/2023 | | [Asymmetric Digital Subscriber Line (ADSL) Compatible Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fAsymmetric%2520Digital%2520Subscriber%2520Line%2520%28ADSL%29%2520Compatible%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-afe5ec37a3118ea261cb1a88d8298d7ca824dd50) | AB or BB | N or V | LXR- | Urbanized CLLIs only | 2/8/2023 | | [Digital Signal Level 1 (DS1) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fDigital%2520Signal%2520Level%25201%2520%28DS1%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-49a53c3e852a4bcac78300c14440f8f85ad95b42) | AB | N | HC--  HCD-  HCE-  HCF-  HCG-  HCJ-  HCZ- | BDS Competitive CLLIs only | 2/8/2023 | | [Digital Signal Level 3 (DS3) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fDigital%2520Signal%2520Level%25203%2520%28DS3%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-49ec58a2cc298c17a71ef67937127d7605e15d5a) | AB | N | HF--  HFC- | BDS Competitive CLLIs only | 2/8/2021 | | [Digital Subscriber Line - Integrated Services Digital (xDSL-I) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fDigital%2520Subscriber%2520Line%2520%2d%2520Integrated%2520Services%2520Digital%2520%28xDSL%2dI%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-fbbed226d2d69019385dd5cb9c0fc9f626a0a757) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 | | [Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) Capable Loop PCAT](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2021%2f211001%2fIntegrated%2520Services%2520Digital%2520Network%2520%28ISDN%29%2520Basic%2520Rate%2520Interface%2520%28BRI%29%2520Capable%2520Loop%2520PCAT.docx&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-79351eb04a46d5a9d4888d15480dfd8c6b0a967e) | AB or BB | N or V | AD--  ADU-- | Urbanized CLLIs only | 2/8/2023 |  * 1. If Lumen is implementing new business rules, the LSOG, EASE User Guides, Training information and other documentation will need to be updated to support the new business rules. No changes are needed or allowed. **Below is information from the Lumen** [**LSOG**](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2017%2f170331%2fLSRPV8004%2d03%2d17.doc&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-a92d1c0ed4930da82b13ea42479c83ba78efd82d) **(**[**http://www.centurylink.com/wholesale/downloads/2017/170331/LSRPV8004-03-17.doc**](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fdownloads%2f2017%2f170331%2fLSRPV8004%2d03%2d17.doc&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-a92d1c0ed4930da82b13ea42479c83ba78efd82d) **).  This information is only one example from the LSOG that implies the CLECs can order ACT = N – New Unbundled Loops.  If Lumen is going to block ACT – N LSRs for Unbundled Loops the below information is incorrect.  Please explain, why Lumen believes a change or additional information is not needed?  At a minimum, the Tech Pubs, LSOGs, Users Guides, PCATs should all have the same message on forbearance. When a CLEC goes to the Lumen website, they may not go to the PCAT but instead review the Tech Pubs, LSOGs, User Guides individually.**   ACT - Activity (continued)   | RULE # | Products | Valid Entries | | --- | --- | --- | | **29** | * Unbundled Local Loop | * N, D, V, C, T (within the same wire center), M (For Information Only - UBL NID Move all states) |   This document uses an out of date LSOG and should be removed from the centurylink.com website.  Thank you for bringing this to our attention we will be removing this.   1. How will Lumen handle ACT M and T after the forbearance effective date but before the end of the transition period.  These action types will not be permitted. **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 LSRs and maintain the UNE Loop.** These action types will not be permitted 2. How will Lumen handle ACT C after the forbearance effective date but before the end of the transition period. Record only changes will continue to be supported. **Allstream disagrees – Typically a CFA change is not considered a “records only change”.  Allstream should be able to submit LSRs to change the CFA and maintain the UNE Loop.** Only record only changes will continue to be supported. 3. How will Lumen handle disconnects in error after the forbearance effective date but before the end of the transition period.  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. **Allstream disagrees and it is our expectation that if the Allstream initiates a disconnect in error Lumen will restore the service.** Disconnects in error will not be restored. 4. Lumen did not include [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=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-b1b6db0b131843a8e7474dea81ac76d083320456).   Can you explain whether Lumen is limiting 2-Wire or 4-Wire Analog Loop requests?    1. If yes, the PCAT needs to be updated.  We are not limiting inbound WAL LSRs which are identical to the 2-Wire or 4-Wire Analog Loop requests.  We are in the process of updating the 2-Wire or 4-Wire Analog Loop PCAT in accordance with the FCC forbearance orders. **No further questions**    2. If yes, please outline the LSR fields and data elements Lumen is using to identify a 2/4-Wire Analog Loop requests.  Since there will be no edits in EASE implemented this is not applicable. **No further questions**    3. If yes, what happens if the CLEC has a commercial WAL agreement? Since there will be no edits in EASE implemented this is not applicable.  CLECs ordering this product after the forbearance date are ordering under the commercial agreement. **No further questions**    4. If Lumen is not limiting 2/4 Wire Analog Loops and the CLEC does not have a commercial WAL agreement, what product is Lumen provisioning instead of an 2/4 Wire Analog Loop?  There will be no edits on Analog loops.  CLECs ordering this product after the forbearance date are ordering under the commercial agreement. **How has Lumen shared this information with CLECs that don’t have commercial agreements in place?** This was shared in the forbearance notifications for 2/4 Wire Analog Loop and the subsequent announcements of the commercial offer. 5. Lumen did not address Unbundled Transport [Enhanced Extended Loop (EEL) - V64.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2feel.html&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-7c00bc93d8633c79a6e02f985dda3be9737b3c80) , [Unbundled Dedicated Interoffice Transport (UDIT) - V41.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2fudit.html&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-efe55ffdd42e03b23bdc90de5aabfffe79625117), [Loop MUX Combination (LMC) - V55.0](https://imss91-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.centurylink.com%2fwholesale%2fpcat%2flmc.html&umid=F1A10FB7-CF4A-B905-9365-F8A154580B39&auth=19120be9529b25014b618505cb01789c5433dae7-b3f4b564b73aa876864ddac0a79136e654088330) .  Will Lumen limit Unbundled Transport requests?    1. If yes, the PCATs need to be updated.  Correct we will be limiting these orders.  We are in the process of updating this PCAT in accordance with the FCC forbearance orders. **No further questions**    2. If, yes please outline the ASR and LSR fields and data elements Lumen is using to identify only Unbundled Transport.  Please see the relevant Technical Publications for the published NC/NCI code combinations that are being limited under forbearance. **As noted above, Allstream would like Lumen to specifically confirm the NC/NCI code combinations, the LSR REQTYP, LSR Activity, and CLLI codes, Lumen intends to block.** See response to 1b above. 6. 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.  Confirmed.  Where commingling is available, it will continue to be supported until the effective date of forbearance of the commingled product. **No further questions** 7. 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.  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 disagrees, please provide the citation for the part of the Orders Lumen is referencing.** Muxes are not orderable as separate UNE products.  They must be ordered in conjunction with other UNE offers and availability is governed by that offer’s forbearance state. |