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Via Electronic Filing

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

Re: SAVVIS, Inc., Transferor and CenturyLink, Inc., Transferee, Application for Consent to Transfer of Control of SAVVIS, Inc. and SAVVIS Communications Corporation Pursuant to Section 214 of the Communications Act of 1934, as Amended -- WC Docket 11-97

Dear Ms. Dortch:

The above-captioned joint domestic and international Section 214 application was filed on May 19, 2011. The application stated that the proposed transaction presumptively qualifies for streamlined processing procedures pursuant to Section 63.03(b)(2)(ii) of the Commission's rules because neither of the Applicants is dominant in the domestic interexchange telecommunications market, the only regulated services sector in which both operate, and the combined market share of the Applicants is less than ten percent of the interstate interexchange market.

The application noted that CenturyLink (through its subsidiaries) is regulated by the Commission as a dominant local exchange carrier (LEC) in those locations where it is the incumbent LEC (ILEC),¹ but also explained that the Applicants do not compete with one another for local exchange or exchange access services. CenturyLink has no intention by this acquisition to provide competitive telephone exchange service or exchange access service. SAVVIS provides private line data transmission services only on an interexchange basis, and entirely over leased facilities. SAVVIS has never provided competitive local exchange or exchange access services in any geographic area where CenturyLink affiliates are dominant. Therefore, the Applicants believed that streamlined treatment should apply.

¹ Footnote 12 to the application lists all 37 states in which CenturyLink's subsidiaries provide telecommunications services.

Pursuant to informal discussion with the Wireline Competition Bureau staff during the last two business days, the Applicants hereby supplement the application with additional information. Specifically, the Applicants hereby identify the twelve states in which CenturyLink (through its ILEC subsidiaries) provides local exchange and exchange access service as a dominant carrier, and SAVVIS Communications Corporation provides domestic interexchange private line data transmission service as a non-dominant carrier. The states are: Arizona, California, Colorado, Florida, Georgia, Illinois, Missouri, New Jersey, Pennsylvania, Texas, Virginia and Washington. As stated in the application, the Applicants believe that SAVVIS's share of U.S. telecommunications services is *de minimis*, and the combined share of the Applicants will be less than ten percent.²

The Applicants withdraw their request for presumptive streamlined processing, but urge the Commission to process the application expeditiously. Please direct any questions concerning this matter to me.

Very truly yours,

/s/ Karen Brinkmann
Karen Brinkmann
Counsel for CenturyLink, Inc.

cc: Dennis Johnson, FCC Wireline Competition Bureau
Scott Feira, *Counsel for SAVVIS, Inc.*

² Application of SAVVIS, Inc., Transferor and CenturyLink, Inc., Transferee, WC Docket No. 11-97, n. 8 (SAVVIS Holdings owns no U.S. telecommunications facilities, either directly or indirectly, but provides transmission through leased dark fiber and leased lit fiber capacity; SAVVIS's share of the U.S. interexchange private line telecommunications market is less than one-tenth of one percent); *id.* n. 18 and accompanying text (SAVVIS derived less than one percent of its total revenues last year from U.S. interexchange private line telecommunications services, and the combined companies' revenue share of total U.S. interexchange telecommunications services will be less than ten percent).