

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

**RECEIVED**  
APR 08 2019  
SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

In the Matter of )  
 )  
Section 63.71 Application of )  
 )  
CenturyLink Communications, LLC f/k/a )  
Embarq Communications, LLC and )  
CenturyLink Communications, LLC f/k/a )  
Qwest Communications Company, LLC )  
d/b/a CenturyLink QCC )  
 )  
For Authority Pursuant to Section 214 of )  
the Communications Act of 1934, As Amended, )  
to Discontinue the Provision of Certain Service )

**SECTION 63.71 APPLICATION**

CenturyLink Communications, LLC (FRN: 0018-4219-41), f/k/a Embarq Communications, LLC and also f/k/a Qwest Communications Company, LLC d/b/a CenturyLink QCC (referred to herein as “CenturyLink”) hereby applies for authority to discontinue service to its remaining customers of certain Voice over Internet Protocol (“VoIP”) services that have operated on a VoIP platform, known as Sylantro, that is no longer technically supported. CenturyLink requests authority from the Federal Communications Commission (“Commission”) to discontinue these services as of May 30, 2020.

This application is related to a prior Section 63.71 application filed by CenturyLink on August 21, 2018 and granted by operation of law on October 8, 2018, seeking to discontinue the same services covered by this application.<sup>1</sup> After filing the August 21, 2018 Application,

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<sup>1</sup> See *In the Matter of Section 63.71 Application of CenturyLink Communications, LLC f/k/a Embarq Communications, LLC and CenturyLink Communications, LLC f/k/a Qwest*

CenturyLink discovered that it had inadvertently failed to notify three customers of its Sylanthro-based VoIP services. CenturyLink now seeks authority to discontinue service to those remaining customers.

CenturyLink submits the following information in support of its application:

**1. Name and address of carrier**

CenturyLink  
100 CenturyLink Drive  
Monroe, LA 71203

**2. Date of planned service discontinuance**

As of May 30, 2020, or as soon thereafter as the necessary regulatory approvals can be obtained, CenturyLink plans to cease offering the services supported by the Sylanthro VoIP platform in the manner outlined below.

Pursuant to the Commission's grant of the August 21, 2018 Application, CenturyLink has already discontinued offering the services supported by the Sylanthro VoIP platform to any new customers. The three customers covered by this application can maintain their existing Sylanthro VoIP platform services for the duration of their current service contract term, but will not be able to make moves, adds or changes to those services. If one or more of these customers decides to move to the new platform, they will sign a new contract and CenturyLink will waive any early termination penalties on their old contract.

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*Communications Company, LLC d/b/a CenturyLink QCC For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue the Provision of Service, Section 63.71 Application, WC Docket No. 18-266 (filed Aug. 21, 2018) (August 21, 2018 Application); Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications Services and/or Interconnected VoIP Services, WC Docket No(s). 18-262, 18-264, 18-265, 18-266, DA 18-922 (rel. Sept. 7, 2018).*

**3. Points of geographic areas of service affected**

CenturyLink seeks authority to discontinue offering services supported by the Sylanro VoIP platform in all 50 states and Washington D.C.

**4. Brief description of the type of services affected**

The Sylanro VoIP platform has reached its end of life and CenturyLink is seeking to discontinue the VoIP service provided to these customers over that platform, specifically Internet Protocol Telephony Service (IPTelS).

Affected customers will be able to maintain their current product configurations for the duration of their current service terms. Customers will also be able to transition to other VoIP solutions offered by CenturyLink on a new VoIP platform with new technology, capabilities and features, such as Flexible Managed Network Services, which include Hosted VoIP service and IQ SIP Trunk.

**5. Brief description of the dates and methods of notice to all affected customers**

CenturyLink sent a written notification of the planned discontinuance to the customers affected by the proposed discontinuance in accordance with Section 63.71(a) of the Commission's Rules. Customer notifications were sent via email and U.S. Mail on February 27, 2019. A copy of the notification is attached to this application (Attachment A).

**6. Dominance of carrier with respect to the service to be discontinued**

CenturyLink is a non-dominant carrier with regard to services supported by the Sylanro VoIP platform.

7. **Service**

In accordance with 47 C.F.R. § 63.71(a), CenturyLink has mailed and/or emailed a copy of this application to the Governor and public utility commission of each of the affected states and jurisdictions identified in Paragraph 3 above, to any federally-recognized Tribal Nations with authority over the Tribal lands in the geographic areas identified in Paragraph 3 above, as well as to the Special Assistant for Telecommunications under the Secretary of Defense.

Respectfully submitted,

**CENTURYLINK**

By: *Craig J. Brown* *by mh*  
Craig J. Brown  
CenturyLink, Inc.  
1099 New York Avenue, NW  
Suite 250  
Washington, DC 20001  
Phone 303-992-2503  
[Craig.J.Brown@CenturyLink.com](mailto:Craig.J.Brown@CenturyLink.com)

Its Attorney

**DATE:** April 4, 2019

Qwest Government Services, Inc.  
dba CenturyLink QGS  
4250 N. Fairfax Drive  
Arlington, VA. 22203

ATTACHMENT A



February 27, 2019

[REDACTED]

**Attention:** [REDACTED]

[REDACTED]

**Reference:** [REDACTED]

**Subject:** Notification of Internet Protocol Telephony Service Discontinuation under Contracts

Dear [REDACTED]

On February 25, 2019, I sent a letter informing you that CenturyLink intends to grandfather and discontinue its commercial Internet Protocol Telephony Service (IPTeIS). We have discovered an error in that letter in a statement required by the Federal Communications Commission at the end of that letter. This letter corrects that error but is otherwise identical to the February 25 letter.

Pursuant to Section C.2.1 of the subject contracts, notification is hereby provided that CenturyLink intends to grandfather and discontinue in all 50 states and Washington, DC, the commercial Internet Protocol Telephony Service (IPTeIS) currently purchased from CenturyLink, via its contract with [REDACTED]<sup>1</sup> Contingent on necessary regulatory approvals, this grandfathering and discontinuance will be effective at the end of the period of performance for the [REDACTED] contracts referenced above. Currently, [REDACTED]

[REDACTED] purchase IPTeIS under the [REDACTED] Contract, which has a performance period end date of March 28, 2020, and [REDACTED] purchases IPTeIS under the [REDACTED] Contract, which has a performance period end date of May 30, 2020. This action is part of CenturyLink's discontinuance of various VoIP services provided on an aging VoIP platform. Our decision to take this action is based on changing market conditions, including the retirement of technologies initially provided for service on the

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<sup>1</sup> The actual provider of IPTeIS is CenturyLink Communications LLC, f/k/a Embarq Communications, LLC and f/k/a Qwest Communications Company, LLC.

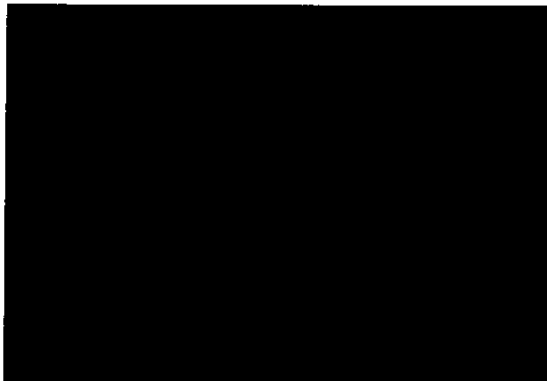
Qwest Government Services, Inc.  
dba CenturyLink QGS  
4250 N. Fairfax Drive  
Arlington, VA. 22203



██████████ contract. This letter supplements CenturyLink's notification of this proposed service discontinuance sent to ██████████ on December 14, 2018.

CenturyLink plans to recommend that agencies transition to a Hosted VoIP solution to ensure service continuity and our account teams are in the process of developing alternate solutions for these agencies. We will advise ██████████ when CenturyLink has obtained any necessary regulatory approvals.

The agencies impacted by this notification, their current services and monthly billings are identified below:



Please feel free to contact me with any additional information you deem necessary to execute a contract modification.

Sincerely,  
Qwest Government Services, Inc. dba CenturyLink QGS

A handwritten signature in cursive script that reads "Kathryn Elsner-Kerch".

Kathryn Elsner-Kerch, Senior Contract Manager-Federal

Qwest Government Services, Inc.  
dba CenturyLink QGS  
4250 N. Fairfax Drive  
Arlington, VA. 22203



**The following statement is required by the Federal Communications Commission (FCC):**

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of CenturyLink Communications, LLC formerly known as Embarq Communications, LLC and Qwest Communications, LLC d/b/a CenturyLink QCC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

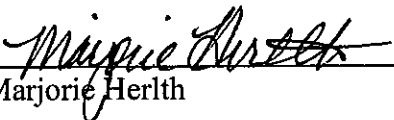
N-13-250

CERTIFICATE OF SERVICE

I, Marjorie Herlth, do hereby certify that I have caused the foregoing **SECTION 63.71**

**APPLICATION** to be:

- 1) Filed with the Secretary of the FCC via ECFS (Inbox-Section 214 Domestic Discontinuance Application);
- 2) Served via first-class U.S. Mail, postage prepaid, on the Governors of the States listed on the attached service list;
- 3) Served via first-class U.S. Mail, postage prepaid, on the Public Utility Commissions listed on the attached service list;
- 4) Served via first-class U.S. Mail, postage prepaid, or via email on the Regulatory Authority for the Tribal Nations listed on the attached service list; and
- 5) Served via first-class U.S. Mail, postage prepaid, on the Special Assistant for Telecommunications under the Secretary of Defense.

  
\_\_\_\_\_  
Marjorie Herlth

April 4, 2019



Kay Ivey  
Office of the Governor  
600 Dexter Avenue  
Montgomery, AL 36130

Alabama Public Service Commission  
P. O. Box 304260  
Montgomery, AL 36130-4260

Mike Dunleavy  
Office of the Governor  
P. O. Box 110001  
Juneau, AK 99811-0001

Regulatory Commission of Alaska  
Suite 300  
701 West 8<sup>th</sup> Avenue  
Anchorage, AK 99501-3469

Doug Ducey  
Office of the Governor  
Executive Tower  
1700 West Washington Street  
Phoenix, AZ 85007

Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007-2996

Asa Hutchison  
Office of the Governor  
500 Woodlane Street  
Little Rock, AR 72201

Arkansas Public Service Commission  
P. O. Box 400  
Little Rock, AR 72203-0400

Gavin Newsom  
Office of the Governor  
c/o State Capitol  
Suite 1173  
Sacramento, CA 95814

California Public Utilities Commission  
California State Building  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Jared Polis  
Office of the Governor  
136 State Capitol  
Denver, CO 80203-1792

Colorado Public Utilities Commission  
Suite 250  
1560 Broadway  
Denver, CO 80202

Ned Lamont  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, CT 06106

Connecticut Public Utilities Regulatory  
Authority  
10 Franklin Square  
New Britain, CT 06051

John C. Carney Jr.  
Office of the Governor  
150 Martin Luther King Jr. Blvd. South  
2<sup>nd</sup> Floor  
Dover, DE 19901

Delaware Public Service Commission  
Cannon Building, Suite 100  
861 Silver Lake Boulevard  
Dover, DE 19904

Muriel Bowser  
Executive Office of the Mayor of the  
District of Columbia  
1350 Pennsylvania Avenue, N.W.  
Suite 316  
Washington, DC 20004

District of Columbia Public Service  
Commission  
1325 G Street, N.W.  
Suite 800  
Washington, DC 20005

Ron DeSantis  
Office of Governor  
The Capitol  
400 S. Monroe St.  
Tallahassee, FL 32399

Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Brian Kemp  
Office of the Governor  
206 Washington Street  
111 State Capitol  
Atlanta, GA 30334

Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334-9052

David Ige  
Office of the Governor  
Executive Chambers  
State Capitol  
Honolulu, HI 96813

Hawaii Public Utilities Commission  
456 South King Street  
Room 103  
Honolulu, HI 96813

Brad Little  
Office of the Governor  
State Capitol  
P. O. Box 83720  
Boise, ID 83720

Idaho Public Utilities Commission  
P. O. Box 83720  
Boise, ID 83720-0074

J.B. Pritzker  
Office of the Governor  
207 State House  
Springfield, IL 62706

Illinois Commerce Commission  
Suite C-800  
160 North LaSalle Street  
Chicago, IL 60601

Eric Holcomb  
Office of the Governor  
Statehouse  
Indianapolis, IN 46204-2797

Indiana Utility Regulatory Commission  
PNC Center  
Suite 1500 E  
101 West Washington Street  
Indianapolis, IN 46204

Kim Reynolds  
Office of the Governor  
1007 East Grand Avenue  
Des Moines, IA 50319

Iowa Utilities Board  
Room 69  
1375 East Court Avenue  
Des Moines, IA 50319-0069

Laura Kelly  
Office of the Governor  
Capitol  
300 SW 10th Avenue, Suite 241S  
Topeka, KS 66612-1590

Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Matt Bevin  
Office of the Governor  
700 Capitol Avenue, Suite 100  
Frankfort, KY 40601

Kentucky Public Service Commission  
P. O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602-0615

John Bel Edwards  
Office of the Governor  
P. O. Box 94004  
Baton Rouge, LA 70804

Louisiana Public Service Commission  
P. O. Box 91154  
Baton Rouge, LA 70821-9154

Janet T. Mills  
Office of the Governor  
#1 State House Station  
Augusta, ME 04333-0001

Maine Public Utilities Commission  
18 State House Station  
Augusta, ME 04333-0018

Larry Hogan  
Office of the Governor  
100 State Circle  
Annapolis, MD 21401-1925

Maryland Public Service Commission  
16<sup>th</sup> Floor  
6 St. Paul Street  
Baltimore, MD 21202-6806

Charlie Baker  
Office of the Governor  
Massachusetts State House  
Room 280  
Boston, MA 02133

Massachusetts Department of  
Telecommunications & Cable  
100 Washington Street  
Suite 820  
Boston, MA 02118

Gretchen Whitmer  
Officer of the Governor  
P. O. Box 30013  
Lansing, MI 48909

Michigan Public Service Commission  
P. O. Box 30221  
Lansing, MI 48909

Tim Walz  
Office of the Governor  
116 Veterans Service Building  
20 W. 12<sup>th</sup> Street  
St. Paul, MN 55155

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
Suite 350  
St. Paul, MN 55101-2147

Phil Bryant  
Office of the Governor  
P. O. Box 139  
Jackson, MS 39205

Mississippi Public Service Commission  
501 N. West Street, Suite 201A  
Woolfolk Building  
Jackson, MS 39201-1174

Mike Parson  
Office of the Governor  
P. O. Box 720  
Jefferson City, MO 65102

Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102-0360

Steve Bullock  
Office of the Governor  
P. O. Box 200801  
Helena, MT 59620-0801

Montana Public Service Commission  
P. O. Box 202601  
Helena, MT 59620-2601

Pete Ricketts  
Office of the Governor  
Lincoln Office/State Capitol  
P. O. Box 94848  
Lincoln, NE 68509-4848

Nebraska Public Service Commission  
Suite 300  
1200 N Street  
Lincoln, NE 68508

Steve Sisolak  
Office of the Governor  
State Capitol Building  
101 N. Carson Street  
Carson City, NV 89701

Public Utilities Commission of Nevada  
1150 E. William Street  
Carson City, NV 89701-3109

Chris Sununu  
Office of the Governor  
State House  
107 North Main Street  
Concord, NH 03301

New Hampshire Public Utilities  
Commission  
Suite 10  
21 South Fruit Street  
Concord, NH 03301-2429

Phil Murphy  
Office of the Governor  
P. O. Box 001  
Trenton, NJ 08625

New Jersey Board of Public Utilities  
44 S. Clinton Avenue  
Trenton, NJ 08625

Michelle Lujan Grisham  
Office of the Governor  
490 Old Santa Fe Trail, Room 400  
Santa Fe, NM 87501

New Mexico Public Regulation Commission  
1120 Paseo de Peralta  
P. O. Box 1269  
Santa Fe, NM 87504

Andrew M. Cuomo  
Office of the Governor  
NYS State Capitol Building  
Albany, NY 12224

New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Roy Cooper  
Office of the Governor  
20301 Mail Service Center  
Raleigh, NC 27699-0301

North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4300

Doug Burgum  
Office of the Governor  
600 E Boulevard Avenue  
Bismarck, ND 58505-0001

North Dakota Public Service Commission  
Department 408  
600 E Boulevard  
Bismarck, ND 58505-0480

Mike DeWine  
Office of the Governor  
Riffe Center, 30<sup>th</sup> Floor  
77 South High Street  
Columbus, OH 43215-6117

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

Kevin Stitt  
Office of the Governor  
Oklahoma State Capitol  
2300 N. Lincoln Blvd., Room 212  
Oklahoma City, OK 73105

Oklahoma Corporation Commission  
P. O. Box 52000  
Oklahoma City, OK 73152-2000

Kate Brown  
Office of the Governor  
900 Court Street, NE  
Suite 160  
Salem, OR 97301

Public Utility Commission of Oregon  
P. O. Box 1088  
Salem, OR 97308-1088

Tom Wolf  
Office of the Governor  
508 Main Capitol Building  
Harrisburg, PA 17120

Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Gina M. Raimondo  
Office of the Governor  
82 Smith Street  
Providence, RI 02903

Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888



Henry McMaster  
Office of the Governor  
1205 Pendleton Street  
Columbia, SC 29201

Public Service Commission of South  
Carolina  
101 Executive Center Drive  
Suite 100  
Columbia, SC 29210

Kristi Noem  
Office of the Governor  
500 East Capitol Avenue  
Pierre, SD 57501

South Dakota Public Utilities Commission  
Capitol Building, 1<sup>st</sup> Floor  
500 East Capitol Avenue  
Pierre, SD 57501-5070

Bill Lee  
Office of the Governor  
State Capitol, 1<sup>st</sup> Floor  
Nashville, TN 37243

Tennessee Regulatory Authority  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Greg Abbott  
Office of the Governor  
P. O. Box 12428  
Austin, TX 78711-2428

Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, TX 78711-3326

Gary Herbert  
Office of the Governor  
350 North State Street, Suite 200  
P. O. Box 142220  
Salt Lake City, UT 84114-2220

Public Service Commission of Utah  
Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111

Phillip Scott  
Executive Office of the Governor  
109 State Street, Pavilion  
Montpelier, VT 05609

Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620-2701

Ralph Northam  
Office of the Governor  
P. O. Box 1475  
Richmond, VA 23218

Virginia State Corporation Commission  
P. O. Box 1197  
Richmond, VA 23218

Jay Inslee  
Office of the Governor  
P. O. Box 40002  
Olympia, WA 98504-0002

Washington Utilities and Transportation  
Commission  
P. O. Box 47250  
Olympia, WA 98504-7250

Jim Justice  
Office of the Governor  
State Capitol  
1900 Kanawha Boulevard, East  
Charleston, WV 25305

Public Service Commission of West  
Virginia  
201 Brooks Street  
Charleston, WV 25301

Tony Evers  
Office of the Governor  
115 East Capitol  
Madison, WI 53702

Public Service Commission of Wisconsin  
P. O. Box 7854  
Madison, WI 53707-7854

Mark Gordon  
 Office of the Governor  
 2323 Carey Avenue  
 Cheyenne, WY 82002-0010

Wyoming Public Service Commission  
 Hansen Building  
 2515 Warren Avenue  
 Suite 300  
 Cheyenne, WY 82002

Secretary of Defense  
 Attn. Special Assistant for Telecommunications  
 Pentagon  
 Washington, DC 20301

Ak-Chin Indian Community	<a href="mailto:rmiguel@ak-chin.nsn.us">rmiguel@ak-chin.nsn.us</a>
Arapaho Tribe of the Wind River Reservation, Wyoming	<a href="mailto:nora.willow@northernarapaho.com">nora.willow@northernarapaho.com</a>
Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin	<a href="mailto:MikeW@badriver-nsn.gov">MikeW@badriver-nsn.gov</a>
Burns Paiute Tribe	<a href="mailto:TribalCouncil@burnspaiute-nsn.gov">TribalCouncil@burnspaiute-nsn.gov</a>
Cherokee Nation	<a href="mailto:bill-baker@cherokee.org">bill-baker@cherokee.org</a>
Cheyenne River Sioux Tribe of the Cheyenne River Reservation, SD	<a href="mailto:haroldcfrazier@yahoo.com">haroldcfrazier@yahoo.com</a>
Cocopah Tribe of Arizona	<a href="mailto:cocotcsec@cocopah.com">cocotcsec@cocopah.com</a>
Confederated Salish & Kootenai Tribes of the Flathead Reservation	<a href="mailto:council@cskt.org">council@cskt.org</a>
Confederated Tribes and Bands of the Yakama Nation	<a href="mailto:JoDe@yakama.com">JoDe@yakama.com</a>
Confederated Tribes of Warm Springs	<a href="mailto:lynn.davis@wstribe.org">lynn.davis@wstribe.org</a>
Confederated Tribes of Siletz Indians of Oregon	<a href="mailto:dpigsley@msn.com">dpigsley@msn.com</a> <a href="mailto:BrendaB@ctsi.nsn.us">BrendaB@ctsi.nsn.us</a>
Confederated Tribes of the Chehalis Reservation	<a href="mailto:chairman@chehalistribe.org">chairman@chehalistribe.org</a>
Confederated Tribes of the Colville Reservation	<a href="mailto:neeka.somday@colvilletribes.com">neeka.somday@colvilletribes.com</a>
Confederated Tribes of the Grand Ronde Community of Oregon	<a href="mailto:cheryle.kennedy@grandronde.org">cheryle.kennedy@grandronde.org</a>
Confederated Tribes of the Umatilla Indian Reservation	<a href="mailto:garyburke@ctuir.org">garyburke@ctuir.org</a> <a href="mailto:margaritebecenti@ctuir.org">margaritebecenti@ctuir.org</a>
Coushatta Tribe of Louisiana	<a href="mailto:triciaponcho@coushattatribela.org">triciaponcho@coushattatribela.org</a>
Cowlitz Indian Tribe	<a href="mailto:wiyall@cowlitz.org">wiyall@cowlitz.org</a>

Crow Tribe of Montana	<a href="mailto:solomon.littleowl@crow-nsn.gov">solomon.littleowl@crow-nsn.gov</a> <a href="mailto:leah.dust@crow-nsn.gov">leah.dust@crow-nsn.gov</a>
Eastern Shoshone Tribe of the Wind River Reservation, Wyoming	<a href="mailto:cwagon@easternshoshone.org">cwagon@easternshoshone.org</a>
Flandreau Santee Sioux Tribe of South Dakota	<a href="mailto:president@fsst.org">president@fsst.org</a>
Forest County Potawatomi Community, Wisconsin	<a href="mailto:Ned.DanielsJr@fcpotawatomi-nsn.gov">Ned.DanielsJr@fcpotawatomi-nsn.gov</a>
Fort McDowell Yavapai Nation, Arizona	<a href="mailto:bburnette@ftmcdowell.org">bburnette@ftmcdowell.org</a>
Grand Traverse Band of Ottawa and Chippewa Indians, Michigan	<a href="mailto:Thurlow.McClellan@gtbindians.com">Thurlow.McClellan@gtbindians.com</a>
Ho-Chunk Nation of Wisconsin	<a href="mailto:wilfrid.cleveland@ho-chunk.com">wilfrid.cleveland@ho-chunk.com</a>
Hoh Indian Tribe	<a href="mailto:Bernard.Afterbuffalo@hohtribe-nsn.org">Bernard.Afterbuffalo@hohtribe-nsn.org</a>
Iowa Tribe of Kansas and Nebraska	<a href="mailto:trhodd@iowas.org">trhodd@iowas.org</a>
Jamestown S'Klallam Tribe	<a href="mailto:rallen@jamestowntribe.org">rallen@jamestowntribe.org</a>
Jena Band of Choctaw Indians	<a href="mailto:Chief@jenachoctaw.org">Chief@jenachoctaw.org</a>
Kewa Pueblo, New Mexico (Pueblo of Santo Domingo)	<a href="mailto:bquintana@kewa-nsn.us">bquintana@kewa-nsn.us</a>
Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas	<a href="mailto:bwhitewater@yahoo.com">bwhitewater@yahoo.com</a> <a href="mailto:Lester.Randall@ktik-nsn.gov">Lester.Randall@ktik-nsn.gov</a>
Klamath Tribes	<a href="mailto:don.gentry@klamathtribes.com">don.gentry@klamathtribes.com</a>
Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin	<a href="mailto:louis.taylor@lco-nsn.gov">louis.taylor@lco-nsn.gov</a>
Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	<a href="mailto:jwildcatsr@ldftribe.com">jwildcatsr@ldftribe.com</a>
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony, Nevada	<a href="mailto:btso@lvpaiute.com">btso@lvpaiute.com</a>
Lower Brule Sioux Tribe of the Lower Brule Reservation, SD	<a href="mailto:Chairman@lbtst.org">Chairman@lbtst.org</a>
Lower Elwha Tribal Community	<a href="mailto:fgcharles@elwha.org">fgcharles@elwha.org</a>
Lower Sioux Indian Community in the State of Minnesota	<a href="mailto:Brian.Pendleton@lowersioux.com">Brian.Pendleton@lowersioux.com</a>
Lummi Tribe of the Lummi Reservation	<a href="mailto:Stan.Choate@CenturyLink.com">Stan.Choate@CenturyLink.com</a>
Makah Indian Tribe of the Makah Indian Reservation	<a href="mailto:brittany.olson@makah.com">brittany.olson@makah.com</a>
Minnesota Chippewa Tribe - Bois Forte Band (Nett Lake)	<a href="mailto:Catherine.Chavers@boisforte-nsn.gov">Catherine.Chavers@boisforte-nsn.gov</a>
Minnesota Chippewa Tribe - Fond du Lac Band	<a href="mailto:kevindupuis@fdlrez.com">kevindupuis@fdlrez.com</a>
Minnesota Chippewa Tribe - Grand Portage Band	<a href="mailto:norman@grandportage.com">norman@grandportage.com</a>
Minnesota Chippewa Tribe - Leech Lake Band	<a href="mailto:Faron.Jackson@llojibwe.org">Faron.Jackson@llojibwe.org</a> <a href="mailto:burt.howard@llbo.org">burt.howard@llbo.org</a>
Minnesota Chippewa Tribe - Mille Lacs Band	<a href="mailto:melanie.benjamin@millelacsband.com">melanie.benjamin@millelacsband.com</a>
Minnesota Chippewa Tribe - White Earth Band	<a href="mailto:terrence.tibbetts@whiteearth-nsn.gov">terrence.tibbetts@whiteearth-nsn.gov</a>

Minnesota Chippewa Tribe, Minnesota (Six component reservations: Bois Forte Band (Nett Lake); Fond du Lac Band; Grand Portage Band; Leech Lake Band; Mille Lacs Band; White Earth Band)	<a href="mailto:gfrazer@mnchippewatribe.org">gfrazer@mnchippewatribe.org</a>
Muckleshoot Indian Tribe	<a href="mailto:virginia.cross@muckleshoot.nsn.us">virginia.cross@muckleshoot.nsn.us</a>
Navajo Nation, Arizona, New Mexico & Utah	<a href="mailto:russellbegaye@navajo-nsn.gov">russellbegaye@navajo-nsn.gov</a>
Nez Perce Tribe	<a href="mailto:nptec@nezperce.org">nptec@nezperce.org</a>
Nisqually Indian Tribe	<a href="mailto:choke.ken@nisqually-nsn.gov">choke.ken@nisqually-nsn.gov</a>
Oneida Nation	<a href="mailto:thill7@oneidanation.org">thill7@oneidanation.org</a>
Paiute Indian Tribe of Utah (Cedar Band of Paiutes, Kanosh Band of Paiutes, Koosharem Band of Paiutes, Indian Peaks Band of Paiutes, and Shivwits Band of Paiutes)	<a href="mailto:sparashonts@utahpaiutes.org">sparashonts@utahpaiutes.org</a>
Pascua Yaqui Tribe of Arizona	<a href="mailto:robert.valencia@pascuayaqui-nsn.gov">robert.valencia@pascuayaqui-nsn.gov</a>
Port Gamble S'klallam Tribe	<a href="mailto:dwellman@pgst.nsn.us">dwellman@pgst.nsn.us</a>
Prairie Band Potawatomi Nation	<a href="mailto:Liana@pbpnation.org">Liana@pbpnation.org</a>
Prairie Island Indian Community in the State of Minnesota	<a href="mailto:daniel.derudder@piic.org">daniel.derudder@piic.org</a> <a href="mailto:blake.johnson@piic.org">blake.johnson@piic.org</a>
Pueblo of Acoma, New Mexico	<a href="mailto:governor@puebloofacoma.org">governor@puebloofacoma.org</a>
Pueblo of Cochiti, New Mexico	<a href="mailto:governor@pueblodecochiti.org">governor@pueblodecochiti.org</a>
Pueblo of Isleta, New Mexico	<a href="mailto:Poigov@isletapueblo.com">Poigov@isletapueblo.com</a>
Pueblo of Nambe, New Mexico	<a href="mailto:governor@nambepueblo.org">governor@nambepueblo.org</a>
Pueblo of Picuris, New Mexico	<a href="mailto:governor@picurispueblo.org">governor@picurispueblo.org</a>
Pueblo of Pojoaque, New Mexico	<a href="mailto:LEdwards@pojoaque.org">LEdwards@pojoaque.org</a>
Pueblo of San Felipe, New Mexico	<a href="mailto:ssandoval@sfpueblo.com">ssandoval@sfpueblo.com</a>
Pueblo of San Ildefonso, New Mexico	<a href="mailto:governor@sanipueblo.org">governor@sanipueblo.org</a>
Pueblo of Sandia, New Mexico	<a href="mailto:snmontoya@sandiapueblo.nsn.us">snmontoya@sandiapueblo.nsn.us</a>
Pueblo of Santa Ana, New Mexico	<a href="mailto:governors@santaana-nsn.gov">governors@santaana-nsn.gov</a>
Pueblo of Taos, New Mexico	<a href="mailto:governor@taospueblo.com">governor@taospueblo.com</a>
Pueblo of Tesuque, New Mexico	<a href="mailto:cquintana@pueblooftesuque.org">cquintana@pueblooftesuque.org</a>
Pueblo of Zia, New Mexico	<a href="mailto:tammypino@yahoo.com">tammypino@yahoo.com</a>
Puyallup Tribe of the Puyallup Reservation	<a href="mailto:angel.robertiello@puyalluptribe.com">angel.robertiello@puyalluptribe.com</a>
Quechan Tribe of the Fort Yuma Indian Reservation - AZ & CA	<a href="mailto:executivesecretary@quechantribe.com">executivesecretary@quechantribe.com</a>
Quileute Tribe of the Quileute Reservation	<a href="mailto:renee.woodruff@quileutetribe.com">renee.woodruff@quileutetribe.com</a>
Quinault Indian Nation	<a href="mailto:fsharp@quinault.org">fsharp@quinault.org</a>
Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin	<a href="mailto:Richard.Peterson@redcliff-nsn.gov">Richard.Peterson@redcliff-nsn.gov</a>
Red Lake Band of Chippewa Indians	<a href="mailto:dseki@redlakenation.org">dseki@redlakenation.org</a>
Rosebud Sioux Tribe of the Rosebud Indian Reservation, South Dakota	<a href="mailto:rodney.bordeaux@rst-nsn.gov">rodney.bordeaux@rst-nsn.gov</a>
Sac and Fox Nation of Missouri in Kansas and Nebraska	<a href="mailto:chief@sacandfoxnation-nsn.gov">chief@sacandfoxnation-nsn.gov</a>
Sault Ste. Marie Tribe of Chippewa Indians, Michigan	<a href="mailto:aaronpayment@saulttribe.net">aaronpayment@saulttribe.net</a>

Seminole Tribe of Florida (Big Cypress and Brighton Reservations)	<a href="mailto:Chairman@semtribe.com">Chairman@semtribe.com</a>
Shakopee Mdewakanton Sioux Community of Minnesota+A85	<a href="mailto:dawn.blanchard@shakopeedakota.org">dawn.blanchard@shakopeedakota.org</a>
Shoshone-Bannock Tribes of the Fort Hall Reservation	<a href="mailto:nsmall@sbtribes.com">nsmall@sbtribes.com</a>
Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada	<a href="mailto:howard.tedl@shopai.org">howard.tedl@shopai.org</a>
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation	<a href="mailto:webadmin@swo-nsn.gov">webadmin@swo-nsn.gov</a>
Skokomish Indian Tribe	<a href="mailto:gmillier@skokomish.org">gmillier@skokomish.org</a>
Snoqualmie Indian Tribe	<a href="mailto:virgil.wade@snoqualmietribe.us">virgil.wade@snoqualmietribe.us</a>
Southern Ute Indian Tribe of the Southern Ute Reservation, Colorado	<a href="mailto:efrost@southernute-nsn.gov">efrost@southernute-nsn.gov</a>
Spokane Tribe of the Spokane Reservation	<a href="mailto:carole@spokanetribe.com">carole@spokanetribe.com</a>
Squaxin Island Tribe of the Squaxin Island Reservation	<a href="mailto:acooper@squaxin.us">acooper@squaxin.us</a>
St. Croix Chippewa Indians of Wisconsin	<a href="mailto:March 8LewisT@stcroixtribalcenter.com">March 8LewisT@stcroixtribalcenter.com</a>
Standing Rock Sioux Tribe of North & South Dakota	<a href="mailto:info@standingrock.org">info@standingrock.org</a>
Suquamish Indian Tribe of the Port Madison Reservation	<a href="mailto:lforsman@suquamish.nsn.us">lforsman@suquamish.nsn.us</a>
Tohono O'odham Nation of Arizona	<a href="mailto:edwardd.manuel@tonation-nsn.gov">edwardd.manuel@tonation-nsn.gov</a>
Tonto Apache Tribe of Arizona	<a href="mailto:jdecola@tontoapache.org">jdecola@tontoapache.org</a>
Tunica-Biloxi Indian Tribe	<a href="mailto:msampson@paragoncasinoresort.com">msampson@paragoncasinoresort.com</a>
Upper Sioux Community, Minnesota	<a href="mailto:kevinj@uppersiouxcommunity-nsn.gov">kevinj@uppersiouxcommunity-nsn.gov</a>
Ute Mountain Ute Tribe	<a href="mailto:hcuthair@utemountain.org">hcuthair@utemountain.org</a>
Winnebago Tribe of Nebraska	<a href="mailto:frank.white@winnebagotribe.com">frank.white@winnebagotribe.com</a>
Yavapai-Apache Nation of the Camp Verde Indian Reservation, Arizona	<a href="mailto:jrussell-winiecki@yan-tribe.org">jrussell-winiecki@yan-tribe.org</a>
Yavapai-Prescott Indian Tribe	<a href="mailto:ejones@ypit.com">ejones@ypit.com</a>
Coquille Indian Tribe	<a href="mailto:brendameade@coquilletribe.org">brendameade@coquilletribe.org</a>