HWG | HARRIS, WILTSHIRE & GRANNIS LLP

1919 M STREET NW
SUITE 800
WASHINGTON DC 20036

TEL +1 202 730 1300
FAX +1 202 730 1301
HWGLAW.COM

ATTORNEYS AT LAW

July 6, 2016

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

Re: *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; *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, WC Docket No. 15-247; *Technology Transitions*, GN Docket No. 13-5; *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353

Dear Ms. Dortch:

Pursuant to the following protective orders, I hereby submit signed Acknowledgments of Confidentiality on behalf of Raul Katz of Telecom Advisory Services, LLC who is serving as a consultant to Competitive Carriers Association in these proceedings:

- *Modified Protective Order*[1] in WC Docket No. 05-25, RM-10593
- *Second Protective Order*[2] in WC Docket No. 05-25, RM-10593
- *Data Collection Protective Order*[3] in WC Docket No. 05-25, RM-10593
- *Technology Transitions Protective Order*[4] in GN Docket Nos. 13-5 and 12-353

---

[1] *See Special Access Rates for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010) ("*Modified Protective Order*").

[2] *See Special Access Rates for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010) ("*Second Protective Order*").

[3] *See Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Order and Data Collection Protective Order, DA 14-1424, 29 FCC Rcd. 11,657 (Wireline Comp. Bur. 2014) ("*Data Collection Protective Order*").

[4] *See Technology Transitions AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014) ("*Technology Transitions Protective Order*").

- *Second Technology Transitions Protective Order*[5] in GN Docket Nos. 13-5 and 12-353
- *Business Data Services Data Collection Protective Order*[6] in WC Docket Nos. 15-247 & 05-25, RM-10593
- *Tariff Investigation Protective Order*[7] in WC Docket Nos. 15-247 & 05-25, RM-10593

Pursuant to the *Modified Protective Order* and the *Second Protective Order*, this filing has been served on submitting parties and a certificate of service is attached.

Please note that the undersigned, who has already signed onto the above-referenced protective orders, is also serving as counsel in this proceeding to Competitive Carriers Association.

Please contact me at 202-730-1322 if you have any questions regarding this submission.

Respectfully submitted,

Jennifer P. Bagg
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street NW
The Eighth Floor
Washington, DC 20036
jbagg@hwglaw.com
Counsel to Sprint Corporation

cc: specialaccess@fcc.gov (via email)
tariffinvestigation@fcc.gov (via e-mail)

---

[5] *See Technology Transitions AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014) ("*Second Technology Transitions Protective Order*").

[6] *See Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Order, DA 15-1387, 30 FCC Rcd. 13,680, at App. A (Wireline Comp. Bur. 2015) ("*Business Data Services Data Collection Protective Order*").

[7] *See id.* at App. B ("*Tariff Investigation Protective Order*").

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 05-25, RM 10593

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceedings, and I understand it. I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission.

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 Protective Order is due solely to my capacity as Counsel or consultant to a party or other person described in paragraph 4 of the foregoing Protective Order and that I will not use such information in any other capacity, nor will I disclose such information except as specifically provided in the Protective Order.

I hereby certify that I am not involved in "competitive decision-making" as that term is used in the definition of In-House Counsel in paragraph 4 of the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Confidential Documents and Confidential Information are used only as provided in the Protective Order; and (2) Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order.

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

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

Executed at Stanfordville, NY this 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Address] Telecom Advisory Services, LLC
[Telephone] (845) 868-1653

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 05-25, RM-10593

I hereby acknowledge that I have received and read a copy of the foregoing Second Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Second Protective Order and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Second Protective Order. I acknowledge that a violation of the Second Protective Order is a violation of an order of the Federal Communications Commission.

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 public interest organization), I acknowledge specifically that my access to any information obtained as a result of the Second Protective Order is due solely to my capacity as Outside Counsel or Outside Counsel of Record or Outside Consultant to a party or other person described in paragraph 9 of the foregoing Second Protective Order and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Second Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Second Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Second Protective Order, and I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

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

Executed at Stanfordville, NY this 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Address] Telecom Advisory Services, LLC
[Telephone] (845) 868-1653

APPENDIX

Acknowledgment of Confidentiality

GN DOCKET NOS. 13-5 & 12-353

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

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

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

I acknowledge that nothing in the Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential Information in a manner not authorized by this 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 Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as a person described in paragraph 8 of the foregoing 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 are not duplicated except as specifically permitted by the terms of the Protective Order, and to ensure that there is no disclosure of Stamped Confidential Documents or Confidential Information in my possession or in the possession of those who work for me except as specifically permitted by the terms of the Protective Order.

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

Capitalized terms used herein shall have the meanings ascribed to them in the Protective Order.

Executed this 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Firm] Telecom Advisory Services, LLC
[Telephone] (845) 868-1653

APPENDIX B

Acknowledgment of Confidentiality

GN Docket Nos. 13-5 & 12-353

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

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

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

I acknowledge that nothing in the Second Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Highly Confidential Information in a manner not authorized by the Second 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 Second Protective Order is due solely to my capacity as Outside Counsel or Outside Consultant to a party or as a person described in paragraph 11 of the foregoing Second 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 Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Second Protective Order and to ensure that there is no disclosure of Stamped Highly Confidential Documents or Highly Confidential Information in my possession or in the possession of those who work for me, except as specifically permitted by the terms of the Second Protective Order.

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

Capitalized terms used herein shall have the meanings ascribed to them in the Protective Order or the Second Protective Order.

Executed this 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Firm] Telecom Advisory Services LLC
[Telephone] (845) 868-1653

APPENDIX C

Acknowledgment of Confidentiality

WC Docket No. 05-25; RM-10593

I am seeking access to [ ] only Confidential Information or [X] 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 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Firm] Telecom Advisory Services LLC
[Telephone] (845) 868-1653

APPENDIX A
Attachment 1

Business Data Services Data Collection Protective Order
Acknowledgment of Confidentiality
WC Docket No. 15-247

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

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

I agree that I am bound by the Business Data Services 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 Business Data Services Data Collection Protective Order.

I acknowledge that a violation of the Business Data Services 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 Business Data Services 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 Business Data Services 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 Business Data Services 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 Business Data Services 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 6 of the Business Data Services 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 Business Data Services 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 Business Data Services 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 Business Data Services Data Collection Protective Order.

Executed this 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Firm] Telecom Advisory Services LLC
[Name of Client(s) Representing] CCA
[Telephone] (845) 868-1653

APPENDIX B
Attachment 2

Tariff Investigation Protective Order
Acknowledgment of Confidentiality
WC Docket No. 15-247

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

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

I agree that I am bound by the Tariff Investigation 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 Tariff Investigation Protective Order.

I acknowledge that a violation of the Tariff Investigation 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 Tariff Investigation Protective Order, including but not limited to suspension or disbarment of Counsel or 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 Tariff Investigation 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 Tariff Investigation 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 Tariff Investigation Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as an employee of Counsel, Outside Consultant, or Outside Firm, and I 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 Tariff Investigation Protective Order and to ensure that there is no disclosure of Confidential Information or Highly Confidential Information in my possession, in the possession of those who work for me or in the possession of other Support Personnel, except as provided in the Tariff Investigation 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 Tariff Investigation Protective Order.

Executed this 5 day of July, 2016

[Name] RAUL KATZ
[Position] President
[Firm] Telecom Advisory Services LLC
[Telephone] (845) 868-1653
[Party] CCA

CERTIFICATE OF SERVICE

I, Madeline Salinas, do hereby certify that on this July 6, 2016, I caused a copy of the foregoing letter and Acknowledgments of Confidentiality to be served by postage pre-paid mail on the following:

Thomas Jones
Nirali Patel
Willkie Farr & Gallagher LLP
1875 K. Street, N.W.
Washington DC 20006
Outside Counsel for Level 3 Communications, LLC, TDS Metrocom, LLC, MegaPath Corporation, TelePacific Communications, 360 Networks, Cbeyond Communications, LLC, BT Americas, Inc., and tw telecom

Andrew Fisher
Comcast Corporation
One Comcast Center – 50th Floor
Philadelphia, PA 19103
Inside Counsel – Comcast Corporation

Thomas Cohen
Kelley Drye & Warren LLP
3050 K Street, N.W.
Suite 400
Washington, DC 20007
Outside Counsel for Covad Communications Group, Inc., XO Communications, LLC, and American Cable Association

Traci Tidmore
EarthLink Business
7037 Old Madison Pike
Huntsville, AL 35806
Regulatory Counsel for EarthLink Business

Jarrett S. Taubman
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, DC 20004
Outside Counsel for Time Warner Cable

Joseph Kahl
RCN Telecom Services, LLC
650 College Road East
Suite 3100
Princeton, NJ 08540
Sr. Director, Regulatory and External Affairs
Warner Cable

Jason E. Rademacher
Cooley LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004
Outside Counsel for Cox Communications

David L. Lawson
Sidley Austin LLP
1501 K. Street, N.W.
Washington, DC 20005
Outside Counsel for AT&T

Michael J. Mooney
Level 3 Communications, LLC
1025 Eldorado Blvd.
Broomfield, CO 80021
General Counsel, Regulatory Policy

Tamar E. Finn
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006
Outside Counsel for TDS Metrocom, LLC

Colleen Boothby
Levine, Blaszak, Block & Boothby, LLP
2001 L Street, N.W.
Suite 900
Washington, DC 20036
Counsel for Ad Hoc Telecommunications Users Committee

AJ Burton
Frontier Communications
2300 N Street, N.W.
Suite 710
Washington, DC 20037
Counsel for Frontier Communications

Craig J. Brown
1099 New York Avenue, N.W.
Suite 250
Washington, DC 20001
Counsel for CenturyLink

Grant B. Spellmeyer
U.S. Cellular
8410 W. Bryn Mawr Avenue
Chicago, IL 60631
Outside Counsel for U.S. Cellular

Suzanne K. Toller
Davis Wright Tremaine LLP
505 Montgomery Street
San Francisco, CA 94111
Outside Counsel for T-Mobile USA, Inc.

Evan T. Leo
Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, DC 20036
Outside Counsel for Verizon and Verizon Wireless

Karen Brinkmann
Karen Brinkmann, PLLC
2300 N Street, NW
Suite 700
Washington, DC 20037
Outside Counsel for FairPoint Communications, Inc.

/s/ Madeline Salinas