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**REDACTED - FOR PUBLIC INSPECTION**

August 10, 2016

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

**VIA ECFS**

Re: XO Holdings Eighth Response to Information and Document Request  
dated June 22, 2016; WC Docket No. 16-70

Dear Ms. Dortch:

The enclosed letter responds, in part, to the Information and Document Request issued by the Federal Communications Commission (“FCC” or “Commission”) on June 22, 2016 to XO Holdings (“XO”) and Verizon Communications Inc. in connection with the Commission’s investigation of the proposed acquisition of XO Communications, LLC by Verizon Communications Inc.

In accordance with the Protective Order (DA 15-567) in this proceeding, this filing consists of a redacted copy of XO’s submission to the Commission.

Copies of the Highly Confidential version of the filing, including accompanying documents, are being submitted to the Secretary’s Office and Commission staff via hand delivery under separate cover.

**REDACTED FOR PUBLIC INSPECTION**

Marlene H. Dortch  
August 10, 2016  
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Should you have any questions, please contact the undersigned.

Sincerely,



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Enclosures  
cc: Michael Ray and Zachary Ross (via e-mail)

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August 10, 2016

**CONFIDENTIAL AND HIGHLY CONFIDENTIAL INFORMATION –  
SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 16-70  
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**VIA HAND DELIVERY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Re: XO Holdings Fourth Response to Information and Document Request dated June 22, 2016; WC Docket No. 16-70

Dear Ms. Dortch:

This letter responds, in part, to the Information and Document Request issued by the Federal Communications Commission (“FCC” or “Commission”) on June 22, 2016 to XO Holdings (“XO”) and Verizon Communications Inc. in connection with the Commission’s investigation of the proposed acquisition of XO Communications, LLC by Verizon Communications Inc. (hereafter, the “Request”).

Specifically, this Response, made solely on behalf of XO, includes a supplemental response to Request 19. The Response supplements XO’s previous submissions of documents and information in response to the Request and additional documents and information will be provided on a rolling basis. XO will submit signed certificates of compliance upon completion of its response.

**CONFIDENTIAL AND HIGHLY CONFIDENTIAL INFORMATION –  
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**SPECIFIC RESPONSES TO REQUESTS**

**GENERAL**

**REQUEST NO. 19:**

*Describe Verizon’s post-closing plans concerning XO’s services provided via Ethernet over Copper (“EoC”). In addition:*

- a. Provide all documents in Verizon’s or XO’s possession that discuss XO’s EoC-based service, including strategic plans, deployment plans, pricing, and competitive environment.*
- b. Does Verizon plan to continue providing EoC-based service to existing purchasers everywhere it is currently available from XO?*
- c. Will Verizon honor existing XO contracts or purchase arrangements for EoC service?*
- d. Submit all documents discussing any planned, potential, or actual XO migration of its non-facilities-based connections to its own facilities (whether over XO’s facilities or an indefeasible right of use).*
- e. Describe the extent to which EoC is a competitive alternative to BDS provided over fiber and any other business broadband services provided by Verizon over fiber.*

**XO RESPONSE:** XO previously responded to this request on July 28, 2016. Pursuant to a follow up request from Commission staff, XO supplements its response as follows:

XO sells Ethernet service to commercial customers, and, although it will identify to the customer whether the service is provided over copper (Ethernet over Copper (“EoC”)), it believes all Ethernet services are part of a single market regardless of the transmission medium. In other words, EoC is just another technology for offering Ethernet service. Further, EoC equipment is readily available from equipment vendors, and there is no material difference in the technology underlying this equipment. Thus, EoC service providers – like fiber-based Ethernet service providers – distinguish the service offering based on price and speed.

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XO knows the following entities are among the competitive local exchange providers that offer EoC in XO's service area: Megapath, Windstream, Telepacific, Alpheus, and Broadview Networks. XO also knows that AT&T uses EoC technology but offers it as part of its ASE product, which also might use fiber as a transmission medium.

\* \* \*

Please do not hesitate to contact me if you have any questions regarding XO's Response.

Sincerely,



Thomas W. Cohen

cc: Michael Ray and Zachary Ross (via e-mail)