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**REDACTED – FOR PUBLIC INSPECTION**

August 29, 2016

**VIA ECFS**

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

Re: *Business Data Services in an Internet Protocol Environment et al., WC Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

Pursuant to the procedures outlined in the *Modified Protective Order, Second Protective Order, and Data Collection Protective Order* in the above-referenced proceedings, Frontier and CenturyLink herein submit a redacted version of the attached *ex parte* in the above-referenced proceedings.

Frontier and CenturyLink have designated for confidential treatment the marked portions of the attached documents pursuant to the *Data Collection Protective Order*,<sup>1</sup> *Second Protective Order*,<sup>2</sup> and *Data Collection Protective Order*<sup>3</sup> in WC Docket No. 05-25 and RM-10593.

Pursuant to the protective orders and additional instructions from Commission staff, Frontier and CenturyLink are filing a redacted version of the document electronically via ECFS, one copy of the Confidential version with the Secretary, and sending two copies of the Confidential version to Christopher Koves, Pricing Policy Division, Wireline Competition Bureau.

Please contact me if you have any questions or require any additional information

Sincerely,

Mike Saperstein

Enclosure

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers, Modified Protective Order, DA 10-2075, 25 FCC Rcd 15168 (Wireline Comp. Bur. 2010).*

<sup>2</sup> *Special Access for Price Cap Local Exchange Carriers, Second Protective Order, DA 10-2419, 25 FCC Rcd 17725 (Wireline Comp. Bur. 2010).*

<sup>3</sup> *Special Access for Price Cap Local Exchange Carriers, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd 11657 (Wireline Comp. Bur. 2015).*



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Dear Ms. Dortch:

On August 25, 2016, Bill Cheek, Jeff Glover, John Jones and Melissa Newman of CenturyLink, and Kathleen Abernathy and I of Frontier Communications, met with Matt DelNero, Bureau Chief, and Deena Shetler, Associate Bureau Chief, and Eric Ralph, Chief Economist (via telephone), of the Wireline Competition Bureau, to discuss the proceeding referenced above.

CenturyLink and Frontier used the attached presentation (Attachment A) to discuss the ways in which proposals raised by the Commission and other parties, including Verizon and Incompas,<sup>1</sup> do not synch with market realities and would produce results that are generally not administrable but, if implemented, would be deeply harmful to investment in American broadband connectivity. CenturyLink and Frontier also referenced the news articles (Attachment B) describing analyst reports and to emphasize the competitive nature of the Business Data Service (BDS) market. These articles demonstrate the impact that the BDS proposals have had on their companies and ultimately may have on their customers and employees.

Sincerely,

Mike Saperstein

cc: Matt DelNero  
Eric Ralph  
Deena Shetler

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<sup>1</sup> Letter from Kathleen Grillo, Senior Vice President, Verizon, and Chip Pickering, Chief Executive Officer, INCOMPAS, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 16-143, 05-25, RM 10593 (filed Aug. 9, 2016).