

September 27, 2013

VIA ECFS & HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Wave Communications' Opposition to Price Cap Carrier Elections Seeking Incremental Support in Connect America Fund Phase 1 (Round 2); WC Docket No. 10-90

Ms. Dortch:

In accord with 47 C.F.R. 54.312(c) WaveDivision Holdings, LLC ("Wave") hereby files its opposition to the elections of several price cap carriers seeking incremental Phase I Connect America Fund (CAF) support in those census blocks served by Wave. Specifically, Wave opposes the elections of CenturyLink to receive support in the census blocks identified in this filing.

Appendix A to this filing sets forth specific evidence that Wave serves the census blocks identified therein. For that reason, the Commission should deny CenturyLink's request to receive CAF Phase I incremental support in the census blocks served by Wave.

WAVE SERVES CENSUS BLOCKS AT ISSUE

In support of this opposition Wave is providing the Commission with a certification of Jim Penney, Executive Vice President – Business and Legal Affairs, certifying under penalty of perjury that the company has subscribers in and offers broadband Internet service of at least speeds of 3 Mbps / 768 kbps in each of the census blocks listed in Exhibit 1. In addition, Exhibit 1 identifies the number of subscriber homes passed by Wave (redacted to preserve customer privacy and confidential/proprietary information) in each of the census blocks at issue. This information effectively rebuts CenturyLink's claims that these census blocks are unserved or underserved.

REQUEST FOR CONFIDENTIAL TREATMENT

Pursuant to Sections 0.457 and 0.459 of the Commission's rules, Wave requests confidential treatment for those documents marked "confidential" that it is providing to the Commission in this filing. Wave requests that this information be withheld from routine public inspection because it is of a commercially-sensitive nature, contains trade secrets, and has not been previously made available to the public. In addition, some information is personally-identifiable customer information which should be withheld from public disclosure. Each page of the confidential material therein has been clearly marked "**CONFIDENTIAL—NOT FOR PUBLIC INSPECTION**". Support for Wave's request for confidential treatment is set forth in full in the attached supplemental request for confidential treatment.

Please contact the undersigned if you have any questions about this matter. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "K.C. Halm", written in a cursive style.

K.C. Halm
Counsel for WaveDivision Holdings, LLC

Encl.

cc: Ryan Yates, WCB