

August 4, 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 July 31, 2014, Melissa Newman of CenturyLink and the undersigned met with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn, to discuss the above-referenced matters.

During the meeting, CenturyLink explained the difficulties it encounters as a result of the current regulatory framework, under which 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 from application 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. CenturyLink further discussed the recent Public Notice issued by the Wireline Competition Bureau in connection with these matters, expressing its view that its

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petition should be subjected to the same legal standard that has applied to all prior applicants seeking the relief it seeks here.

Respectfully submitted,

/s/ Bryan N. Tramont

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