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December 4, 2015

REDACTED – FOR PUBLIC INSPECTION

Via ECFS

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

Re: *In the Matter of Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent To Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 15-149; CenturyLink's Response to Request for Information and Data from CenturyLink, Inc. of October 9, 2015*

Dear Ms. Dortch:

Enclosed for filing in the above-referenced proceeding is material responsive to the Media Bureau's October 9, 2015 Request for Information and Data from CenturyLink, Inc. (Request).¹

On November 20, 2015, CenturyLink filed material in the above-referenced proceeding in response to the Request that included Attachment 7A as a partial response to Request 7. CenturyLink submits today an updated Attachment 7A which includes data relating to settlement-free peering traffic. In the cover letter to the November 20, 2015 submission, CenturyLink indicated that it had not yet identified certain customers in Attachment 7A with whom it has peering arrangements because we had not yet provided notice to those customers of the Request. CenturyLink has now sent notice to these customers of the Request and has not received any objection to providing the requested information confidentially in this proceeding. CenturyLink is thus re-filing the tables today with additional customer information.

¹ Letter from William T. Lake, FCC, to Melissa Newman, CenturyLink, (October 9, 2015).

The updated Attachment 7A again contains highly confidential information that is protected from disclosure pursuant to the terms of the Protective Order adopted in this proceeding.² CenturyLink asks that its request for confidential treatment as contained in the November 20, 2015 correspondence, along with the accompanying rationale for confidential treatment, which is incorporated by reference herein, apply to today's submission.

Updated Attachment 7A submitted today includes detailed information regarding peering arrangements. This information is of the type of highly confidential information specifically covered in Appendix A to the Protective Order and accordingly entitled to highly confidential treatment and protection from public disclosure.

This information is also competitively sensitive information relating to CenturyLink services and is not otherwise available from public sources. Release of this highly confidential information would have a substantial negative competitive impact on CenturyLink and potentially on the other entities with whom CenturyLink has these peering arrangements. Accordingly, this information is also appropriate for non-disclosure under sections 0.457(d) and 0.459 of the Commission's rules (as detailed in the Appendix to our November 20, 2015 submission).

Consistent with the highly confidential nature of the information provided, as required by the Protective Order, this information is marked "**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN MB DOCKET NO. 15-149 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING RESTRICTED**". The highly confidential information included in updated Attachment 7A is competitively sensitive financial and 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 provided would have a substantial negative competitive impact on CenturyLink and potentially on the companies with whom CenturyLink has peering arrangements, transit service arrangements, and service contracts.

Pursuant to the Instructions in the Request and the 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 an encrypted CD containing updated Attachment 7A).³ Additionally, as required by the Protective Order, CenturyLink is

² *In the Matter of Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent To Assign or Transfer Control of Licenses and Authorizations*, Order, MB Docket No. 15-149, FCC 15-110 (rel. Sept. 11, 2015), Attachment (Protective Order).

³ Also included with the non-redacted version of the submission are those portions containing no confidential information.

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separately providing two copies of the non-redacted version with the highly confidential information to Vanessa Lemmé of the Media Bureau (two hard copies of this cover letter and an encrypted CD containing updated Attachment 7A).⁴

CenturyLink is also submitting today under separate cover, via the Commission's Electronic Comment Filing System (ECFS), a redacted version of this submission that contains no highly confidential information. The redacted submission is marked "**REDACTED – FOR PUBLIC INSPECTION**," with the highly confidential information omitted. This letter includes no highly confidential or confidential information. As requested, CenturyLink is also providing one copy of the redacted version to the Secretary's office and to Vanessa Lemmé of the Media Bureau.

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/ Tiffany West Smink

Enclosures

cc: Vanessa Lemmé (two copies of non-redacted submission via hand delivery; and one copy of redacted submission via hand delivery)

⁴ Also included with the non-redacted version of the submission are those portions containing no confidential information.

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