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Via ECFS

June 15, 2016

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

Re: *Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143; *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, WC Docket No. 15-247; *Special Access for Price Cap Local Exchange Carriers*; *AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593

Dear Ms. Dortch:

On June 13, 2016, Bill Cheek, John Jones, Jeff Lanning, and the undersigned of CenturyLink, Inc., along with Russell Hanser of Wilkinson Barker Knauer, LLP, participated in a meeting with Jonathan Sallet of the Office of General Counsel and Matthew Del Nero and Deena Shetler of the Wireline Competition Bureau regarding the above-referenced proceedings.

During the meeting, CenturyLink discussed its initial thinking on other matters set out in the Commission's May 2 Further Notice of Proposed Rulemaking ("FNPRM"). For example:

- CenturyLink explained that the application of "catch-up" and "going-forward" annual productivity factors would be inappropriate, especially in light of declining incumbent LEC network utilization.
- CenturyLink observed that cell-site backhaul should constitute a separate market not subject to price regulation, given the sophistication and resources available to mobile service providers.
- Evaluations of competition in other markets must account for services provisioned using unbundled network elements and cable services (especially cable-provisioned Ethernet).

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- Geographic markets should be set at a level of granularity that promotes administrability – a standard that would preclude a building-by-building or site-by-site approach.
- In non-competitive markets, the Commission should rely on posted prices rather than on mandatory tariffing.

CenturyLink indicated that it would continue to evaluate the issues presented in the FNPRM and looks forward to working with the Commission as it considers its new regime.

Finally, CenturyLink explained that recent revelations regarding cable providers' responses to the Commission's data request show that many cable companies were, in 2013, capable of providing Metro Ethernet service (not what the Commission calls "best efforts" service) far more broadly than originally thought. This shift has dramatic implications for these proceedings, and the agency must account for the new information in conducting any competitive market analysis.

Please contact the undersigned with any questions.

Sincerely,

/s/ Melissa E. Newman

Copy to:

Jonathan Sallet
Matthew Del Nero
Deena Shetler