

December 16, 2014

**VIA ECFS**

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

Re: *Ex Parte Presentation in CenturyLink's Petition for Forbearance Pursuant to 47 U.S.C. § 160(c) from Dominant Carrier and Computer Inquiry Tariffing Requirements on Enterprise Broadband Services and CenturyLink's Alternative Petition for Interim Waiver of Dominant Carrier Regulation and Computer Inquiry Tariffing Requirements Imposed on Enterprise Broadband Services (WC Docket No. 14-9)*

Dear Ms. Dortch:

Melissa Newman of CenturyLink and the undersigned of Wilkinson Barker Knauer, LLP met with Rebekah Goodheart, Wireline Legal Advisor to Commissioner Clyburn, on December 15, 2014 to discuss the above-referenced matters.

During the meeting, we reiterated CenturyLink's positions set forth in the record. We explained the difficulties CenturyLink encounters as a result of the current regulatory framework, under which CenturyLink faces tariffing and network-sharing obligations that have never applied to non-incumbents and from which other larger and smaller incumbents have received forbearance relief. This disparity places CenturyLink in an extremely difficult position as it seeks to win and retain enterprise customers requiring service to multiple premises.

We explained that well settled precedent prohibits inequitable distinctions of this type and warrants forbearance, under the same legal standard that has applied to all prior applicants seeking the same relief. We emphasized that Commission resolution of this matter need not

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prejudge any issues pending before the Commission in industry-wide rulemakings and reiterated that the company seeks here only to be subjected to the same framework that governs other providers of enterprise broadband services.

Respectfully submitted,  
/s/ Bryan N. Tramont  
Bryan N. Tramont

cc: Rebekah Goodheart