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**REDACTED -- FOR PUBLIC INSPECTION**

*VIA ECFS*

June 15, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *Accelerating Wireline Broadband Deployment by Removing Barriers to  
Infrastructure Investment*, WC Docket No. 17-84

Dear Ms. Dortch:

Enclosed for filing in the above-referenced docket are the non-redacted Comments of CenturyLink. As this submission contains confidential information, it is being filed pursuant to the Commission's FOIA implementation rules, 47 C.F.R. §§ 0.457 and 0.459.<sup>1</sup> Also enclosed with this letter is a Confidentiality Appendix, wherein CenturyLink provides justification for the confidential treatment of its submission.

The non-redacted version of CenturyLink's submission is marked, **CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**, and CenturyLink requests that it be withheld from public inspection and disclosure. CenturyLink is filing two copies of the non-redacted version of its submission, and is also including an extra copy to be stamped as received and returned to the courier. Additionally, CenturyLink is submitting today a redacted version of its Comments via the Electronic Comments Filing System. The redacted version of the submission, from which the confidential information has been omitted, is marked, **REDACTED – FOR PUBLIC INSPECTION**.

This cover letter, which is associated with the non-redacted and redacted versions of CenturyLink's submission, contains no confidential information and the text is the same for both

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<sup>1</sup> 47 C.F.R. §§ 0.457 (2017), 0.459 (2011).

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except for the confidentiality markings and the manner of submission noted in the heading on the first page.

Any questions regarding this correspondence can be directed to the undersigned.

Sincerely,

/s/ Craig J. Brown

Enclosures

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### CONFIDENTIALITY APPENDIX

#### 47 C.F.R. § 0.457

Information included with CenturyLink's Comments on accelerating broadband deployment by removing unnecessary and counterproductive barriers to fiber deployment, as filed on June 15, 2017 in WC Docket No. 17-84, is entitled to confidential treatment under 47 C.F.R. § 0.457.<sup>1</sup>

The type of confidential information being submitted includes (1) a percentage figure for the rate of decline of DS1 special access circuits CenturyLink provided to wireless providers between January of 2012 and December of 2016; and (2) CenturyLink's current market share of voice/data spend for small business customers in its incumbent LEC territory. This information is sensitive commercial and financial information regarding CenturyLink's business operations and service offerings that is not accessible via publicly available sources. The external vendor that provides CenturyLink with this type of market share data also considers the information to be confidential and proprietary. This confidential proprietary commercial and financial information is not routinely available from CenturyLink, nor is it available for public inspection from the Commission and thus is protected from public availability under 47 C.F.R. § 0.457(d).

#### 47 C.F.R. § 0.459<sup>2</sup>

CenturyLink also considers the confidential information submitted with its June 15, 2017 Comments in WC Docket No. 17-84 as protected from public disclosure pursuant to 47 C.F.R. § 0.459(b) as described as follows.

#### Information for which confidential treatment is sought

CenturyLink seeks confidential treatment for information included with its June 15, 2017 Comments, which is sensitive commercial and financial information regarding CenturyLink's business operations and service offerings that is protected from public disclosure and availability.

#### Commission proceeding in which the information was submitted

The Comments are being filed with the Office of the Secretary of the FCC in WC Docket No. 17-84, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*.

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<sup>1</sup> 47 C.F.R. § 0.457 (2017).

<sup>2</sup> 47 C.F.R. § 0.459 (2011).

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The confidential information included with CenturyLink's Comments that it considers commercially and financially sensitive and proprietary includes (1) a percentage figure for the rate of decline of DS1 special access circuits CenturyLink provided to wireless providers between January of 2012 and December of 2016; and (2) CenturyLink's current market share of voice/data spend for small business customers in its incumbent LEC territory.

This information is sensitive commercial and financial information regarding CenturyLink's business operations and service offerings that is not accessible via publicly available sources. The external vendor that provides CenturyLink with this type of market share data also considers the information to be confidential and proprietary. This confidential proprietary commercial and financial information is not routinely available from CenturyLink nor is it available for public inspection from the Commission and thus is protected from public availability under 47 C.F.R. § 0.457(d).

Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm

The type of confidential information included with CenturyLink's Comments would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that its release likely would produce competitive harm. The telecommunications services CenturyLink provides – including the types of high-speed product and service offerings that are described in the Comments – are all competitive. The release of this confidential information would cause competitive harm by allowing competitors to become aware of sensitive commercial and financial information regarding CenturyLink's business and internal operations, and the competitive markets in which CenturyLink operates. The release of the confidential market share information would also cause harm to the vendor that compiles it and makes it available to CenturyLink for a fee on a proprietary basis.

Measures taken to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties

CenturyLink has treated and treats the sensitive commercial and financial information disclosed in its Comments, and has protected it from public disclosure.

Justification of the period during which CenturyLink asserts that the material should not be available for public disclosure

At this time, CenturyLink cannot determine any date on which the sensitive commercial and financial information included with its submission should not be considered confidential.

**REDACTED -- FOR PUBLIC INSPECTION**

Other information that CenturyLink believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable FCC and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.

**REDACTED -- FOR PUBLIC INSPECTION**