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Via ECFS

January 21, 2015

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

Re: *In the Matter of Petition of CenturyLink 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 Information 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

Based on further discussions with the Wireline Competition Bureau staff, CenturyLink provides the following additional information regarding its responses to the September 12 Request:

¹ Letter from Craig J. Brown, CenturyLink, to Marlene H. Dortch, FCC, 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) (September 12 Request). 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, November 20, 2014 and January 13, 2015.

- **Revenue Data.** In response to Questions 6 and 7, CenturyLink submitted retail and wholesale revenue data for 2012 and 2013 for its Ethernet, SONET and ATM/Frame Relay services.³ As CenturyLink noted in its submission, it maintains and reports this information to company management at the state level, and, accordingly, it did the same in response to Questions 6 and 7, specifically for the combined CenturyTel and Embarq areas in which CenturyLink seeks relief.⁴ CenturyLink clarifies here that this means that the retail revenues in Attachments 6A and 7A include intrastate revenues, and the wholesale revenues in Attachments 6B and 7B include revenues for Embarq services already subject to forbearance (*e.g.*, Ethernet Private Line, SONET, ATM/Frame Relay). Due to systems limitations, CenturyLink cannot uniformly exclude revenues for intrastate and forborne services and therefore did not attempt to do so in these Attachments.
- **RFP Data.** In response to Questions 12 and 13, CenturyLink submitted retail and wholesale revenue data related to requests for proposals (RFPs) and other sales opportunities to which it has responded since January 1, 2012.⁵ This information was pulled from Salesforce.com records that are used by CenturyLink's Retail and Wholesale groups to track sales opportunities.⁶ On January 13, 2015, CenturyLink submitted a revised attachment related to its wholesale opportunities during this period.⁷

With respect to the retail information provided in Attachment 12-13A, CenturyLink clarifies that this Attachment includes sales opportunities for intrastate, as well as interstate, services, along with some opportunities addressed by CenturyLink's CLEC affiliate. Given limitations in the data, CenturyLink cannot uniformly exclude these intrastate and CLEC entries. As noted in the October 14 Response, the quality and completeness of the data vary significantly, as sales people generally input the minimum amount of information to get the sales process moving.

³ See October 14 Response, Attachments 6A, 6B, 7A, 7B. Attachments 6A and 6B (Bates Nos. CENTURYLINK0001246 and CENTURYLINK0001247) identified these revenues by customer category, while Attachments 7A and 7B (Bates Nos. CENTURYLINK0001248 and CENTURYLINK0001249) listed them for CenturyLink's Top 20 retail and wholesale customers, excluding competitive local exchange carriers (CLECs).

⁴ See October 14 Response at 6, 7.

⁵ See October 14 Response, Attachments 12-13A and 12-13B (addressing retail and sales opportunities, respectively) (Bates Nos. CENTURYLINK0001253 and CENTURYLINK0001254).

⁶ See October 14 Response at 11.

⁷ Letter from Craig J. Brown, CenturyLink, to Marlene H. Dortch, FCC, WC Docket No. 14-9, Revised Attachment 12-13B (Jan. 13, 2015) (Bates No. CENTURYLINK0001309).

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In any case, it is unnecessary for the Commission to review retail RFP data to confirm that current asymmetric regulation of CenturyLink's enterprise broadband services hampers its ability to compete effectively. Revised Attachment 12-13B, as well as Attachment 7B, provides ample evidence documenting CenturyLink's difficulties in responding effectively to RFPs for enterprise broadband services, which are more frequently issued by wholesale customers, such as national wireless providers. Ultimately it is consumers who suffer from the stunted competition perpetuated by this unnecessary and outdated regulation.

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

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