

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	File Nos.
)	
Level 3 Communications, Inc.)	ITC-T/C-20161213-00343
Transferor,)	ITC-T/C-20161212-00344
)	ITC-T/C-20161212-00345
CenturyLink, Inc.)	ITC-T/C-20161212-00346
Transferee,)	ITC-T/C-20161212-00347
)	ITC-T/C-20161212-00348
Applications for Consent to Transfer Control)	SCL-T/C-20161212-00022
of Domestic and International)	SCL-T/C-20161212-00023
Authorizations Pursuant to Section 214 of)	SCL-T/C-20161212-00024
the Communications Act of 1934, As)	SCL-T/C-20161212-00025
Amended, and Cable Landing License)	WC Docket No. 16-403
Interests Pursuant to the Cable Landing)	
License Act of 1921, as amended)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”), with the concurrence of the Department of Homeland Security (“DHS”) and the Department of Defense (“DOD”; collectively, the “Agencies”), submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, DOJ advises the Commission that the Agencies have no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the commitment of CenturyLink, Inc. (“CenturyLink”) to abide by the undertakings set forth in the September 29, 2017, Letter of Assurances (“2017 LOA”), which is attached hereto as Attachment A. The above-referenced proceedings involve an application seeking Commission approval to transfer control of various licenses and authorizations held by Level 3 Communications Inc. (“Level 3”)

¹ 47 C.F.R. § 1.41.

or its operating subsidiaries to CenturyLink.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of CenturyLink and Level 3 in connection with the above-referenced proceedings, the Agencies have concluded that the commitments set forth in the 2017 LOA will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, DOJ, with the concurrence of DHS and DOD, advises the Commission that it has no objection to the Commission granting the applications in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by CenturyLink with the 2017 LOA.

Respectfully submitted,

/S/ Richard Sofield
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October 2, 2017

Attachment A (2017 Letter of Assurances)