

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

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In the Matter of)	
)	
QWEST COMMUNICATIONS)	
INTERNATIONAL INC.,)	
Transferor)	
)	
and)	WC Docket No. 10-110
)	
CENTURYTEL, INC. D/B/A)	
CENTURLINK,)	
Transferee.)	
)	
Application for Transfer of Control)	
Under Section 214 of the)	
Communications Act, as Amended)	
)	

COMMENTS OF ADTRAN, INC.

ADTRAN, Inc. (“ADTRAN”) files these comments on the proposed transfer of control of the licenses and authorizations held by Qwest Communications International Inc. (“Qwest”) to CenturyTel, Inc. d/b/a CenturyLink (“CenturyLink”).¹ ADTRAN is one of the leading suppliers of broadband access equipment to Tier 1, Tier 2 and Tier 3 service providers across the United States. As an equipment supplier to both Qwest and CenturyLink, ADTRAN fully support this transaction (WC Docket No. 10-110), because it will well serve the public interest by facilitating

¹ *Public Notice*, Applications filed by Qwest Communications International, Inc. and CenturyTel, Inc. d/b/a CenturyLink for Consent to Transfer of Control, DA 10-993, May 28, 2010.

the deployment of additional broadband and video capabilities and services. ADTRAN thus urges the Commission to approve the transfer of control promptly.

ADTRAN, headquartered in Huntsville, Alabama, is a leading global manufacturer of networking and communications equipment, with an innovative portfolio of more than 1,700 solutions for use in the last mile of today's telecommunications networks. ADTRAN's equipment is deployed by incumbent and competitive service providers of all sizes, as well as distributed enterprises and small and medium businesses. Importantly for purposes of the Commission's review of this transaction, ADTRAN has significant experience facilitating deployment of equipment that enables voice, data, video and Internet communications in urban and rural settings, and thus is in a position to confirm some of the claims made by CenturyLink and Qwest in support of their application.

While both CenturyLink and Qwest are significant service providers, the combination of the two companies will create an entity that will be able to furnish a broader array of services to its customers while creating a more efficient provider for telecommunications, broadband and video services. The combined company will have a national fiber network spanning over 175,000 miles within the United States. Indeed, the combination of CenturyLink and Qwest will have the national breadth and local depth to provide not only traditional local and long distance telecommunications, but also a wide range of broadband products and services including high speed Internet access, video entertainment through IPTV, data hosting and managed services, as well as fiber to cell tower connectivity and other high bandwidth services.

As the National Broadband Plan makes clear, ubiquitous deployment of broadband access is critical to the success of the United States in the global economy, and increasingly important

for our nation's education, health care, energy and civic involvement.² Deployment of very high speed broadband connections using the latest and most innovative technologies will provide the needed capacity for business and residential subscribers to take full advantage of these critical services.³ However, as a leading manufacturer of telecommunications equipment used to provide broadband service, ADTRAN can attest to the fact that that continuing deployment of these advanced broadband technologies and the accompanying network upgrades requires access to significant capital and expertise. The combined CenturyLink-Qwest will have greater access to both, thereby facilitating more widespread availability of robust broadband capabilities within these companies' operating territories. Thus, the proposed transfer of control will bring enormous benefits to the residents, businesses, schools, libraries, hospitals and governments in the areas served by CenturyLink and Qwest.

In addition, the combination of CenturyLink and Qwest will produce economies of scale that will allow advanced residential broadband and business services to be provided more widely and efficiently. The communities and community anchor institutions in the CenturyLink and Qwest serving areas will reap the benefits of these efficiencies.

ADTRAN has been working independently with CenturyLink and Qwest with regard to advanced access architectures, advanced broadband services, innovative business services and IPTV video solutions. CenturyLink and Qwest both have areas of strengths and expertise that will enable the combined entities to share experiences, knowledge and expertise gained through

Connecting America: The National Broadband Plan, issued March 16, 2010, available at <http://www.broadband.gov/download-plan/>.

³ Both CenturyLink and Qwest deploy state-of-the-art ADTRAN equipment for advanced broadband residential and Enterprise business services.

their trials, deployments and network management deployments, as well as having greater access to capital for new deployments. All of these scale and scope economies will allow the combined company to operate more effectively and efficiently, resulting in better services and service options for consumers, businesses and communities in the combined serving areas. The combined company will also be able to compete more effectively against the other video and broadband service providers now operating in their regions.

In sum, ADTRAN believes that the residential and business customers throughout the CenturyLink and Qwest territories will enjoy lower prices, greater competition and more robust services if this transaction is approved. ADTRAN thus urges the Commission to grant the transfer of control application promptly.

Respectfully submitted,

ADTRAN, Inc.

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