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BEIJING BRUSSELS DUBAI JOHANNESBURG LONDON
LOS ANGELES NEW YORK SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 6000

July 12, 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:

On June 19, 2017, representatives of CenturyLink, Inc. (“CenturyLink”) and Level 3 Communications, Inc. (“Level 3,” and together with CenturyLink, the “Applicants”) reported that they spoke by telephone with the staff of the Commission’s Wireline Competition Bureau (the “Bureau”) and Office of General Counsel, during which time the Applicants expressed their intent to clarify certain of their responses to the Bureau’s Information and Document Requests issued on March 30, 2017, in the above-referenced docket.¹

In furtherance of that discussion, and to supplement the Applicants’ response to RFI Number 2, which sought information and documentation pertaining to the effect of the transaction on competition in the provision of long-haul fiber, the Applicants are submitting herewith the following Highly Confidential documents and supporting exhibits:

1. Information for each long-haul route in which Level 3 offered, offers, or currently leases dark fiber to another provider specifying (1) the name of route; (2) the names of the other provider(s) offering dark fiber on that route; and (3) for each such provider on that route that leases dark fiber from Level 3 or CenturyLink on a short-

¹ See Notice of *Ex Parte* Presentation, WC Docket No. 16-403 (filed June 19, 2017); see also *Applications Filed for the Transfer of Control of Level 3 Communications, Inc. to CenturyLink, Inc.*, Letter from Madeleine V. Findley, Wireline Competition Bureau, to Thomas Jones et al., Counsel for Level 3 Communications, Inc., and Yaron Dori et al., Counsel for CenturyLink, Inc., DA 17-296, WC Docket No. 16-403 (Mar. 30, 2017) (“RFI”).

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term lease or IRU basis, the amount of capacity leased to that provider and, where available, the time remaining on the lease or IRU.

2. Information for each of the 52 overlapping long-haul fiber routes owned or controlled by the Applicants, as identified in the Applicants' April 13, 2017 Further Joint Response to the Bureau's Information and Document Requests, that specifies (1) the name of each competitor leasing fiber from CenturyLink or Level 3 via a short-term lease or IRU on that route; and (2) the amount of capacity leased and, where available, the time remaining on the lease or IRU.²

The documents submitted herewith are Highly Confidential and therefore are marked "HIGHLY CONFIDENTIAL INFORMATION — SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 16-403 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." 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 submissions are marked "REDACTED — FOR PUBLIC INSPECTION" and are being filed electronically in the Commission's Electronic Comment Filing System.

² Bates Numbers CTLLVLT-000148 through CTLLVLT-000153.

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

Respectfully submitted,

/s/

Yaron Dori
Brandon Johnson
Ani Gevorkian
Counsel to CenturyLink, Inc.

cc: Daniel Kahn
Terri Natoli
Virginia Metallo
Pam Megna
Mike Ray
Zach Ross
Joel Rabinovitz
Darren Fernandez
Thomas Jones (Counsel to Level 3)
Mia Guizzetti Hayes (Counsel to Level 3)

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