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REDACTED – FOR PUBLIC INSPECTION

Via ECFS

January 13, 2015

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*

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 which was followed by several supplemental responses and clarifications.²

¹ Letter from Craig J. Brown, CenturyLink, to Marlene H. Dortch, WC Docket No. 14-9 (Oct. 14, 2014) (October 14 Response).

² Letter from Julie A. Veach, FCC, to Craig J. Brown, CenturyLink, Attachment I, pp. 3-5 (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 filed supplemental responses to the September 12, 2014 Request on October 24, October 31, November 5 and November 20, 2014.

Based on further discussions with the Wireline Competition Bureau staff, CenturyLink submits the following:

- **Revised Attachment 12-13B** (Bates No. CENTURLINK0001309). In Attachment 12-13B, CenturyLink provided information related to sales opportunities of our Wholesale organization. As requested by Bureau staff, CenturyLink has excluded in Revised Attachment 12-13B those opportunities related to Qwest Corporation's services and service territories.

The remaining data in Revised Attachment 12-13B differs somewhat for CenturyLink's CenturyTel and Embarq affiliates. For CenturyTel, the revised attachment includes revenues only from CenturyTel services for which CenturyLink is seeking relief. For Embarq, however, the attachment may, in some cases, include revenues from Embarq services for which CenturyLink already has forbearance – specifically Embarq's SONET, Ethernet Private Line, Frame Relay and ATM services (hereinafter referred to as "Embarq forborne services") – as well as those Embarq services for which CenturyLink is seeking relief.

We have not been able to find a way to exclude all opportunities for Embarq forborne services, because the relevant CenturyLink system does not systematically distinguish between CenturyLink's CenturyTel and Embarq affiliates. Thus, in order to capture opportunities related to CenturyTel's Ethernet Private Line service, for example, the report also generally includes opportunities related to the same service provided by Embarq. However, we have been able to exclude some opportunities related to Embarq forborne services, to the extent they contain information identifying them as related to one or more of those services.

As noted in the October 14 Response, the information in Attachment 12-13B (as well as Revised Attachment 12-13B) was pulled from the Salesforce.com records maintained by sales professionals in CenturyLink's Wholesale group in the ordinary course of business. Particular entries vary significantly in terms of completeness.

This submission includes highly confidential information in the attached document. That 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 in WC Docket No. 14-9 adopted in this proceeding,³ CenturyLink included in the October 14

³ 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).

response an Appendix providing separate justification for highly confidential (and confidential) treatment under 47 C.F.R. §§ 0.457, 0.459.

In particular, CenturyLink notes that Revised Attachment 12-13B being submitted today includes highly confidential information that is granular information about sales and revenues, which 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.

Consistent with the highly confidential nature of the information provided in Revised Attachments 12-13B, 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, along with 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, which contains no highly confidential information, 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.

⁴ See Erratum, WC Docket No. 14-9, Appendix A (rel. Sept. 24, 2014), Highly Confidential Information and Documents, *i.e.*, item 3.

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

Enclosure

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

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