



**Melissa Newman**  
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VIA ECFS

October 20, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: *Protecting the Privacy of Customers of Broadband and other Telecommunications Services*, WC Docket No. 16-106

Dear Ms. Dortch:

On October 18 and 20, 2016, Melissa Newman, in person, and Linda Gardner, by phone, both of CenturyLink, met with the FCC in three separate meetings to discuss the recently released Privacy NPRM Fact Sheet. On October 18, they met with Claude Aiken, Legal Advisor to Commissioner Clyburn; on October 20, with Nick Degani, Legal Advisor to Commissioner Pai, and with Travis Litman, Legal Advisor to Commissioner Rosenworcel.

We discussed that the movement to a sensitivity-based opt-in consent model is more aligned with customer expectations and the Federal Trade Commission (FTC) model. We encouraged further alignment with the FTC model by clarifying that opt-in is limited to precise geo-location and that not all web browsing history and app usage history should be included but only that related to the otherwise sensitive categories of health, children, and financial information.

We also discussed our support for a risk of harm-based breach notification trigger and sought clarity regarding the timing and scope of the notification to both customers and the FCC.

Sincerely,

/s/ Melissa Newman

Copy via email to:  
Claude Aiken  
Nick Degani  
Travis Litman