Parrish, Blessing & Associates, Inc.
Economic Consultants

July 21, 2016

VIA Electronic Comment Filing System

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

RE: Acknowledgement of Confidentiality, WC Docket Nos. 16-143, 15-247, 05-25; RM-10593

Dear Ms. Dortch:

Enclosed are executed copies of my Acknowledgement of Confidentiality required by the Wireline Competition Bureau in: (1) the modified Protective Order (DA 10-2075), for access to Stamped Confidential Documents and Confidential Information in the Second Protective Order (DA 10-2419), Appendix A, for access to Stamped Highly Confidential Documents and Highly Confidential Information filed in Docket No. 05-25 and RM-10593; (2) the Data Collection Protective Order (DA 14-1424), Appendix C, for access to Confidential and Highly Confidential documents filed in Docket No. 05-25 and RM-10593; and (3) the Modified Protective Order.

In addition, enclosed is my signed Recipient Acknowledgement for access to the unredacted version of the Tariff Investigation Order and Further Notice of Proposed Rulemaking in the above-captioned dockets.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Kristoffer Carson
Director
Parrish, Blessing & Associates, Inc.
kcarson@pbanda.com

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 Fairfax, VA this 21st day of July, 2016

[Name] Kristofter Carson
[Position] Director, Parrish, Blessing + Associates, Inc.
[Address] 3975 University Drive, Suite 215 Fairfax, VA 22030
[Telephone] 703-352-4830

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 Fairfax, VA this 21st day of July, 2016

[Name] Kristoffer Carson
[Position] Director, Parrish, Blessing & Associates, Inc.
[Address] 3975 University Drive, Suite 215 Fairfax, VA 22030
[Telephone] 703-352-4830

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 21st day of July, 2016

[Name] Kristoffer Carson
[Position] Director
[Firm] Parrish, Blessing & Associates, Inc.
[Telephone] 703-352-4830

Highly Confidential
Tariff Investigation Order and Further Notice of Proposed Rulemaking
Recipient Acknowledgment

Business Data Services Rulemaking
WC Docket Nos. 16-143, 15-247, 05-25; RM-10593

By signing below, you certify that you are Outside Counsel or Outside Consultant (as such terms are defined in the protective orders in WC Docket Nos. 16-143, 15-247, No. 05-25).[1] You agree that you will not make any photocopies of the unredacted version of the Tariff Investigation Order and Further Notice of Proposed Rulemaking (Order)[2] in this proceeding and that, as required by the protective orders, you will not share any Highly Confidential or Confidential Information (howsoever designated in the Order) except as provided for in the protective orders. You acknowledge the provisions of the protective orders do not terminate at the conclusion of this proceeding. You further acknowledge that any use of the Highly Confidential or Confidential Information contained in the unredacted version of the Order that violates any term or condition found in the protective orders constitutes a violation of an order of the Federal Communications Commission.

> I acknowledge that I have read the above paragraph and agree to its terms. I provided Commission staff with a copy of my signed Acknowledgments from the protective orders.[3] I confirm that any challenge to such Acknowledgment has been resolved in my favor and the Acknowledgment remains in full force and effect.

By: _____
Name: Kristofer Carson
Title: Director
Organization: Parish, Blessing & Associates, Inc.
Party representing: ACS

Date: 7/21/2016

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[1] *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*, WC Docket No. 05 25, RM-10593, Order and Modified Data Collection Protective Order, 30 FCC Rcd 10027 (WCB 2015); Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) (*Data Collection Protective Order*); Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) (*Second Protective Order*); Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) (*Modified Protective Order*).

[2] *Business Data Services in an Internet Protocol Environment Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans; Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket Nos. 16-143, 15-247, 05-25, RM-10593, Tariff Investigation Order and Further Notice of Proposed Rulemaking, FCC 16-54 (rel. May 2, 2016).

[3] *See Data Collection Protective Order*, 29 FCC Rcd at 11680, Appx. C; *Second Protective Order*, 25 FCC Rcd at 17733, Appx. A; *Modified Protective Order*, 25 FCC Rcd at 15175, Appx. A.