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REDACTED – FOR PUBLIC INSPECTION

Via ECFS

February 20, 2015

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

Re: *In the Matter of Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25; RM-10593 – Supplemental Responses to Data Collection of CenturyLink (FCC Registration No. 0018-6268-53)

Dear Ms. Dortch:

On January 29, 2015, CenturyLink filed with the Secretary in the above-referenced proceedings a redacted version of its responses to the essay questions in the Commission's special access data collection,¹ except for Question II.A.5.² CenturyLink made this filing pursuant to the instructions

¹ *In the Matter of Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25; RM-10593, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 16318 (2012); Notice of Office of Management and Budget Action, OMB Control No. 3060-1197 (Aug. 15, 2014); Order on Reconsideration, DA 14-1327 (rel. Sept. 15, 2014), Order, DA 14-1706 (rel. Nov. 26, 2014) (establishing a January 29, 2015 deadline for submissions by large companies).

² CenturyLink noted on January 29, 2015 that its responses to the remaining questions in the data collection would be filed in a subsequent submission. Toward that end, CenturyLink also filed on January 29, 2015 a Petition for Limited Waiver of Deadline for Data Submission, seeking an extension of time to make today's filing. Additionally, on February 13, 2015, CenturyLink filed a supplement to its earlier request for an extension, seeking to file the remainder of its

in the *Data Collection Protective Order*.³ CenturyLink also filed “Confidential” and “Highly Confidential” versions of its responses to these essay questions on January, 29, 2015 via the Special Access Web Portal established for this purpose.⁴

With this submission, CenturyLink is providing the following information:

- A revised version of Exhibit II.D.2-1, ILEC Intrastate Access Service Tariff References. Today’s filing supplements that submitted on January 29, 2015 by now including tariff information for New Mexico. The February 20, 2015 version of Exhibit II.D.2-1 replaces the previous one, and it contains no highly confidential information. It accompanies both the non-redacted (on a compact disc) and redacted versions of this submission.
- An essay response and data responsive to Question II.A.5. The essay response includes no highly confidential information, and it accompanies both the non-redacted (on a CD) and redacted versions of this submission. The data responsive to Question II.A.5, which is “Highly Confidential Data,” as specified in the *Data Collection Protective Order*,⁵ is being transmitted via the enclosed portable drive (serial number TRLVWLRL97AX).⁶ This Highly Confidential Data, which meets the definition of “Highly Confidential Information” as

submission by February 20, 2015. The FCC released an Order on February 18, 2015 granting CenturyLink an extension. Order, DA 15-202 (rel. Feb. 18, 2015).

³ See *In the Matter of Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25; RM-10593, Order and Data Collection Protective Order, DA-1424 ¶ 22 (Wireline Comp. Bur. rel. Oct. 1, 2014) (*Data Collection Protective Order*).

⁴ *In the Matter of Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25; RM-10593, Order on Reconsideration, 29 FCC Rcd 10899, Appendix A, Questions II.A.8; II.A.10, II.A.11, Part 2; II.A.18-19; II.D.1-2; II.F.8-12 (Wireline Comp. Bur. 2014).

⁵ *Data Collection Protective Order*, Appendix B, at 1.

⁶ A second portable drive (serial number TRVDUYQ9Y4YP) is also included, which includes the same material as on the other portable drive. Both drives are encrypted using Bitlocker for Windows 8.1 (which is FIPS 140-2 certified) (the content of this note applies to the additional references in this correspondence to both drives and associated serial numbers).

described in Appendix B, is omitted from the redacted version of this submission.

- Data, in a data container, responsive to the remaining Questions from Sections II.A, II.B and the Required Questions in II.F. This data is Highly Confidential Data that is also being transmitted via the enclosed portable drive (serial number TRLVWLRL97AX). This Highly Confidential Data is also omitted from the redacted version of this submission.
- A PDF file that provides explanatory material related to certain responses in the data container. This file contains Highly Confidential and Confidential information and is being transmitted via the enclosed portable drive (serial number TRLVWLRL97AX).

The highly confidential information that is Highly Confidential Data, which CenturyLink is submitting via the enclosed portable drives, 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 *Data Collection Protective Order*, CenturyLink has attached to this correspondence an Appendix providing separate justification for highly confidential treatment under FOIA⁷ and the Commission's implementing rules, 47 C.F.R. §§ 0.457, 0.459.

The highly confidential information being submitted includes location information for company fiber network routes and identifies locations of Nodes used for interconnection with third-party networks; data regarding rates and charges associated with channel terminations and transport facilities and other related information from which rates and charges could be inferred, along with customer billing data from CenturyLink's proprietary internal billing systems. All of this information is highly sensitive commercial information regarding CenturyLink's operations and service offerings. And, CenturyLink's customers may also consider the customer billing data to be proprietary and competitively sensitive.⁸ All of this information is of the type of highly confidential information specifically covered in Appendix B to the *Data Collection Protective Order*, and thus is entitled to highly confidential treatment and protection from public disclosure.

⁷ 5 U.S.C. § 552. See also *Data Collection Protective Order*, Appendix A, ¶ 1 and Appendix B.

⁸ On January 16, 2015, the Wireline Competition Bureau issued a subpoena to address concerns about the applicability of federal privacy statutes when responding to the data collection with consumer information. See *Wireline Competition Bureau Issues Subpoena for Providers in Special Access Data Collection*, Public Notice, WC Docket No. 05-25, RM-10593, DA 15-66 (rel. Jan. 16, 2015).

Consistent with the highly confidential nature of the information provided on the enclosed drives, the non-redacted version of the submission is marked, as required by the *Data Collection Protective Order*, “**HIGHLY CONFIDENTIAL & CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING RESTRICTED**”. This highly confidential information is competitively sensitive commercial information and thus should not be available for public inspection, nor subject to further copying. Such information would not ordinarily be made available to the public. Release of the highly confidential information would have a substantial negative competitive impact on CenturyLink. Accordingly, the submitted highly confidential information is appropriate for non-disclosure pursuant to the *Data Collection Protective Order* and under sections 0.457(d) and 0.459 of the Commission’s rules (as detailed in the attached Appendix).

CenturyLink is providing three hard copies of this cover letter and appended confidentiality justification and three CDs (each including the same material) (two copies for the FCC staff and one copy for the Secretary) and two portable drives (each including the same material for the FCC staff), which comprise the non-redacted submission (along with the portions of its submission containing no highly confidential information). The portable drives are each Dane 4 GB drives. A fourth copy of the cover letter and appended confidentiality justification is provided to be stamped and returned to the person making this submission.

A redacted version of this filing, in which the highly confidential information is omitted, along with the portions of the submission containing no highly confidential information, is being filed via the Commission’s Electronic Comment Filing System (ECFS). The redacted version of CenturyLink’s submission is marked, “**REDACTED – FOR PUBLIC INSPECTION**”.

The text of this letter and the appended confidentiality justification, which contain no highly confidential information, are 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.

Please contact me via the above contact information or Jeff Lanning in CenturyLink’s Federal Regulatory Affairs office (202-429-3113 or Jeffrey.s.lanning@centurylink.com) if you have any questions.

Sincerely,

/s/ Craig J. Brown

Enclosures

REDACTED – FOR PUBLIC INSPECTION

APPENDIX

Confidentiality Justification

47 C.F.R. § 0.457

Information included with CenturyLink's February 20, 2015 supplemental responses to the Commission's special access data collection, which is being filed via the enclosed portable drives, is also entitled to highly confidential treatment under 47 C.F.R. § 0.457, as well as the October 1, 2014 Order and Data Collection Protective Order (*Data Collection Protective Order*) in WC Docket No. 05-25 and RM-10593. The following types of highly confidential information are included: location information for company fiber network routes and identification of locations of Nodes used for interconnection with third-party networks; data regarding rates and charges associated with channel terminations and transport facilities and other related information from which rates and charges could be inferred, along with customer billing data from CenturyLink's proprietary internal billing systems. This information is highly sensitive commercial information regarding CenturyLink's operations and service offerings. And, CenturyLink's customers may also consider the customer billing data to be proprietary and competitively sensitive. All of this information is not routinely available for public inspection from the Commission and thus is protected from public availability under 47 C.F.R. § 0.457(d). Additionally, this information is the type of highly confidential information specifically covered in Appendix B to the *Data Collection Protective Order*, and which is thus entitled to highly confidential treatment and non-disclosure to the public.

47 C.F.R. § 0.459

CenturyLink also considers the highly confidential information submitted with its supplemental responses to the Commission's special access data collection in WC Docket No. 05-25 and RM-10593 as protected from public disclosure pursuant to 47 C.F.R. § 0.459(b) as described as follows.

Information for which confidential treatment is sought

CenturyLink seeks highly confidential treatment for the information included with its February 20, 2015 supplemental responses, which is highly confidential and proprietary commercial information that is protected from public disclosure and availability.

Commission proceeding in which the information was submitted

The supplemental responses to the Commission's special access data collection is being submitted in WC Docket No. 05-25 and RM-10593, *In the Matter of Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The supplemental responses include data CenturyLink considers proprietary and highly confidential as it includes information related to the location of company fiber network routes and identifies locations of Nodes used for interconnection with third-party networks; data regarding rates and charges associated with channel terminations and transport facilities and other related information from which rates and charges could be inferred, along with customer billing data from CenturyLink's proprietary internal billing systems. This information is highly sensitive commercial information regarding CenturyLink's operations and service offerings. And, CenturyLink's customers may also consider the customer billing data to be proprietary and competitively sensitive. All of this highly confidential and proprietary commercial information is not routinely available for public disclosure from CenturyLink and thus is protected from public availability under 47 C.F.R. § 0.457(d).

Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm

The types of highly confidential information in CenturyLink's supplemental responses would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that its release likely would produce competitive harm. The telecommunications services CenturyLink provides -- local exchange and interexchange services, etc. -- are all competitive. The release of this highly confidential proprietary information would cause competitive harm by allowing competitors to become aware of sensitive commercial information regarding CenturyLink's business and internal operations, and the competitive markets in which CenturyLink operates. And, the release of billing data that CenturyLink's customers may consider proprietary and competitively sensitive could also cause the company competitive harm.

Measures taken to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties

CenturyLink has treated and treats the sensitive commercial information disclosed in its supplemental responses as highly confidential, and has protected it from public disclosure.

Justification of the period during which CenturyLink asserts that the material should not be available for public disclosure

At this time, CenturyLink cannot determine any date on which the sensitive commercial information included with its supplemental responses should not be considered highly confidential.

Other information that CenturyLink believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable FCC and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.

Exhibit II.D.2-1 ILEC Intrastate Access Service Tariff References (supplemented on 02/20/15)

	Alabama	Alabama	Alabama	Arkansas	Florida	Georgia	Illinois	Indiana	Indiana	Indiana	Kansas	Louisiana	Michigan	Mississippi	Missouri
	N. AL	S. AL	Gulf	Arkansas	Florida	Coastal	Gallatin	CT of Central Ind	Odon	United	United KS	Evangeline	Michigan	CT MS	Ctel
DS1/DS3															
Initiation of Service	5.1	3.1	3.2	5	E.5	5	5	**	**	5	5	5.2	5.2	5.2	3
Service Upgrades	5.3	3.2	3.4	5	E.7.4	5	7.2	**	**	7.4.1	5	7.2	7.2	7.2	5.6
Service Disconnections	5.3	3.2.2	3.5	5	E.7.4	5	2.1.8	**	**	5.2.4	5	7.2	7.2	7.2	5.6
Ethernet															
Initiation of Service	17.A	17.A	NA	12.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.15
Service Upgrades	17.A.7	17.A.7	NA	12.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.15
Service Disconnections	17.A.7	17.A.7	NA	12.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.15
EVPL															
Initiation of Service	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Service Upgrades	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Service Disconnections	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metro Optical Ethernet MDE															
Initiation of Service	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Service Upgrades	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Service Disconnections	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ATM															
Initiation of Service	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Service Upgrades	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Service Disconnections	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Frame Relay															
Initiation of Service	NA	NA	NA	NA	E.18	NA	NA	NA	NA	NA	NA	NA	5.2.6 & 22.1	NA	NA
Service Upgrades	NA	NA	NA	NA	E.18	NA	NA	NA	NA	NA	NA	NA	5.2.6 & 22.1	NA	NA
Service Disconnections	NA	NA	NA	NA	E.18	NA	NA	NA	NA	NA	NA	NA	5.2.6 & 22.1	NA	NA

*** Concur with the Communications Corporation of Indiana Tariff I.U.R.C. No. 5

Missouri	Missouri	Nevada	Nevada	New Jersey	NC	NC	NC	Ohio	Ohio	PA	SC	TN	TN	Texas	Texas	Texas	Virginia
	Spectra	Central	Gem State	New Jersey	CT&T	Central	MebTel	C Tel	United	Pennsyl- vania	South Car	Adamsville	United	Central	San Marcos	United	Central
5	5	9	5	5	5	8	5	Concurs withFCC		5	5	5	5	9	5	5	9
7.4	5.6	5.4	7.4	7.4	7.4	5.4	7.4	Concurs withFCC		7.4	7.4	7.2	7.5	9	7.2	7.4	5.4
7.4	5.6	5.4	7.4	7.4	7.4	5.4	7.4	Concurs withFCC		7.4	7.4	7.2	7.5	9	7.2	7.4	5.4
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	16.3	7.3	NA	NA	18.2	18.2	NA	NA	NA	NA	18.2	NA	20.2	NA	NA	NA	NA
NA	16.3	7.3	NA	NA	18.2	18.2	NA	NA	NA	NA	18.2	NA	20.2	NA	NA	NA	NA
NA	16.3	7.3	NA	NA	18.2	18.2	NA	NA	NA	NA	18.2	NA	20.2	NA	NA	NA	NA

Virginia	Wisconsin	QC	QC	QC	CTEL	EL PASO	QC	QC	QC	CTEL-GEM	CTEL-ID	QC	QC	CTEL-POST	QC	QC	CTEL	Embarq
		AZ - PLTS Tariff No. 6	AZ - ACS Tariff No. 5	CO - ACS Catalog	CO - PLTS Catalog No. 1	EP - PLTS Catalog No. 2	NID - ACS Catalog No. 2	SID - ACS Catalog No.	ID Access Catalog No. 3	ID Access Catalog No. 4	IA - ACS Catalog	IA-PLTS Catalog	MIN-ACS Price List No. 1	MIN-PLTS Price List No.	CTEL MN Access Tariff No.1			
5	5	5.2.13/5.2.14		dereg	7.9	7.1.4	dereg	dereg	7.8.1	7.8.1		5.2.13/ 5.2.14		6.7.1	5.2.13/ 5.2.14	7.10.1		7.2.4
7.4	7.2	5.2.13/5.2.14		dereg	7.2	7.2.4	dereg	dereg	7.2.4	7.2.4		5.2.13/ 5.2.14		6.2.4	5.2.13/ 5.2.14	7.2.4		7.2.4
7.4	7.2	5.2.13/5.2.14		dereg	7.2	5.7	dereg	dereg	5.5.1	5.5.1		5.2.13/ 5.2.14		4.2.1	5.2.13/ 5.2.14	5.5.1		5.2.7
NA	12.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	12.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	12.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NA	NA	NA	10.1	10.1	NA	NA	NA	10.1	NA	NA	10.1	NA	10.1	NA	NA	NA	NA	NA
NA	NA	NA	10.4	10.4	NA	NA	NA	10.4	NA	NA	10.4	NA	10.4	NA	NA	NA	NA	NA
NA	NA	NA	3.4	3.4	NA	NA	NA	3.4	NA	NA	3.4	NA	3.4	NA	NA	NA	NA	NA
NA	NA	NA	7.1	107.1	NA	NA	NA	107.1	NA	NA	NA	NA	7.1	13.2.1	NA	NA	NA	NA
NA	NA	NA	7.3	107.3	NA	NA	NA	107.3	NA	NA	NA	NA	7.3	13.2.2	NA	NA	NA	NA
NA	NA	NA	3.4	3.4	NA	NA	NA	3.4	NA	NA	NA	NA	3.4	4.2.1	NA	NA	NA	NA
NA	NA		5.1	5.1	NA	NA	5.1	5.1	NA	NA	5.1	NA	5.1	13.1.1	NA	NA	NA	NA
NA	NA		5.3	5.3	NA	NA	5.3	5.3	NA	NA	5.3	NA	5.3	13.1.2	NA	NA	NA	NA
NA	NA		3.4	3.4	NA	NA	3.4	3.4	NA	NA	3.4	NA	3.4	4.2.1	NA	NA	NA	NA

QC	QC	CTEL	United	QC	QC	CTEL	United	QC	CTEL	United
WA-ACS Catalog No. 2	WA-PLTS Catalog No. 2	WA-PLTS Catalog No. 1	WA-PLTS Catalog No. 2	WA-ACS Catalog No. 2	WY-PLTS Catalog No.	WY-PLTS Access Tariff No. 2	WY-ACS Catalog No. 2	WY-PLTS Access Tariff No. 2	WY-ACS Access Tariff No. 2	WY-ACS Access Tariff

	5.2.11/ 5.2.12	7.1	7.1		5.2.11	7.1		7.1	7.1	7.1
	5.2.11/ 5.2.12	7.4	7.4		5.2.11	7.4		7.4	7.4	7.4
	3.1	5.2.6	5.2.6		3.1	5.2.6		3.1	5.2.6	5.2.7

NA										
NA										
NA										

NA										
NA										
NA										

11.1	NA	NA	NA	10.1	NA	NA	NA	NA	NA	NA
11.4	NA	NA	NA	10.4	NA	NA	NA	NA	NA	NA
3.4	NA	NA	NA	3.4	NA	NA	NA	NA	NA	NA

107.1	NA									
107.3	NA									
3.4	NA									

5.1.1	NA	NA	NA	5.1.1	NA	NA	NA	NA	NA	NA
5.3	NA	NA	NA	5.3	NA	NA	NA	NA	NA	NA
3.4	NA	NA	NA	3.4	NA	NA	NA	NA	NA	NA

**SPECIAL ACCESS DATA COLLECTION
CENTURYLINK ESSAY RESPONSES**

***II.A.5. Fiber Network Map.** Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.*

Response:

CenturyLink submits Shapefiles showing the fiber routes it owns or leases pursuant to an IRU agreement. CenturyLink obtained data on its fiber routes from network fiber records.

CenturyLink also reports its Nodes in the mapping data and submits the requested Node data in Table II.A.5.Nodes. CenturyLink excluded from Table II.A.5.Nodes any node with the same address as a Location. CenturyLink used the Central Location Online Entry System (CLONES) database to obtain the “Node Year” for each Node, which reflects the earliest date when there was an indication of node associated with a CenturyLink entity being added or created. In the 133 instances in which the CLONES database could not provide the “Node Year,” CenturyLink reported “1000” as a proxy for Null.