

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

September 5, 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 the presence of fiber-based competitors in proximity to 2-1 overlap locations in CenturyLink’s ILEC region.¹ In response to a request from the staff of the Commission’s Wireline Competition Bureau, the Applicants submit herein Highly Confidential data [Bates Number CTLLVLT-000179] containing demand information for 206 of those 2-1 locations.²

¹ See *Ex Parte* Presentation Letter from Yaron Dori to Marlene Dortch, WC Docket No. 16-403 (filed August 15, 2017); *Ex Parte* Presentation Letter from Yaron Dori to Marlene Dortch, WC Docket No. 16-403 (filed July 5, 2017); 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).

² This demand information supplements the information the Applicants filed previously. See *Ex Parte* Presentation Letter from Yaron Dori to Marlene Dortch, WC Docket No. 16-403 (filed August 22, 2017); *Ex Parte* Presentation Letter from Yaron Dori to Marlene Dortch, WC Docket No. 16-403 (filed August 4, 2017). References in CTLLVT-000179 to the provision of Wavelength service are based on the presence of Wavelength equipment at the location. Although the Applicants are in the process of verifying that Wavelength service is being provided at the location, the Applicants believe that, given the cost of this equipment and the ability to move it to another location, this equipment would not be present absent the provision of Wavelength service at the location. References to “Stand-Alone ILA” in CTLLVT-000179 refer to locations in which “Intermedia Light Amplification” equipment is present. The Applicants believe that the competitive significance of locations with this equipment is akin to locations that contain stand-alone DSLAMs.

REDACTED — FOR PUBLIC INSPECTION

COVINGTON

Letter to Ms. Dortch
September 5, 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.

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)

REDACTED — FOR PUBLIC INSPECTION

Document CTLLVLT-000179 has been produced in native Excel format and is Highly Confidential in its entirety.