



CenturyLink™

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EX PARTE

December 7, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Restoring Internet Freedom*, WC Docket No. 17-108

Dear Ms. Dortch:

On Tuesday, December 5, 2017, Joe Cavender and I, on behalf of CenturyLink, met with Jamie Susskind, Chief of Staff for Commissioner Carr, and Amy Bender, Legal Advisor to Commissioner O'Reilly, and Claude Aiken, Legal Advisor to Commissioner Clyburn, all regarding the above-captioned matter. On Wednesday, December 6, 2017 Mr. Cavender and I met with Travis Litman, Chief of Staff for Commissioner Rosenworcel, also regarding the above-captioned matter. In the meetings, we made the following points.

CenturyLink is pleased to see the Commission moving forward to bring additional clarity for consumers and providers to the open internet debate, and we support policies that will drive innovation, investment and job creation in our global internet economy. CenturyLink's network will play an important role in that process, and we look forward to working with the Commission to ensure that the internet experience of consumers and businesses, including the exchange of internet traffic between providers, remains positive and beneficial overall.

CenturyLink believes the Commission should not relinquish authority over Internet traffic exchange arrangements, sometimes called interconnection or peering agreements. Should the Commission adopt an Order reclassifying broadband internet access service as a Title I information service and assert Title I jurisdiction over internet traffic, the Commission should also clearly state that it can and will be available to resolve significant issues related to the associated policies and rules that give rise to such Title I jurisdiction. For example, should the issue arise, the Commission alone is able to determine whether terminating access charges for internet traffic would be consistent with the public interest for the underlying telecommunications and associated voice communications, its obligation to

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encourage the deployment of advanced telecommunications capability, and to ensure that other jurisdictions do not adopt conflicting policies.

Finally, CenturyLink emphasized that the exchange of Internet traffic should occur through commercial negotiation. Such negotiation seldom succeeds in a vacuum, however, so it is important for the Commission to serve as a backstop so that negotiations can produce commercially reasonable agreements reflecting the interests of the parties, consistent with law and the public interest.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced docket. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey D. Lang". The signature is fluid and cursive, with a horizontal line at the end.

Copies via email to:
Claude Aiken
Amy Bender
Travis Litman
Jamie Susskind