

May 21, 2014

VIA ECFS

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

Re: *Ex Parte Presentation in CenturyLink's Petition for Forbearance Pursuant to 47 U.S.C. § 160(c) from Dominant Carrier and Computer Inquiry Tariffing Requirements on Enterprise Broadband Services and CenturyLink's Alternative Petition for Interim Waiver of Dominant Carrier Regulation and Computer Inquiry Tariffing Requirements Imposed on Enterprise Broadband Services (WC Docket No. 14-9)*

Dear Ms. Dortch:

On May 19, 2014, Melissa Newman of CenturyLink and the undersigned met with Amy Bender of Commissioner O'Rielly's office and Nicholas Degani of Commissioner Pai's office to discuss the above-referenced matters. On May 20, Ms. Newman and the undersigned met with Priscilla Argeris of Commissioner Rosenworcel's office and Rebekah Goodheart of Commissioner Clyburn's office to discuss the same matters.

During the meetings, CenturyLink explained that the current regulatory framework places it in a uniquely disadvantageous market position relative to all of its competitors in the enterprise broadband marketplace. Specifically, in certain territories, CenturyLink faces tariffing and network-sharing obligations that have never applied to non-incumbents and from which other incumbents have received forbearance relief. This disparity places CenturyLink in an extremely difficult position as it seeks to win and retain enterprise customers requiring service to multiple premises. CenturyLink explained that well settled precedent prohibits inequitable distinctions of this type and warrants forbearance or, in the alternative, waiver of the relevant rules to permit CenturyLink to operate on the same terms as its competitors. It emphasized that Commission resolution of this matter need not prejudice any issues pending before the Commission in industry-wide rulemakings, and reiterated that the company seeks here only to be subjected to the same framework that governs other providers of enterprise broadband services until such time as the Commission chooses to revise that framework.

WILKINSON) BARKER) KNAUER) LLP

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Respectfully submitted,

/s/ Russell P. Hanser

Russell P. Hanser