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Kathryn Marie Krause
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REDACTED – FOR PUBLIC INSPECTION

Via Courier and ECFS

October 14, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: ET Docket No. 04-295 – REVISED System Security and Integrity
Manual for CenturyLink, Inc.

Dear Ms. Dortch:

Attached is a CenturyLink, Inc. (CTL)¹ REVISED System Security and Integrity Manual being filed in line with the requirements of Section 1.20005(a) of the Federal Communications Commission's (Commission or FCC) rules.² CTL requests confidential treatment of its Manual pursuant to Section 0.459 of the Commission's rules³ and includes a Confidentiality Justification with this submission. By filing this Confidentiality Justification pursuant to Section 0.459, CTL is not conceding that its Manual does not fall within a specific Freedom of Information Act exemption pursuant to 5 U.S.C. § 552(b). The non-redacted version of CTL's submission is marked **CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**.

CTL is also filing today under separate cover via the Electronic Comment Filing System a redacted version of this submission that includes the cover letter and the attached Confidentiality Justification, neither of which contain any confidential information. The revised

¹ On April 1, 2011, CTL and Qwest Communications International Inc. (QCII) consummated a transaction whereby QCII became a wholly owned subsidiary of CTL.

² 47 C.F.R. § 1.20005(a).

³ 47 C.F.R. § 0.459.

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Manual, which is confidential and proprietary CTL information, has been omitted from the redacted version of the submission. The redacted version of the submission is marked **REDACTED – FOR PUBLIC INSPECTION**.

A copy of CTL's submission, in both non-redacted and redacted formats is also being served today on David Ward, Senior Attorney, Policy Division, Public Safety and Homeland Security Bureau.

An original and one copy of the non-redacted submission are included for filing. A second copy of the non-redacted submission is also provided, to be stamped as received and returned to the courier.

Please contact me at the above-listed contact information if you have any questions.

Sincerely,

/s/ Kathryn Marie Krause

cc (via courier): David Ward -- Public Safety and Homeland Security Bureau

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ATTACHMENT

Confidentiality Justification

47 C.F.R. § 0.459

Information for which confidential treatment is sought

CTL requests confidential treatment of its attached System Security and Integrity Manual under 47 C.F.R. § 0.459. CTL's attached Manual contains confidential and proprietary information. The information in CTL's Manual for which it requests confidential treatment bears the legend **CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**.

Commission proceeding in which the information was submitted

The Revised Manual is being submitted in ET Docket No. 04-295 pursuant to 47 C.F.R. § 1.20005(a).

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

CTL's Manual contains business policies and procedures for systems security and integrity which are proprietary and not for public distribution. The FCC has already found that information contained in a carrier's Manual that outlines the carrier's policies and procedures for dealing with systems security and integrity is of a "sensitive nature." *See In the Matter of Communications Assistance for Law Enforcement Act*, Report and Order, 14 FCC Red 4151, 4177 ¶ 57 (1999).

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

CTL's services are subject to competition. The specifics of how CTL handles security requests and how it responds to law enforcement could provide competitors with information that they might seek to replicate without compensation to CTL or in competition with it.

Measures taken by CTL to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties

CTL treats the information disclosed in its Manual as confidential and protects it from public disclosure.

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

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At this time, CTL cannot determine any date on which the information in its submitted Manual should not be considered confidential.

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

Exemption 7 of the Freedom of Information Act, 5 U.S.C. § 552(b) (7) shields information that would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law. CTL's Manual satisfies this test.

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