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**REDACTED – FOR PUBLIC INSPECTION**

**Via Courier**

November 5, 2014

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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*

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.<sup>1</sup> Based on further discussions with the Wireline Competition Bureau staff, CenturyLink submits the following:

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<sup>1</sup> 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, 2014 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). CenturyLink also filed a supplemental response to the September 12, 2014 Request on October 24, 2014. And, CenturyLink filed supplemental information and a corrected attachment on October 31, 2014.

- **Revised Attachment 5.B.** Through further investigation, CenturyLink has identified a more accurate source of data in response to Question 5(b) of the September 12 Data Request.<sup>2</sup> The results of that investigation are reflected in Revised Attachment 5.B, which replaces the version of that attachment submitted on October 14, 2014.
- **Attachment 11.B.** This information supplements CenturyLink's October 14 response to Question 11 of the September 12 Data Request.<sup>3</sup> In particular, Attachment 11.B identifies the number of commercial buildings in each exchange covered by CenturyLink's Petition to which the company provides any of the following defined services (on either a retail or wholesale basis): DS1, DS3, OCx, Ethernet, Asynchronous Transfer Mode (ATM), Frame Relay, Centrex, Private Branch Exchange (PBX), Key,<sup>4</sup> or unbundled network element (UNE) loops. In an effort to identify unique buildings, CenturyLink geocoded the addresses to which these services are offered and eliminated those with duplicate coordinates.

This submission includes highly confidential information in the form of narrative and attached documents. The highly confidential information is the proprietary commercial information of CenturyLink that is entitled to protection from public disclosure. Although the highly confidential information is specifically protected from disclosure pursuant to the terms of the Second Protective Order<sup>5</sup> adopted in this proceeding, attached to the October 14, 2014

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<sup>2</sup> Question 5(b) asked CenturyLink to provide "the number of commercial buildings in which a competitor has purchased a **UNE** or **UNEs** from CenturyLink [emphasis in original]."

<sup>3</sup> Question 11 requested the following: "For each exchange in a study area for which CenturyLink seeks relief, provide the total number of physical addresses to which you provide business services, excluding: sales of **UNEs**; standalone sales of PSTN voice services; standalone sales of 'best-effort' Internet services (for example, as typically marketed to residential customers); standalone sales of any bundle of PSTN voice services and 'best-effort' Internet services (for example, as typically marketed to residential customers); and sales of any interexchange lines, for the 12 months ending December 31, 2012 and December 31, 2013. To the extent CenturyLink contends, however, that 'best-efforts' Internet services provided as business services or otherwise are relevant to assessing competition for provision of Listed Services, please provide the total number of physical addresses to which you provide such services [emphasis in original]."

<sup>4</sup> Key service is similar to Centrex or PBX service.

<sup>5</sup> 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).

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.

In particular, CenturyLink notes that Attachments 5.B (revised) and 11.B being submitted today include highly confidential information that is protected from disclosure pursuant to the terms of the Second Protective Order in WC Docket No. 14-9. And, these Attachments' building-related information 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.<sup>6</sup> 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.

Consistent with the highly confidential nature of the information provided in Attachments 5.B (revised) and 11.B, 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, a hard copy of the index 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, along with two hard copies of the index, 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.

The text of this letter is the same for both the non-redacted and redacted versions except for the confidentiality markings and the manner of submission noted in the heading on the initial page.

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<sup>6</sup> See Erratum, WC Docket No. 14-9, Appendix A (rel. Sept. 24, 2014), Highly Confidential Information and Documents, *e.g.*, items 5 and 8.

Ms. Marlene H. Dortch

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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

Enclosures

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

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