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March 9, 2011

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Meeting

**Qwest Communications International, Inc. and CenturyTel, Inc. d/b/a
CenturyLink, Application for Transfer of Control Under Section 214 of the
Communications Act, as Amended, WC Docket No. 10-110**

**A National Broadband Plan for Our Future, GN Docket No. 09-51
Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559
MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz 2483.5-2500 MHz, and 2000-
2020 MHz and 2180-2200 MHz, ET Docket No. 10-142**

Dear Ms. Dortch:

On March 8, 2011, Neil L. Brodsky, Senior Corporate Counsel, Granite Telecommunications, LLC and the undersigned, met with Commissioner Mignon Clyburn and her legal advisor, Louis Peraertz. Granite updated the attendees on its progress in serving the national multi location business market and addressed the following policy matters.

First, Granite expressed concern regarding the pending Qwest/CenturyLink transaction and the post-merger wholesale local services market in the regions that the combined company will serve. Granite currently has an agreement for Qwest's wholesale local services and obtains such services at discounted rates. In contrast, CenturyLink has to date refused to provide similar wholesale services to Granite in the CenturyTel footprint. In its petition to deny the merger application, Granite specifically requested that the Commission require Qwest/CenturyLink, as a direct and specific condition to its pending merger, to offer wholesale local services not only in the Qwest region but also in the legacy CenturyLink territories as a condition of the merger.

Second, Granite observed that Qwest continues to discriminate in the provision of wholesale services to Granite and other similarly situated CLECs by refusing to make available wholesale voice service at locations where Qwest has replaced its copper loops with fiber fed loops. Granite reiterated its belief that the merger would only be in the public interest if it were conditioned on, among others, a requirement that Qwest to offer

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its wholesale voice service at any location where a customer could purchase retail voice services from Qwest, regardless of the underlying technology Qwest chose to provide the loop.

Third, Granite expressed concern that as its existing agreements with the Applicants expire, the Applicants will raise the prices pursuant to which Granite has been purchasing service and/or reduce retail prices below the price for their wholesale offerings. These concerns are exacerbated because there is no viable wholesale commercial alternative to the Applicants' last mile facilities and the potential for entry of another source of last mile access is unlikely for the foreseeable future. For these reasons, the Commission should require, as a condition of approval of the proposed merger, that the Applicants offer CLECs the option of continuing current commercial agreements in effect for the full duration of the merger conditions, and ensure that Qwest's OSS and billing systems remain in place for the duration of any such condition.

Finally, Granite discussed its current ability to obtain DSL services for resale on a competitive basis from a number of ILECs with the notable exception of AT&T. While other ILECs allow competitors to provide their customers with DSL service over the same line they purchase for voice service, AT&T requires Granite and other requesting carriers to purchase a separate line, thereby artificially raising Granite's costs.

Sincerely,

/s/ electronically signed

Joshua M. Bobeck

cc (by e-mail):

Commissioner Mignon Clyburn
Louis Peraertz