



June 29, 2018

Via ECFS

Notice of Ex Parte

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *In re Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks* (WC Docket No. 18-141)

Dear Ms. Dortch:

On June 29, 2018, Craig Brown, Dan Gordon, Glenda Weibel, Dave Williams, and the undersigned of CenturyLink met with Eric Ralph of the Wireline Competition Bureau (WCB) front office and Michele Berlove, Dan Kahn, Pam Megna, and Terri Natoli of WCB's Competition Policy Division to discuss questions from staff regarding the data CenturyLink provided to USTelecom in support of the above captioned petition for forbearance.<sup>1</sup>

Mr. Williams, Director of Product Management for Local Services, and Mr. Gordon, Director of Regulatory Compliance and Analytics, led CenturyLink's discussion of the following issues:

- We described the capabilities of different types of UNE loops sold by CenturyLink, including 2-Wire or 4-Wire Analog (Voice Grade) loops and 2-Wire or 4-Wire Non-Loaded Loops. We noted our understanding that our customers generally purchase analog loops to provide voice service, and digital loops, which have limited or no load coils and bridged taps, to provide data services, including DSL.
- We noted that there are no technical or performance differences between DSx loops that are sold as UNEs and those that are sold as special access or pursuant to other commercial agreements. We further explained that retail and wholesale loops utilize separate ordering and

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<sup>1</sup> *Petition of USTelecom for Forbearance Pursuant to 47 U.S. C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141 (filed May 4, 2018) (Petition).

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billing systems, and that there are operational differences in how the loops are provisioned, such as reporting requirements for UNEs that do not exist for business data services (BDS).

- We explained that CenturyLink does not differentiate between analog and digital DSOs in its pricing. CenturyLink provisions somewhat fewer DSO UNE loops than industry average, but the split of services in CenturyLink's territory follows the industry split set forth in the economic study submitted with the Petition.
- We explained that the states CenturyLink chose as data sources for the economic study are representative of CenturyLink's overall service territory, including rural and urban areas and areas subject to varying levels of competition. Those states represent a sizeable minority of CenturyLink's total UNE loop demand, and over half of its EEL demand.
- We explained that CenturyLink has not discontinued the provision of DSL in any market where it has been made available, and we are not aware of any case in which a carrier customer is utilizing UNEs purchased from CenturyLink to provide DSL in areas where CenturyLink itself does not provide DSL.

Finally, we offered to discuss any further questions the staff may have in connection with the Petition.

Please do not hesitate to contact me with any questions on this matter.

Best regards,

/s/ Nicholas G. Alexander

Nicholas G. Alexander  
Associate General Counsel  
CenturyLink, Inc.

cc: Michele Berlove  
Dan Kahn  
Pam Megna  
Terri Natoli  
Eric Ralph