

COVINGTON

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 26, 2017

Via Hand Delivery and ECFS

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

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

Dear Ms. Dortch:

On July 24, 2017, I spoke by telephone with Terri Natoli and Virginia Metallo of the Commission's Wireline Competition Bureau to provide an update related to certain calculations that were contained in CenturyLink Inc.'s July 5, 2017, Highly Confidential supplemental response to RFI Number 5, which sought information and documentation pertaining to the efficiencies and synergies resulting from the proposed transaction.¹ During our call, Ms. Metallo sought clarification regarding a figure that was included in that July 5th submission.

Highly Confidential Attachment A to this submission [Bates Number CTL-000457] describes the update I provided in the July 24th telephone conversation and clarifies the figure in the July 5th submission that Ms. Metallo referenced.

¹ See CenturyLink, Inc., Notice of *Ex Parte* Presentation, WC Docket No. 16-403 (filed July 5, 2017); see also Further Joint Response of CenturyLink, Inc. and Level 3 Communications, Inc. to Information and Document Requests, WC Docket No. 16-403 (filed Apr. 13, 2017); Response of CenturyLink, Inc. to Information and Document Requests, WC Docket No. 16-403 (filed Apr. 13, 2017); Response of Level 3 Communications, Inc. to Information and Document Requests, WC Docket No. 16-403 (filed Apr. 13, 2017); Initial Joint Response of CenturyLink, Inc. and Level 3 Communications, Inc. to Information and Document Requests, WC Docket No. 16-403 (filed Apr. 7, 2017); *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").

COVINGTON

Letter to Ms. Dortch
July 26, 2017
Page 2

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.” 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.

Pursuant to the Commission’s rules, a copy of this notice is being filed in the above-referenced docket. Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,

/s/

Yaron Dori
Counsel to CenturyLink, Inc.

cc: Terri Natoli
Virginia Metallo
Darren Fernandez
Thomas Jones (Counsel to Level 3) (cover letter only)
Mia Guizzetti Hayes (Counsel to Level 3) (cover letter only)

Attachment A [Bates Number CTL-000457]
is Highly Confidential in its entirety.