



December 5, 2011

FILED/ACCEPTED

BY HAND DELIVERY

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

DEC -5 2011

Federal Communications Commission
Office of the Secretary

Re: **REDACTED — FOR PUBLIC INSPECTION**

Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25

Dear Ms. Dortch:

As required by the Second Protective Order in this proceeding, attached is a redacted version of Level 3 Communications, LLC's cover letter on its provision of data to the Wireline Competition Bureau related to the above-referenced proceeding. All information on the DVD referenced in the attached cover letter is Highly Confidential Information subject to the Commission's Second Protective Order, as clarified by the Wireline Competition Bureau's May 2, 2011 letter, DA 11-805, in this proceeding. Thus, no copy of that DVD is attached.

Please let me know if you have any questions.

Respectfully submitted,

Erin Boone
Senior Corporate Counsel,
Federal Regulatory Affairs
LEVEL 3 COMMUNICATIONS LLC
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Andrew Mulitz
Pricing Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **REDACTED — FOR PUBLIC INSPECTION (HIGHLY CONFIDENTIAL
ENCLOSURE OMITTED)**

*Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No.
05-25*

Dear Ms. Dortch and Mr. Mulitz:

Level 3 Communications, LLC (“Level 3”) hereby encloses with this letter data responsive to the Federal Communication Commission’s September 19, 2011 Public Notice in the above-referenced proceeding requesting competition data. ***Please note that all information on the enclosed DVD is Highly Confidential Information subject to the Commission’s Second Protective Order, as clarified by the Wireline Competition Bureau’s May 2, 2011 letter, DA 11-805, in this proceeding.*** FCC staff has explained to us that the Wireline Competition Bureau intended its September 19 Public Notice to serve as “specific[] authoriz[ation]” to designate information in this response as Highly Confidential.¹ This data contains highly detailed or granular customer or geographic information regarding the following categories of highly confidential information covered by the Second Protective Order:

¹ See Second Protective Order para. 5, *Special Access for Price Cap Local Exchange Carriers*, No. 05-25 (rel. Dec. 27, 2010) (requiring specific authorization); Public Notice at 2 (noting that parties may submit data “in accordance with the *Modified First Protective Order*, the *Second Protective Order*, and supplements to the *Second Protective Order* issued in this proceeding”); *id.* at 21 (noting filing procedures for Highly Confidential Information).

- The locations that companies serve with last-mile facilities and the nature of those facilities (e.g., whether the last-mile facilities consist of conditioned copper loops, DS1 loops, DS3 loops, Ethernet loops, number of fiber strands, actual and potential capacity, whether the facilities are leased on an indefeasible right of use basis or are self deployed);
- The extent to which companies rely on incumbent local exchange carrier (“ILEC”) and non-incumbent LEC last-mile facilities and local transport facilities to provide special access-like services and the nature of those inputs (e.g., the names of suppliers and whether the inputs are conditioned copper loops, DS1 loops, DS3 loops, Ethernet loops);
- The location of companies’ fiber network routes;
- The types of customers companies serve and the types of special access-type services demanded by those customers;
- The rates or charges associated with channel terminations or transport facilities, and information from which, whether alone or in combination with other confidential or non-confidential information, such rates or charges could be inferred;
- The circuit identifiers, tariff or contract identifiers, or other information associating channel terminations or transport facilities with a particular tariff or contract;
- The CLLI codes for the end office nearest to channel terminations or transport facilities.

As required by the Protective Orders, we are hand delivering one unredacted copy of this filing to the Secretary’s Office and two copies to Andrew Mulitz. A copy of this letter (but without the Highly Confidential CD) is being filed publicly under separate cover.

Respectfully submitted,



Erin Boone
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