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REDACTED – FOR PUBLIC INSPECTION

Via ECFS

October 24, 2014

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

Re: *In the Matter of CenturyLink’s Petition for Forbearance Pursuant to 47 U.S.C. §160(c) from Dominant Carrier and Certain Computer Inquiry Requirements on Enterprise Broadband Services, WC Docket No. 14-9 – Supplemental Response to September 12, 2014 Request Regarding Answers to Questions 2-13*

Dear Ms. Dortch:

On October 14, 2014, CenturyLink submitted in the above-referenced proceeding material responsive to Questions 2 through 13 of the Wireline Competition Bureau’s September 12, 2014 Information, Data and Document Request.¹ The material provided in answer to Questions 2 through 13 included highly confidential information, confidential information and public information in the form of narrative and attached documents. The highly confidential information is the proprietary commercial and financial information of CenturyLink that is

¹ Letter from Julie A. Veach, FCC, to Craig J. Brown, CenturyLink, Attachment I, pp. 2-5 (Sept. 12, 2014). Answers to Questions 1 and 14 were filed on October 3, 2014. The non-redacted version of the October 14, 2014 submission was made that day in hard copy (with an accompanying CD) to the Secretary’s office. The redacted version of the October 14, 2014 submission was not filed until October 15, 2015 because of the Electronic Comment Filing System’s (ECFS) inability to accept uploaded filings on the evening of October 14, 2014 (as is detailed in the October 15, 2014 cover letter associated with CenturyLink’s redacted submission).

entitled to highly confidential treatment and protection from public disclosure. It also includes highly confidential information of third-party vendors. Although the highly confidential and confidential information is specifically protected from disclosure pursuant to the terms of the Second Protective Order² and Protective Order,³ both adopted in this proceeding, attached to the October 14, 2014 correspondence was an Appendix in which CenturyLink provided separate justification for highly confidential and confidential treatment under 47 C.F.R. §§ 0.457, 0.459.

Included with the October 14, 2014 submission were Attachments 4A, 6A, 6B, 7A, 7B, 9A and 10A. All of these attachments included information that CenturyLink considers to be highly confidential as was described in the Appendix and associated October 14, 2014 correspondence. By today's submission, as requested by the Wireline Competition Bureau staff, CenturyLink is submitting new versions of Attachments 4A, 6B, 7A, 7B, 9A and 10A, which now show the names of the customers associated with the data provided in each attachment. A new version of Attachment 6A is also being submitted today because CenturyLink subsequently became aware of a spacing problem with the illustration of the data in this attachment. For all of the Attachments being submitted today, none of the data contained therein has been altered or supplemented as to its substantive content beyond the addition of the customer names.

CenturyLink notes that the attachments being submitted today continue to include highly confidential information and are protected from disclosure pursuant to the terms of the Second Protective Order in WC Docket No. 14-9. And, CenturyLink points out that the customer name information being provided today is among the types of highly confidential information specifically covered in Appendix A (as revised) to the Second Protective Order and which is thus entitled to protection from public disclosure.⁴ CenturyLink requests that the Confidentiality Justification appended to its October 14, 2014 submission (along with the explanation for confidential treatment contained in the associated correspondence), which is incorporated herein by reference, apply to today's submission. Additionally, CenturyLink notes that its customers may also consider this information proprietary and competitively sensitive and thus its release could cause competitive harm to both CenturyLink and its customers.⁵

² 29 FCC Rcd 2200 (2014). *See also* Letter from Julie A. Veach, FCC to Craig J. Brown, CenturyLink, DA 14-1338 (Sept. 16, 2014), revising Appendix A to the Second Protective Order, and Erratum, DA 14-1384 (Sept. 24, 2014).

³ DA 14-37 (Jan. 14, 2014).

⁴ *See* Erratum, WC Docket No. 14-9, Appendix A (rel. Sept. 24, 2014), Highly Confidential Information and Documents, *e.g.*, items 5 and 6.

⁵ Prior to making today's submission, CenturyLink contacted the customers whose names are identified in Attachments 4A, 6B, 7A, 7B, 9A and 10A to give them an opportunity to object to the disclosure of their customer-specific information.

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Consistent with the highly confidential nature of the information provided in Attachments 4A, 6A, 6B, 7A, 7B, 9A and 10A, as required by the Second Protective Order, this information is marked “**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 14-9 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING RESTRICTED**”.

Pursuant to the Second Protective Order, CenturyLink is submitting to the Secretary’s office one copy of the non-redacted version of its submission with the highly confidential information (a hard copy of this cover letter and one CD). Additionally as required by the Second Protective Order, CenturyLink is separately providing two copies of the non-redacted version with the highly confidential information to Matt Warner of the Competition Policy Division of the Wireline Competition Bureau (two hard copies of this cover letter and two CD copies).

CenturyLink is also submitting today under separate cover, via the ECFS, a redacted version of this submission. The redacted submission is marked “**REDACTED – FOR PUBLIC INSPECTION,**” with the highly confidential information omitted.⁶

This letter includes no highly confidential information and the text is the same for both the non-redacted and redacted versions except for the confidentiality markings, the manner of submission noted in the heading on the initial page and the reference to the enclosure for the non-redacted.

Please contact me via the above contact information or Melissa Newman in CenturyLink’s Federal Regulatory Affairs office (202-429-3120) if you have any questions.

Sincerely,

/s/ Craig J. Brown

cc: Matt Warner (two copies of non-redacted submission)

⁶ Inasmuch as the redacted versions of Attachments 4A, 6A, 6B, 7A, 7B, 9A and 10A being filed today would not vary as to form and content from the versions submitted by CenturyLink on October 14, 2014, CenturyLink is not filing the attachments again today via ECFS.

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