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Associate General Counsel

REDACTED – FOR PUBLIC INSPECTION

Non-Redacted Via Courier – Redacted Via ECFS

January 19, 2016

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

Re: *In the Matter of Rates for Interstate Inmate Calling Services* – WC Docket No.
12-375

Dear Ms. Dortch:

Pursuant to the FCC’s December 19, 2013 Protective Order issued in WC Docket No. 12-375,¹ CenturyLink submits the attached Comments.

CenturyLink regards certain costing information contained in its Comments as confidential information to be filed pursuant to the Protective Order. Each page of the non-redacted version of the submission has been marked “**CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**”. CenturyLink requests that the non-redacted version of its submission be withheld from public inspection.

This information is also protected from disclosure to the public by Sections 0.457(d) and 0.459 of the Commission’s rules.² The confidential information included in these Comments is competitively sensitive costing information and thus should not be available for public inspection. Such information would not ordinarily be made available to the public. Release of the confidential information in the Comments would have a substantial negative competitive

¹ *In the Matter of Rates for Interstate Inmate Calling Services*, Protective Order, WC Docket No. 12-375, DA 13-2434, rel. Dec. 19, 2013.

² 47 C.F.R. §§ 0.457(d), 0.459.

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impact on CenturyLink. Accordingly, the non-redacted information in question is appropriate for non-disclosure under sections 0.457(d) and 0.459. Pursuant to 47 C.F.R. § 0.459(b), CenturyLink provides justification for the confidential treatment of this information in the Appendix to this letter.

For the non-redacted version of its submission, CenturyLink is providing to the Office of the Secretary an original hard copy of the cover letter and Comments, along with an extra copy to be stamped and returned to the courier. Additionally, as required by the Protective Order, CenturyLink is transmitting two hard copies of the non-redacted version of its submission to Lynne Engledow of the Wireline Competition Bureau. CenturyLink is also filing today under separate cover, via the Commission's Electronic Comment Filing System (ECFS), a redacted version of its Comments and cover letter. Each page of the redacted version of the Comments (mirroring the corresponding pages of the non-redacted version with confidential information) is marked "**REDACTED – FOR PUBLIC INSPECTION,**" with the confidential information on pages 6 and 7 omitted.

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me via the above contact information if you have any questions.

Sincerely,

/s/ Thomas Dethlefs

Enclosures

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APPENDIX

Confidentiality Justification

CenturyLink requests confidential treatment of certain information in the attached Comments of CenturyLink. The information includes costing information which is competitively sensitive and its public disclosure would have a negative competitive impact on CenturyLink. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under both 47 C.F.R. §§ 0.457 and 0.459. In addition, the confidential information is protected from disclosure under the December 19, 2013 Protective Order³ in the above-referenced docket.

47 C.F.R. § 0.457

Specific costing information in the Comments is confidential and proprietary to CenturyLink as “commercial or financial information” under section 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information and have a harmful competitive effect on CenturyLink’s ongoing business enterprise and its operations. Therefore, in the normal course of Commission practice this information should be considered “Records not routinely available for public inspection.”

47 C.F.R. § 0.459

The specific costing information is also subject to protection under 47 C.F.R. § 0.459(b), as demonstrated below.

Information for which confidential treatment is sought

CenturyLink requests that the specific costing information be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. This information is competitively sensitive data that CenturyLink maintains as confidential and does not normally make available to the public. Release of the information would have a substantial negative competitive impact on CenturyLink. Each page of the non-redacted version of the Comments has been marked **“CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12-375 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION”**.

³ *In the Matter of Rates for Interstate Inmate Calling Services*, Protective Order, WC Docket No. 12-375, DA 13-2434, rel. Dec. 19, 2013.

Commission proceeding in which the information was submitted

The information is being submitted in connection with CenturyLink's Comments as filed in WC Docket No. 12-375.

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

The information designated in the Comments as confidential is costing information. As noted above, this data is competitively sensitive information that is not normally released to the public, as such release would have a substantial negative competitive impact on CenturyLink.

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

This type of commercial information 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 the release of this kind of information likely would produce competitive harm. CenturyLink confirms that release of the information designated as confidential in its submission would cause it substantial competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of CenturyLink's business.

Measures taken by CenturyLink 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 non-public information included in its submission (in non-redacted form) as confidential and has protected it from public disclosure to parties outside the Company. CenturyLink has not made the costing information available to the public.

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

CenturyLink cannot determine at this time any date on which this information should not be considered confidential or would become stale for purposes of the current matters, except that the information would be handled in conformity with general CenturyLink records retention policies, absent any continuing legal hold on the data.

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

Under applicable Commission 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.

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