Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

In the Matter of Petition of CenturyLink for Forbearance Pursuant to 47 U.S.C. § 160(c) from Dominant Carrier and Certain *Computer Inquiry* Requirements on Enterprise Broadband Services	WC Docket No. 12-60

REPLY COMMENTS OF VERIZON

Michael E. Glover
VERIZON
1320 North Courthouse Road
9th Floor
Arlington, VA 22201-2909

Of Counsel

Edward Shakin
Curtis L. Groves
VERIZON
1320 North Courthouse Road
9th Floor
Arlington, VA 22201-2909
(703) 351-3084

Scott H. Angstreich
KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, D.C. 20036
(202) 326-7900

Counsel for Verizon

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REPLY COMMENTS OF VERIZON[1]

The enterprise broadband marketplace has long been robustly competitive, and it has become even more so since the Commission in 2007 granted AT&T's forbearance petition.[2] Many providers are thriving in this innovative and rapidly growing marketplace. As Corning explains, this increased competitiveness can be traced to the Commission's orders "granting to other carriers the identical regulatory relief requested by CenturyLink," which have "contributed to increased fiber deployment throughout the United States and promoted competition in enterprise broadband services nationwide."[3] Corning's views are entitled to particular weight: as a company that sells "goods and services that are inputs to the production and use of information services," such as the enterprise broadband services at issue here, Corning has "the incentive to make a completely unbiased judgment" on the need for continued regulation of those services.[4] The Commission should heed Corning's "judgment" and grant CenturyLink's petition.

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[1] The Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc. ("Verizon").

[2] *See Petitions of AT&T Inc. and BellSouth Corp. for Forbearance*, Memorandum Opinion and Order, 22 FCC Rcd 18705 (2007) ("*AT&T Forbearance Order*"), *petitions for review denied, Ad Hoc Telecomms. Users Comm. v. FCC*, 572 F.3d 903 (D.C. Cir. 2009).

[3] Corning Comments at 1-2.

[4] *United States v. Western Elec. Co.*, 993 F.2d 1572, 1582 (D.C. Cir. 1993) (emphasis omitted).

Although three commenters urge the Commission to deny CenturyLink's petition, they do not identify a single marketplace failure — or erroneous predictive judgment — with regard to enterprise broadband services in the four-and-a-half years since the Commission granted AT&T's forbearance petition. In fact, one of them, tw telecom, is ranked third in the United States in the provision of business Ethernet service,[5] which has recently overtaken legacy services in total bandwidth sold. Indeed, tw telecom just announced its first quarter 2012 results, which included "23.7% growth [year-over-year]" for tw telecom's Ethernet and VPN-based products, which now account for approximately one-quarter of tw telecom's revenue.[6] Another, Sprint, recently announced an award of contracts to dozens of companies, after a highly competitive bidding process, for building fiber-based backhaul capable of delivering Ethernet at 15,000 of its cell sites; Sprint expects to announce another set of contracts for fiber backhaul at 15,000 more sites in mid-2012.[7] And NASUCA acknowledges the extensive competition in the marketplace, noting that "even companies that have been granted the types of forbearance which CenturyLink seeks have experienced market losses."[8]

Given the Commission's lengthy and positive track record in this area, which Corning confirms, the Commission should reject calls to abandon that approach in favor of the approach the

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[5] *See* Vertical Systems Group, *2011 U.S. Business Ethernet LEADERBOARD: Ethernet Port Base Rises 31% in 2011 on Solid Market Demand and More Competitive Service Pricing* (Feb. 13, 2012) ("*Year-End 2011 Leaderboard*"), *available at* http://verticalsystems.com/prarticles/stat-flash-02-2012-Year-End%202011_Leaderboard_prnews.html.

[6] *See* tw telecom, *Supplemental Earnings Information: First Quarter 2012*, at 8 & 12, http://www.twtelecom.com/PDFs/Investors/Financial-Reporting/Q1_2012_Supplemental_Slides/.

[7] *See* Carol Wilson, *Sprint To Reveal Backhaul Contract Winners Friday*, Light Reading (Oct. 5, 2011), http://www.lightreading.com/document.asp?doc_id=213050.

[8] NASUCA Comments at 7.

Commission applied in the *Qwest Phoenix Order*.[9] In the *AT&T Forbearance Order*, the Commission extensively explained the reasons for adopting its approach to petitions seeking forbearance with respect to enterprise broadband services. Those reasons apply equally today.

DISCUSSION

I. THE PROVISION OF ENTERPRISE BROADBAND SERVICES IS ROBUSTLY COMPETITIVE

Since October 2007, when the Commission issued the *AT&T Forbearance Order*, the marketplace for enterprise broadband services has witnessed innovation and substantial competition resulting in new services. No true incumbents exist in this marketplace segment, because every provider is deploying new non-TDM-based services and facilities. Moreover, the Commission has long recognized that "competition in the enterprise market is robust"[10] and that "myriad providers are prepared to make competitive offers" to enterprise customers such that no provider exerts market power.[11] In addition, the customer base for these services is "highly sophisticated" and capable of "negotiat[ing] for significant discounts."[12] This is particularly true in two increasingly important areas: business Ethernet and mobile backhaul.

A. Business Ethernet Services

Most prominently, business Ethernet services have rapidly developed, and the marketplace for these services is fiercely competitive. These services are "being offered by numerous non-

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[9] *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Phoenix, Arizona Metropolitan Statistical Area*, Memorandum Opinion and Order, 25 FCC Rcd 8622 (2010) ("*Qwest Phoenix Order*"), *petition for review pending*, *Qwest Corp. v. FCC*, No. 10-9543 (10th Cir. filed July 30, 2010).

[10] *SBC Communications Inc. and AT&T Corp. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18290, ¶ 73 & n.223 (2005).

[11] *Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18433, ¶ 74 (2005).

[12] *Id.* ¶ 75; *see also id.* ¶ 76 (noting that this level of sophistication is "significant not only because it demonstrates that these users are aware of the multitude of choices available to them, but also because they show that these users are likely to make informed choices based on expert advice" to "seek out best-price alternatives").

incumbents, including MSOs, CLECs and formerly IP/MPLS virtual network operators (VNOs)."[13] The top five business Ethernet service providers include tw telecom (#3), Cox (#4), and XO (#5).[14] Cox and XO recently surpassed CenturyLink, which is now the sixth ranked provider, but was ranked fourth in mid-2011.[15] Rounding out the top nine are Time Warner Cable (#7), Level 3 (#8), and Cogent (#9).[16] At least 21 other companies are providing business Ethernet services: AboveNet, American Telesis, Bright House Networks, Charter Business, Comcast Business, Expedient, FiberLight, Frontier, Integra, Lightower, Masergy, Megapath, NTT America, Optimum Lightpath, Orange Business, Reliance GlobalCom, Sidera Networks, SuddenLink, Virtela, Windstream (including Paetec), and Zayo Group.[17]

As the rankings confirm, cable companies continue to make significant investments in their capacity to provide business Ethernet services and are competing successfully for the customers of those services. Last month, "executives from three major U.S. cable companies [Comcast, Time Warner Cable, and Bright House Networks] said they'll keep pouring more resources into business services initiatives in 2012, after strong growth over the past several years."[18] Cox, which "became the first cable operator to reach $1 billion in annual commercial service revenue, is shooting to hit $2 billion by 2016," and expects to "doubl[e] its market share" with small businesses and its

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[13] Charles Carr, Yankee Group, *Forecast: Carrier Ethernet Is Finally Unleashed* at 4 (Apr. 26, 2011).

[14] *See Year-End 2011 Leaderboard*.

[15] *Compare Year-End 2011 Leaderboard with* Vertical Systems Group, *Mid-2011 U.S. Business Ethernet LEADERBOARD: Competition Heats Up as Demand for Ethernet Services Remains Strong in the First Half of the Year* (Aug. 16, 2011), *available at* http://verticalsystems.com/prarticles/stat-flash-08-2011-Mid-Year-2011_Leaderboard_prnews.html.

[16] *See Year-End 2011 Leaderboard*.

[17] *See id.*

[18] *Cable Operators See More Money in Business Services*, Communications Daily, Apr. 6, 2012.

"wholesale carrier revenue over the next four years."[19] Charter's "commercial business . . . has outpaced [its] residential business substantially," and its "[r]evenue from carrier customers increased by 50% year over year and in 3Q11."[20] Cablevision recently reported that its results for 2011 were "driven primarily by a 12.7% increase in revenue from Ethernet services."[21] Optimum Lightpath recently announced that its "Ethernet revenue grew 11.1%" in the first quarter of 2012.[22]

Business Ethernet service "is a scalable, reliable and cost-efficient transport service," which provides "an attractive service option for customers migrating from ATM, Frame Relay, SONET and Private Line services."[23] Providers "are increasingly focusing on enhancing the depth of their offerings," and "there are more flavors of Ethernet available today in the market as compared to three years ago, which provides business customers with more choices."[24] Enterprise customers "are increasingly utilizing Ethernet services for domestic and international WAN networking as migration from packet services and private line services accelerates, and for metro-area connectivity."[25] Because of this influx of "multiple suppliers," "[p]ricing pressure on the carrier Ethernet services market continues to accelerate" because "Ethernet users expect a lower price per

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[19] *Cable Providers Push Into Middle Market and Enterprise Sectors*, Communications Daily, Jan. 3, 2012.

[20] Philip Cusick et al., J.P. Morgan, *Commercial Revenue Opportunity Provides Next Layer of Growth for Cable, Up 21% Y/Y in 3Q for MSOs Under Our Coverage* at 5 (Nov. 21, 2011).

[21] Cablevision Press Release, *Cablevision Systems Corporation Reports Fourth Quarter and Full Year 2011 Results*, at 2 (Feb. 28, 2012), http:www.cablevision.com/pdf/news/022812.pdf.

[22] Thomson Reuters StreetEvents, *Edited Transcript: CVC – Q1 2012 Cablevision Systems Corp. Earnings Conference Call*, at 5 (May 3, 2012).

[23] Roopashree Honnachari, Frost & Sullivan, *Demystifying Carrier Ethernet Services: No One Size Fits All*, BCS 5-02, at 1 (Apr. 6, 2011).

[24] *Id.*

[25] Nav Chandler, IDC, *U.S. Carrier Ethernet Services 2011-2015 Forecast*, IDC #231257, at 1 (Nov. 2011).

bit."[26] Business Ethernet ports in the United States grew 31 percent in 2011, as a result of "new network rollouts" and "decreased pricing,"[27] with revenues "topp[ing] $6 billion in 2011."[28]

Business Ethernet bandwidth has recently overtaken legacy bandwidth, because of " 'a 10x surge in the past five years.' "[29] Ethernet is replacing "legacy services such as SONET, Frame Relay and ATM because it provides more flexible bandwidth options and is highly scalable, which in turn makes it highly cost efficient."[30] Industry analysts predict that, based on this "growth in demand," "Ethernet revenue for the industry will generate a [compound annual growth rate] of over 20% for the foreseeable future."[31]

B. Mobile Backhaul Services

The marketplace for mobile backhaul services is also highly competitive, as the "large- scale 'mass migration' of wireless backhaul from TDM to Ethernet," requiring new fiber deployment, has been a "specific factor contributing to particularly rapid growth" of Ethernet service.[32] As a result, the marketplace is "rife with a large array of operators, including incumbent local exchange carriers (ILECs), competitive local exchange carriers (CLECs), cable multiple system operators (MSOs),

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[26] Ron Kline, Ovum, *Market Segment Profile: Carrier Ethernet* at 2 (Oct. 2011).

[27] *Id.*

[28] Vertical Systems Group, *Ethernet Services Top $6 Billion in 2011: Revenue for U.S. Ethernet Services Exceeded $6 Billion in 2011 Despite Price Compression* (Jan. 24, 2012), *available at* http://www.verticalsystems.com/prarticles/stat-flash-jan-2012_US%202011Ethernet_rev_exceeds$6B.html.

[29] Vertical Systems Group, *U.S. Ethernet Bandwidth Surpasses Legacy Bandwidth: Milestone Coincides with the MEF's Ten Year Anniversary* (July 26, 2011), *available at* http://verticalsystems.com/prarticles/stat-flash-2011-July.html.

[30] Colby Synesael & Jonathan Charbonneau, Cowen and Company, *Telecom and Data Services, Industry Overview, Fiber: A Sector Evolves* at 14 (Oct. 29, 2010), *available at* http://www.jamiescotto.com/JSA_Newsletter/documents/TelecomServices10292010.pdf.

[31] *Q2 2011 tw telecom Inc. Earnings Conference Call – Final*, FD (Fair Disclosure) Wire, Transcript 080911a4167350.750 (Aug. 9, 2011) (statement by tw telecom EVP and CFO Mark Peters).

[32] Insight Research Corporation, *Carrier and Ethernet Services: Public Ethernet in Metro & Wide Area Networks 2011-2016*, at 7 (Aug. 2011).

fiber-based providers, microwave operators, and resellers."[33] Competitive wholesalers "are being particularly aggressive in targeting new wireless backhaul opportunities," while cable operators "such as Charter Communications, Comcast Business, Cox Carrier Services and Time Warner Cable Business Class have become a credible threat in the wireless backhaul race."[34] Selling "wholesale [backhaul] services to mobile, long-distance and other competitive carriers is becoming an increasingly significant element of [MSOs'] revenue plan[s]."[35] For example, Cox "expects backhaul to account for over half its wholesale revenue in 2011, or more than $500 million," and Comcast — which has "increased [its] number of installed towers by about 79% since 2010"[36] — "anticipates the addressable backhaul market within its footprint is roughly $1 billion."[37] Analysts have found that this "[g]reater competition among vendors, as well as competing backhaul platforms, is creating downward pricing pressures for backhaul service providers; which, in turn, is impacting their revenues and profitability."[38]

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[33] Frost & Sullivan, *U.S. Mobile Backhaul Services Market: Wireless Service Provider Spending Trends*, BCS5-8, at 6 (Oct. 2011); *see also* Jennifer Pigg, Yankee Group, *4G Trends, Wholesale Mobile Backhaul: There's Gold in Them There Hauls*, at 4 (June 2011), *available at* http://www.4gtrends.com/articles/40130/wholesale-mobile-backhaul-theres-gold-in-them-ther/; Synesael & Charbonneau, *Telecom and Data Services, Industry Overview, Fiber: A Sector Evolves* at 17-18.

[34] Sean Buckley, FierceTelecom, *Telco BackHaul Strategies: Wireline Wholesale Carriers Feed Off the Wireless Backhaul Bonanza*, at 2 (Nov. 2011), ebook *available at* http://www.zayo.com/sites/default/files/fiercetelecom-mobile-backhaul-ebook11.14.11.pdf.

[35] Pigg, *Wholesale Mobile Backhaul: There's Gold in Them There Hauls* at 4.

[36] FactSet CallStreet, *Comcast Corp. Q1 2012 Earnings Call: Corrected Transcript* (May 2, 2012), http://www.files.shareholder.com/downloads/CMCSA/1847538986x0x565496/92bed363-2f65-408e-affa-42a3479ce30d/CMCSA.2012502.pdf.

[37] *Id.*

[38] Frost & Sullivan, *U.S. Mobile Backhaul Services Market: Wireless Service Provider Spending Trends* at 6.

This competition for mobile backhaul services is fueled by dramatic increases in wireless data traffic,[39] further boosting demand for backhaul service and making it necessary to upgrade to higher-capacity facilities in all areas. As Level 3 recently explained, 4G data services are "really the catalyst for the ubiquity of Ethernet and the ubiquity of fiber to the tower."[40] Demand for mobile backhaul is projected to grow by 9.7 times between 2011 and 2016.[41] The global demand for mobile backhaul equipment is projected to reach $10.4 billion in 2014 (compared to $7.2 billion in 2009).[42] Moreover, this "[g]reater competition within the mobile backhaul services market" is "having a negative effect on the prices for emerging platforms such as Ethernet."[43]

Sprint — which opposes CenturyLink's petition — has been a major beneficiary of this intense competition. Sprint recently announced that it had awarded a new set of mobile backhaul contracts to a wide variety of providers. Sprint stated that it "will end up with '*25 to 30 significant backhaul providers*' that will likely be a mix of incumbent LECs, cable MSOs and alternative carriers, all of whom will be expected to deliver Ethernet predominantly over fiber for Sprint's new multi-mode network."[44] The company has credited this growth in alternatives and "back haul flexibility" with reducing significantly its backhaul costs, telling investors that, while it previously

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[39] Commission staff reported a year ago that "mobile data demand is expected to grow between 25 and 50 times current levels within 5 years." FCC Staff Technical Paper, *Mobile Broadband: The Benefits of Additional Spectrum* at 5 (Oct. 2010), http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-302324A1.pdf.

[40] Carol Wilson, *Level 3: Mobile Backhaul Brutally Competitive*, Light Reading (Oct. 7, 2011) (video of interview with Amanda Tierney, VP Wholesale Market Management, Level 3), http://www.lightreading.com/video.asp?doc_id=213138.

[41] *See U.S. Mobile Backhaul Demand Forecast to Grow More Than Nine Times in the Next Four Years* (Mar. 13, 2012), *available at* http://www.fiercemobilecontent.com/press-releases/us-mobile-backhaul-demand-forecast-grow-more-nine-times-next-four-years.

[42] *See* Press Release, Infonetics Research, *Shift Seen in Operator Strategy for Mobile Backhaul; Equipment Spending Up 21%* (Apr. 21, 2010), http://www.infonetics.com/pr/2010/Mobile-Backhaul-and-Microwave-Market-Highlights.asp.

[43] Frost and Sullivan, *U.S. Mobile Backhaul Services Market: Wireless Service Provider Spending Trends* at 16.

[44] *See* Wilson, *Sprint to Reveal Backhaul Contract Winners Friday* (emphasis added).

was "basically a T1 organization," "[n]ow we've got the opportunity to use fiber or microwave and we choose site by site, and it's an economic decision and at times has to be a technology decision."[45] This flexibility has given Sprint "a very much improved cost structure."[46]

II. THE COMMISSION SHOULD ADHERE TO ITS LONG-STANDING APPROACH WITH RESPECT TO ENTERPRISE BROADBAND SERVICES

As shown above, the marketplace for enterprise broadband services has only become more competitive since the Commission in October 2007 issued the *AT&T Forbearance Order*. In opposing CenturyLink's petition, tw telecom, Sprint, and NASUCA do not confront any of this evidence. On the contrary, NASUCA concedes that "companies that have been granted the types of forbearance which CenturyLink seeks have experienced market losses."[47] Yet it draws precisely the wrong conclusion from that evidence, suggesting that this extensive competition justifies continuing to regulate CenturyLink's enterprise broadband services. The Commission, however, has repeatedly acknowledged that it "should not intervene in the market except where there is evidence of a market failure"[48] and that, in the absence of a marketplace failure, the Commission generally will "rel[y] on market forces, rather than regulation."[49]

Nor do any of those opposing CenturyLink's petition acknowledge that the past four-and-a-half years provide a natural experiment from which to gauge whether the forborne statutory

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[45] *Sprint 4G Strategy/Network Update – Final*, FD (Fair Disclosure) Wire, Transcript 100711a4207432.732 (Oct. 7, 2011) (statement by Steve Elfman, President, Sprint - Network Operations & Wholesale).

[46] *Id.*

[47] NASUCA Comments at 7.

[48] *Amendment of 47 CFR § 73.658(j)(1)(i) and (ii), the Syndication and Financial Interest Rules*, Tentative Decision and Request for Further Comments, 94 F.C.C.2d 1019, ¶ 107 (1983).

[49] *Orloff v. Vodafone Airtouch Licenses LLC, d/b/a Verizon Wireless*, Memorandum Opinion and Order, 17 FCC Rcd 8987, ¶ 22 & n.69 (2002) (citing this language with approval), *aff'd*, *Orloff v. FCC*, 352 F.3d 415, 420 (D.C. Cir. 2003); *see also Implementation of Sections 3(n) and 332 of the Communications Act Regulatory Treatment of Mobile Services*, Second Report and Order, 9 FCC Rcd 1411, ¶ 173(1994) ("[I]n a competitive market, market forces are generally sufficient to ensure the lawfulness of . . . terms and conditions of service by carriers who lack market power.").

provisions and regulations are necessary to remedy a marketplace failure. They are not. As Corning confirms, the Commission's forbearance decisions have "contributed to increased fiber deployment throughout the United States and promoted competition in enterprise broadband services nationwide."[50]

Instead of confronting this evidence — which speaks "directly to the question at issue" and provides "data against which to test the [relevant] proposition[s]" regarding the alleged need for these regulations[51] — tw telecom and Sprint urge the Commission to depart from the mode of analysis in the *AT&T Forbearance Order* and subsequent orders addressing similar forbearance petitions.[52] But the Commission comprehensively explained its reasons for adopting that approach in the specific context of enterprise broadband services. And none of the reasons that the Commission gave in the *Qwest Phoenix Order* for departing from its prior mode of analysis of petitions seeking forbearance from unbundling obligations apply in this context.

In the *AT&T Forbearance Order*, the Commission explained that it "continue[d] to believe" — as the Commission had determined in two earlier orders addressing broadband services — "that it is appropriate to view a broadband marketplace that is emerging and changing . . . from the perspective of the larger trends that are shaping the marketplace."[53] As a result, the Commission found it "appropriate . . . to look more broadly at competitive trends without regard to specific geographic markets," with respect to both retail and wholesale services.[54] The Commission noted — as it had in past orders — that its decision to adopt a nationwide approach was consistent with the "sophistication" of purchasers of enterprise broadband services, as well as the fact that many

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[50] Corning Comments at 1-2.

[51] *See BellSouth Telecomms., Inc. v. FCC*, 469 F.3d 1052, 1060 (D.C. Cir. 2006).

[52] *See* tw telecom Comments at 3-5; Sprint Comments at 3-4.

[53] *AT&T Forbearance Order* ¶ 20.

[54] *Id.* ¶ 20 & n.86

purchasers have "multi-location operations" and "seek the best-priced alternatives from multiple potential providers having national market presences."[55] The Commission explained further that its decision to use this approach was "entirely consistent" with both sections 7(a) and 706 of the 1996 Act, which set forth Congress's goal of promoting the deployment of broadband facilities and broadband services by reducing regulation of those services.[56]

In light of all of these factors, the Commission noted that it was not "essential" to have "detailed market share information for particular enterprise broadband services" and that, moreover, it "would not give significant weight to static market share information" in this "emerging and evolving" marketplace "in any event."[57] The Commission also noted that its refusal to insist upon static market share information in the context of enterprise broadband services is consistent with the treatment of dynamic marketplaces in the DOJ/FTC Horizontal Merger Guidelines.[58] The Commission, therefore, expressly "reject[ed] commenters' calls to base [its] analysis on such information,"[59] and the D.C. Circuit upheld that decision.[60]

Neither tw telecom nor Sprint confronts the Commission's reasoning in urging the Commission to apply the methodology from the *Qwest Phoenix Order* to CenturyLink's petition. Moreover, none of the reasons the Commission gave in that order for changing its approach to unbundling forbearance petitions applies in this context.

First, the Commission stated that, in light of "subsequent developments" in the Omaha MSA, there did "not appear to be a basis for relying on the predictive judgments" the Commission

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[55] *Id.* ¶¶ 21, 24.

[56] *Id.* ¶ 47.

[57] *Id.* ¶ 23.

[58] *See id.* ¶ 23 & n.96.

[59] *Id.*

[60] *See Ad Hoc Telecomms. Users Comm.*, 572 F.3d at 908-09.

had made.[61] As shown above, the marketplace for the services at issue here has only increased in competitiveness since the *AT&T Forbearance Order*, proving true any predictive judgments the Commission made in that order.

Second, the Commission stated that it had "not adequately explain[ed] why" it did not apply a traditional market-power analysis in the context of petitions for forbearance from unbundling obligations.[62] As shown above, the Commission provided an extensive explanation for the analysis it used in the *AT&T Forbearance Order* — including relying on statutory provisions that reflect specific congressional judgments about how best to promote broadband, which have no analog in the context of unbundling requirements for legacy PSTN facilities.

Third, the Commission stated a concern with the "focus" in the prior analysis on "the extent to which a single provider" was offering competitive, facilities-based services.[63] In the context of enterprise broadband services, however, the Commission relied on its "find[ing] that a number of entities currently provide broadband services in competition with AT&T's services" and that there are "a myriad of providers prepared to make competitive offers" for such services.[64] As shown above, such providers continue to compete successfully to provide these services today.

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[61] *Qwest Phoenix Order* ¶ 24; *see id.* ¶¶ 26, 33-36 (same).

[62] *Id.* ¶ 25; *see id.* ¶ 26 (same)

[63] *Id.* ¶ 29; *see id.* ¶¶ 30-33.

[64] *AT&T Forbearance Order* ¶ 22.

CONCLUSION

The Commission should grant CenturyLink's petition.

Respectfully submitted,

/s/ Curtis L. Groves

Edward Shakin
Curtis L. Groves
VERIZON
1320 North Courthouse Road
9th Floor
Arlington, VA 22201-2909
(703) 351-3084

Scott H. Angstreich
KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, D.C. 20036
(202) 326-7900

Counsel for Verizon

Of Counsel:

Michael E. Glover
VERIZON
1320 North Courthouse Road
9th Floor
Arlington, VA 22201-2909

May 7, 2012