

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT C

DECLARATION OF ED CAREY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Business Data Services in an Internet Protocol Environment)	WC Docket No. 16-143
)	
Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans)	WC Docket No. 15-247
)	
Special Access for Price Cap Local Exchange Carriers)	WC Docket No. 05-25
)	
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services)	RM-10593

DECLARATION OF ED CAREY

1. My name is Ed Carey. I am currently a network planner at Sprint Corporation. I have held this position for 2.5 years. As part of my job responsibilities, I negotiate and evaluate wholesale special access contracts whereby Sprint purchases such services from incumbent Local Exchange Carriers (“ILECs”) and competitive LECs (including cable companies). My evaluation includes reviewing the technology provided by the vendors, technically certifying that their services will work with the Sprint network, and negotiating pricing and coverage. Just prior to Sprint, I worked for Level 3 Communications, where I was involved in the expansion of Level 3’s fiber optic network, including the addition of buildings and the deployment of Ethernet service and fiber optic transmission equipment including DWDM (dense wave division multiplexing). I served

as the technical resource on the Level 3 Sprint Account Team. I was involved in the design, construction, and implementation phases of over 1,500 projects of this type. Prior to Level 3, I spent time with Cisco Systems and Global Crossing. I was also an Adjunct Professor teaching telecommunications management courses.

2. The purpose of this declaration is to describe the [BEGIN HIGHLY CONFIDENTIAL]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]. These rate schedules are the two companies' current offerings for purchases of new Ethernet circuits. Both companies provide two lists of prices at varying capacities – [BEGIN HIGHLY

CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]

3. In [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END

HIGHLY CONFIDENTIAL]

4. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]

5. Similarly for [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

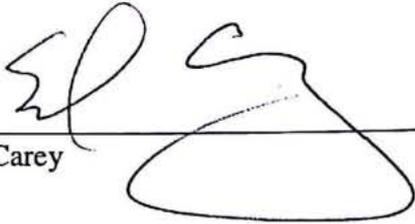
[END HIGHLY CONFIDENTIAL]

7. These pricing plans show clearly that competition drives prices lower. However, they also show that, in locations where the ILECs face no competition and thus retain market power, they are willing and able to take advantage of that market power and maintain higher prices.

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 13, 2016


Ed Carey