

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

FULL SERVICE NETWORK, TRUCONNECT  
MOBILE, SAGE TELECOMMUNICATIONS, LLC,  
and TELESCAPE COMMUNICATIONS, INC.,

*Petitioners,*

v.

FEDERAL COMMUNICATIONS COMMISSION  
and UNITED STATES OF AMERICA,

*Respondents.*

No. 15-1151 (consolidated  
with No. 15-1063 et al.)

**MOTION OF CENTURYLINK FOR LEAVE TO INTERVENE**

Pursuant to 47 U.S.C. § 402(e), 28 U.S.C. § 2348, Rule 15(d) of the Federal Rules of Appellate Procedure, and D.C. Circuit Rule 15(b), CenturyLink hereby moves for leave to intervene as of right in support of Respondents solely in the above-captioned proceeding, and not in any existing proceedings with which this petition is consolidated.

Petitioners seek review of the FCC's Report and Order on Remand, Declaratory Ruling, and Order, *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, FCC 15-24 (rel. Mar. 12, 2015) ("*Order*"). Unlike all of the other petitioners that have filed petitions to date, these Petitioners intend to argue that the FCC should have imposed even more regulation on providers of broadband Internet access service, including CenturyLink. CenturyLink actively participated

in the agency proceedings below, and its interests will be substantially affected by this Court's review of the *Order*. CenturyLink is therefore entitled to intervene as a matter of right under 28 U.S.C. § 2348.

Accordingly, CenturyLink respectfully requests that it be granted leave to intervene in support of Respondents for the purpose of supporting the FCC's decision not to impose additional regulation.

Respectfully submitted,

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/s/ David H. Solomon  
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May 26, 2015

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**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and D.C.  
Cir. Rule 26.1, CenturyLink states as follows:

The CenturyLink companies participating in this petition for review are CenturyLink, Inc. (a publicly traded company) and its wholly owned subsidiaries. CenturyLink, Inc. owns subsidiaries that provide broadband Internet access and other communications services (e.g. voice, broadband, and video) to consumers and businesses. Among the subsidiaries owned by CenturyLink, Inc. are regulated incumbent local exchange carriers. CenturyLink's local exchange carriers provide local exchange telecommunications and other communications services in 37 states, including broadband Internet access. Another subsidiary is CenturyLink Communications, LLC, which provides intrastate and interstate communications

services, both domestically and internationally, including broadband Internet access. CenturyLink, Inc. has no parent corporation, and no publicly held corporation owns 10% or more of its stock.

Respectfully submitted,

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*Counsel for CenturyLink*

May 26, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 26, 2015, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

*/s/ Russell P. Hanser*

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Russell P. Hanser