

February 27, 2012

FILED/ACCEPTED

BY HAND DELIVERY

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

FEB 27 2012
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 CD 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 CD 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
1120 Vermont Avenue, N.W. Suite T1000
Washington, DC 20005
(202) 521-8893



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

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”) encloses with this letter data supplementing its December 5, 2011 response to the Federal Communication Commission’s September 19, 2011 Public Notice in the above-referenced proceeding requesting competition data. The files on the enclosed disc are intended to replace a corrupted spreadsheet included on Level 3’s December 5, 2011 filing, as discussed via email with Andrew Mulitz. This filing replaces our response to Request III.D.1 item 29.

Please note that all information on the enclosed CD 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

¹ See Special Access for Price Cap Local Exchange Carriers, *Second Protective Order* para. 5, WC Docket No. 05-25 (rel. Dec. 27, 2010) (requiring specific authorization); *Public Notice* at 2 (rel. Sept. 19, 2011) (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*

This information is intended to supplement the previous submission of Level 3, made on December 5, 2011, and responds specifically to section III.D (*Circuits Purchased*) of the Public Notice. Due to a unique billing format employed by one of Level 3's vendors, these files were inadvertently excluded by Level 3 during its initial data collection.

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:

- 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.

issued in this proceeding"); *id.* at 21 (noting filing procedures for Highly Confidential Information).

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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