

April 17, 2019

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

Re: *Regulation of Business Data Services for Rate-of-Return Local Exchange Carriers*, WC Docket No. 17-144; *Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143; *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593

Dear Ms. Dortch:

Pursuant to the procedures outlined in the *Data Collection Protective Order*¹ I hereby submit the signed Acknowledgments of Confidentiality of myself and Henry Shi, who are acting as outside counsel; and Alexa Schneider who is acting as a legal analyst for outside counsel; to INCOMPAS, in order to obtain access to the Confidential and Highly Confidential materials filed in connection with this proceeding.

Please do not hesitate to contact me at 202-730-1320 if you have any questions regarding this submission.

Respectfully submitted,



John T. Nakahata
Counsel to INCOMPAS

cc: specialaccess@fcc.gov (via email)

Attachments

¹ *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 29 FCC Rcd. 11,657 (Wireline Comp. Bur. 2014).

APPENDIX C

Acknowledgment of Confidentiality

WC Docket No. 05-25; RM-10593

I am seeking access to [] only Confidential Information or ☒ Confidential and Highly Confidential Information.

I hereby acknowledge that I have received and read a copy of the foregoing Data Collection Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Data Collection Protective Order and that I shall not disclose or use Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, or Highly Confidential Information except as allowed by the Data Collection Protective Order.

I acknowledge that a violation of the Data Collection Protective Order is a violation of an order of the Federal Communications Commission (Commission). I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Data Collection Protective Order, including but not limited to suspension or disbarment of Counsel or Outside Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential or Highly Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Data Collection Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential or Highly Confidential Information in a manner not authorized by this Data Collection Protective Order.

I certify that I am not involved in Competitive Decision-Making.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Data Collection Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as a person described in paragraph 9 of the Data Collection Protective Order and agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents and Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Data Collection Protective Order and to ensure that there is no disclosure of Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, and Highly Confidential Information in my possession or in the possession of those who work for me, except as provided in the Data Collection Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Confidential Information and Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Data Collection Protective Order.

Executed this 17th day of April, 2019



[Name] JOHN T. N. ARAKATA

[Position] PARTNER

[Firm]

[Telephone] HARVEY, WILTSHIRE + GRUNDY, LLP

202-730-1320

Client INCOMPAS

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Executed this 19 day of April, 2019.


[Name] H. Henry Shi
[Position] Partner
[Firm] Harris Wiltshire & Gramis LLP
[Telephone] 202 730 1348
[Company] INCOMPAS

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Executed this 17 day of April, 2019

Alexa D. Schneider

[Name] Alexa D. Schneider

[Position] Legal Analyst

[Firm]

[Telephone] Harris Wiltshire & Grannis LLP

202-379-4545

[Client] INCOMPAS