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October 6, 2017

Via Hand Delivery and ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Presentation, WC Docket No. 16-403

Dear Ms. Dortch:

Over the past few months, CenturyLink, Inc. (“CenturyLink”) and Level 3 Communications, Inc. (“Level 3,” and together with CenturyLink, the “Applicants”) have filed information in this docket, which Commission staff has been evaluating. Based on discussions with Commission staff, the Applicants understand that while each of them owns or controls a fiber-based connection to the ten locations identified in Highly Confidential Attachment A [Bates Number CTLLVLT-000185] to this submission, there presently is not sufficiently clear evidence that another service provider owns or controls a fiber-based connection to or within sufficient distance of these locations.

To ensure that customers in these ten locations continue to obtain competitive rates for the services provided by the Applicants following the merger, the Applicants voluntarily commit that rates as of the merger closing date for any service provided by CenturyLink or Level 3 will not be increased for either existing or new customers in these ten locations for five years following the merger closing date, except that the foregoing commitment shall become inoperative as to a particular location if, at any time during the five-year period: (i) the legacy CenturyLink or Level 3 fiber facilities serving the location are divested to an unaffiliated third party; or (ii) an unaffiliated competitive provider deploys service to the location with fiber facilities. For the avoidance of doubt, nothing herein shall restrict the Applicants from lowering rates to any customer at any time.

The Applicants understand that by making this submission and voluntary commitment, they have fulfilled their obligation to provide responsive information to the Commission in connection with its requests in this docket and have addressed in full any related concerns.

The document submitted herewith is Highly Confidential and therefore is marked “HIGHLY CONFIDENTIAL INFORMATION — SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 16-403 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.”

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Consistent with the instructions in the Protective Order in this docket, this Highly Confidential document is being hand-filed, and copies are being provided to Commission staff and will be made available to third parties pursuant to the terms of the Protective Order. The Applicants' redacted submission is marked "REDACTED — FOR PUBLIC INSPECTION" and is being filed electronically in the Commission's Electronic Comment Filing System.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,

/s/

Yaron Dori
Counsel to CenturyLink, Inc.

cc: Terri Natoli
Thomas Jones (Counsel to Level 3)
Mia Guizzetti Hayes (Counsel to Level 3)

Highly Confidential Attachment A [Document CTLLVLT-000185]
is Highly Confidential in its entirety.