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REDACTED – FOR PUBLIC INSPECTION

VIA COURIER

April 8, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *In the Matters of Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593 – Response to Data Request*

Dear Ms. Dortch:

In response to a request from the Commission staff, CenturyLink hereby submits a sample map showing the fiber owned by its competitive provider affiliate in Los Angeles, CA. Also enclosed, as Attachment A, is a justification for highly-confidential treatment of the map. Neither this letter nor Attachment A contains any highly confidential information.

A copy of this letter and the associated justification for highly confidential treatment are being simultaneously filed via ECFS in redacted format, with the appended map omitted. Two hard copies of the non-redacted version of this submission are being provided to Marvin Sacks of the Wireline Competition Bureau pursuant to the requirements of the December 27, 2010 Second Protective Order in WC Docket No. 05-25 and RM-10593, with a single copy of the non-redacted version also being provided to each of the recipients noted below.

Please contact me if you have any questions.

Sincerely,

/s/ Melissa Newman

Ms. Marlene H. Dortch
April 8, 2013

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Enclosures

Copy via email to:

William Layton (William.layton@fcc.gov)

Kenneth Lynch (Kenneth.lynch@fcc.gov)

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ATTACHMENT A

Confidentiality Justification

47 C.F.R. § 0.459

Information for which confidential treatment is sought

Pursuant to the terms of the Second Protective Order, Qwest Communications Company, LLC (“QCC”) requests highly confidential treatment of certain information it is producing in response to a request from the Commission staff in WC Docket No. 05-25 and RM-10593.¹ This information is a map that bears the legend **HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 05-25, RM-10593, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**. This information is proprietary commercially sensitive information not routinely released to the public. As such, QCC asks that the document be afforded highly confidential treatment under 47 C.F.R. § 0.459.

Commission proceeding in which the information was submitted

The information is being submitted in response to a request from Commission staff in WC Docket No. 05-25 and RM-10593.

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

This filing includes the following highly sensitive commercial information: the locations of QCC’s fiber network routes in Los Angeles. Release of such information to QCC’s competitors would allow those competitors to gain a significant advantage in the marketplace and thereby cause QCC substantial competitive harm.

¹ See *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers*, Modified Protective Order, WC Docket No. 05-25, RM-10593, DA 10-2075, 25 FCC Rcd 15168 (rel. Oct. 28, 2010) (“Modified Protective Order”); *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers*, Second Protective Order, WC Docket No. 05-25, RM-10593, DA 10-2410, 25 FCC Rcd 17725 (rel. Dec. 27, 2010) (“Second Protective Order”). QCC is indirectly wholly-owned by CenturyLink.

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

This type of information would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)). Moreover, the Wireline Competition Bureau found in the Second Protective Order that such information was deserving of highly confidential treatment.² The telecommunications and information services QCC provides are all competitive. As noted, the release of the information in question would cause QCC competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding QCC and its customers.

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

QCC has treated and treats the information disclosed in the document as highly confidential and has protected it from public disclosure.

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

At this time, QCC cannot determine any date on which this information should not be considered highly confidential.

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

Under applicable Commission and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question satisfies this test.

² Second Protective Order, 25 FCC Rcd at 17727 ¶ 6.

MAP

**REDACTED IN ITS ENTIRETY
(ONE PAGE ONLY)**

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