

# COVINGTON

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August 4, 2017

## Via 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:

In various submissions filed in this proceeding, CenturyLink, Inc. (“CenturyLink”) and Level 3 Communications, Inc. (“Level 3,” and together with CenturyLink, the “Applicants”) have reported that a fiber-based competitor is located within 0.1 mile of a significant number of 2-1 locations in CenturyLink’s ILEC region.<sup>1</sup> In response to a request from the staff of the Commission’s Wireline Competition Bureau (the “Bureau”), the Applicants submit herein Highly Confidential data [Bates Number CTLLVLT-000155] demonstrating the extent to which demand in those locations meets or exceeds the approximate equivalent of two DS-3 circuits.<sup>2</sup>

The document submitted herewith is Highly Confidential and therefore is marked “HIGHLY CONFIDENTIAL INFORMATION — SUBJECT TO PROTECTIVE ORDER IN

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<sup>1</sup> See, e.g., Initial Joint Response of CenturyLink, Inc. and Level 3 Communications, Inc. to Information and Document Requests at 5-7, WC Docket No. 16-403 (filed Apr. 7, 2017); Joint Reply Comments of CenturyLink, Inc. and Level 3 Communications, Inc. at 5-6, WC Docket No. 16-403 (filed Feb. 7, 2017); Consolidated Application to Transfer Control of Domestic and International Section 214 Authorizations at B-18 to B-20, WC Docket No. 16-403 (filed Dec. 12, 2016).

<sup>2</sup> The most recent location analysis submitted by the Applicants demonstrates that there are a total of 529 2-1 locations in which a fiber-based competitor is not at the location, but is within 0.1 mile of that location. The Applicants are submitting herewith Highly Confidential demand data for 454 of those 2-1 locations. Of these locations, the data being submitted shows that demand in these locations meets or exceeds the approximate equivalent of two DS-3 circuits in 452, or 99.6 percent, of these 454 locations. Applicants are continuing to collect demand data for the remaining 75 locations and expect to supplement this submission with that information shortly.

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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.

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: Terri Natoli  
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Document CTLLVLT-000155 has been produced in native Excel format and is Highly Confidential in its entirety.