

Karen Brinkmann  
Direct: (202) 637-2262  
Email: karen.brinkmann@lw.com

555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004-1304  
Tel: +1.202.637.2200 Fax: +1.202.637.2201  
www.lw.com

## LATHAM & WATKINS LLP

February 4, 2011

### VIA ECFS

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

#### FIRM / AFFILIATE OFFICES

Abu Dhabi	Moscow
Barcelona	Munich
Beijing	New Jersey
Brussels	New York
Chicago	Orange County
Doha	Paris
Dubai	Riyadh
Frankfurt	Rome
Hamburg	San Diego
Hong Kong	San Francisco
Houston	Shanghai
London	Silicon Valley
Los Angeles	Singapore
Madrid	Tokyo
Milan	Washington, D.C.

Re: *Applications Filed by Qwest Communications International Inc. and CenturyTel, Inc. d/b/a/ CenturyLink for Consent to Transfer of Control, WC Docket No. 10-110*

Dear Ms. Dortch:

The Applicants write in response to a recent letter filed by the Fort Hall Business Council and the Shoshone-Bannock Tribes on January 26, 2011. CenturyLink long has been committed to serving tribal lands, and will continue to do so after closing this transaction. CenturyLink looks forward to working with the Fort Hall Business Council and Shoshone-Bannock Tribes to address and resolve their concerns.

The Tribes raise concerns about the level of service available to the Tribes and to residents of the Fort Hall Reservation. One of CenturyLink's principal areas of focus with respect to this transaction has been on improving broadband service in underserved areas within Qwest territory. To that end, CenturyLink is developing a proposal to expand and improve broadband service significantly in Qwest territory after closing. Much of this deployment effort is directed towards areas that are underserved, including tribal lands. This deployment effort is consistent with the Applicants' long-standing commitment to serving unserved and underserved communities throughout their respective territories. CenturyLink recognizes the importance and value of affordable high-speed Internet service and the importance of connecting tribal lands with robust broadband service. CenturyLink has a proud history of serving tribal lands, and will continue to focus on providing high quality service to tribes post-merger.

Indeed, a significant example of the Applicants' dedication to serving tribal lands is Qwest's current efforts to install a high speed circuit at the Shoshone-Bannock junior/senior high school in Pocatello, Idaho. Qwest's efforts will result in a 5 MB fiber-based metro optical Ethernet connection at a major anchor institution in Shoshone-Bannock territory. Intervention from the Tribes themselves, however, has served to delay the deployment of this facility.

The Tribes also raise a concern regarding documentation of rights-of-way across the Fort Hall reservation. This transaction will not have any effect on existing rights-of-way, however Qwest has been working cooperatively with the Tribes for over a year to demonstrate that it does

LATHAM & WATKINS<sup>LLP</sup>

indeed have the appropriate approvals for its fiber. Each time that the Tribes have requested documentation regarding rights of way, Qwest has cooperatively provided such documentation, and will continue to do so. The Applicants look forward to working with the Tribes to address their concerns and resolve any issues post merger.

Please contact us with any questions.

Very truly yours,

/s/

Karen Brinkmann  
Alexander Maltas  
LATHAM & WATKINS LLP

*Counsel for CenturyLink, Inc.*

cc: Bill Dever  
Sharon Gillett  
Alex Johns  
Zac Katz  
Jennifer Prime  
Christi Shewman