

Sandra Gray-Fields

From: Lia Royle
Sent: Tuesday, September 18, 2018 11:36 AM
To: Sandra Gray-Fields
Subject: FW: CenturyLink Communications LLC v. Verizon, Docket 18-33, File EB-18-MD-001

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**Federal Communications Commission
Office of the Secretary**

From: Lia Royle
Sent: Monday, September 17, 2018 2:27 PM
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Cc: Rosemary McEnery <Rosemary.McEnery@fcc.gov>; Erin Boone <Erin.Boone@fcc.gov>
Subject: CenturyLink Communications LLC v. Verizon, Docket 18-33, File EB-18-MD-001

Dear Counsel:

It appears from CenturyLink's September 13, 2018 email and our September 6, 2018 phone conference with the parties to discuss discovery, that the parties have resolved all discovery disputes except CenturyLink Interrogatory number 7 and Verizon Interrogatory number 4, as to which the parties, according to CenturyLink's email, "remain at an impasse." CenturyLink's email also states that "the parties jointly propose that their response period on discovery requests be thirty (30) days from the date of any Staff order resolving outstanding discovery, but in no event sooner than October 19, 2018."

Staff discussed the two outstanding interrogatories with the parties during the September 6, 2018 phone conference and suggested that the parties attempt to reach an agreement between themselves. Because the parties are unable to settle their dispute, we now address these two discovery requests:

CenturyLink's Interrogatory number 7 is denied. Among other reasons, the record on this issue is already extensively developed, and Verizon has agreed to answer other interrogatories providing information similar to the information sought in Interrogatory number 7.

Verizon's Interrogatory number 4 is denied. Among other reasons, the request is unduly burdensome. CTL states that it will require approximately eighty hours to complete the analysis required to respond to this request; yet the record in this case is already extensive, so that the information requested is not necessary to the resolution of the dispute.

As requested by the parties, discovery responses are due **October 19, 2018**.

Thank you,

Lia and Erin

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