

## 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

August 22, 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 August 4, 2017, CenturyLink, Inc. (“CenturyLink”) and Level 3 Communications, Inc. (“Level 3,” and together with CenturyLink, the “Applicants”) submitted Highly Confidential data [Bates Number CTLLVLT-000155] demonstrating the extent to which demand for BDS meets or exceeds the equivalent of two DS-3 circuits in certain 2:1 locations in CenturyLink’s ILEC region.<sup>1</sup> The *ex parte* presentation accompanying the August 4th submission explained that the Applicants previously had identified a total of 529 2:1 locations in which a fiber-based competitor is located within 0.1 mile.<sup>2</sup> The August 4th submission provided demand data for 454 of those locations.<sup>3</sup>

In this submission, the Applicants are filing a Highly Confidential spreadsheet [Bates Number CTLLVLT-000161] that provides demand data for the 75 remaining 2:1 locations that were not included in the August 4th submission. For convenience, the Applicants also are resubmitting the demand data provided in their August 4th submission so that demand data for all 529 2:1 locations can be found in one file.<sup>4</sup> The data submitted herewith demonstrates that 94

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<sup>1</sup> See Notice of *Ex Parte* Presentation, WC Docket No. 16-403 (filed Aug. 4, 2017).

<sup>2</sup> *Id.* at 1 n.2.

<sup>3</sup> *Id.*

<sup>4</sup> The data provided in the tab labeled “Submitted 454” is identical to the Highly Confidential data [Bates Number CTLLVLT-000155] submitted on August 4th except for one address (row 456) in which calculations have been updated to show that demand now exceeds the approximate equivalent of two DS-3 circuits.

**COVINGTON**

Letter to Ms. Dortch  
August 22, 2017  
Page 2

percent of the 529 2:1 locations that the Applicants previously had identified have demand that meets or exceeds two DS-3 circuits or are stand-alone cell towers or DSLAM locations.<sup>5</sup>

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.

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  
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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<sup>5</sup> Since identifying these 529 2:1 locations, the Applicants have determined that 31 of them are either a stand-alone cell tower or DSLAM location, and that two of those 31 locations consist of a stand-alone cell tower at a DSLAM location.

REDACTED — FOR PUBLIC INSPECTION

Document CTLLVLT-000161 has been produced in native Excel format and is Highly Confidential in its entirety.