

February 20, 2015

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:

Representatives of CenturyLink recently held five meetings with Commission personnel to discuss the above-referenced matters:

- Steven R. Davis, Executive Vice President for Public Policy and Government Relations, and Melissa Newman, Senior Vice President, Federal Regulatory Affairs, met with Commissioner Rosenworcel and Travis Litman, Legal Advisor to Commissioner Rosenworcel, on February 19, 2015;
- Mr. Davis, Ms. Newman and the undersigned of Wilkinson Barker Knauer, LLP met with Jonathan Sallet, General Counsel, and Madeleine Findley, Associate General Counsel, on February 19, 2015;
- Ms. Newman and the undersigned met with Commissioner Clyburn, Rebekah Goodheart, Legal Advisor to Commissioner Clyburn, and Carter McMillan, an intern with Commissioner Clyburn's office, on February 20, 2015;
- Ms. Newman and the undersigned met with Nicholas Degani, Legal Advisor to Commissioner Pai, on February 20, 2015; and

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- Mr. Davis, Ms. Newman and the undersigned met with Commissioner O’Rielly and Amy Bender, Legal Advisor to Commissioner O’Rielly, on February 20, 2015.

During these meetings, 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 with regard to enterprise broadband services 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, from application of the relevant rules to permit CenturyLink to operate on the same terms as its competitors. We emphasized that Commission resolution of this matter need not prejudice 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: Commissioner Clyburn
Commissioner Rosenworcel
Commissioner O’Rielly
Jonathan Sallet
Rebekah Goodheart
Travis Litman
Nicholas Degani
Amy Bender
Madeleine Findley
Carter McMillan