

November 11, 2019

Via ECFS

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

Re: 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 10-593); 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, please find the attached certifications of compliance regarding the destruction of Confidential and Highly Confidential documents in the above-captioned 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 *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10- 2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010).

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

³ *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015).

⁴ *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).

ONE BEACON STREET, SUITE 2600, BOSTON, MA 02108

- *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 No. 15-247
- *Tariff Investigation Protective Order*⁷ in WC Docket No. 15-247

By filing via ECFS, this certification has been delivered to Counsels for the Submitting Parties.

Please contact me if you have any questions about this submission.

Sincerely,



Barbara Levine
General Counsel

Enclosures

⁵ *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).

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

⁷ *Id.* at App. B.

CERTIFICATION

To the best of my knowledge and belief, I have destroyed or caused to be destroyed any Stamped Confidential and Highly Confidential Documents, and any material containing or derived from Confidential and Highly Confidential Information, and all copies of the same, to the extent required by the Protective Orders¹ in the above-captioned proceedings.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on November 11, 2019.

A handwritten signature in cursive script, reading "Sera McCarthy", written over a horizontal line.

Sera McCarthy
Senior Administrative Assistant
The Brattle Group

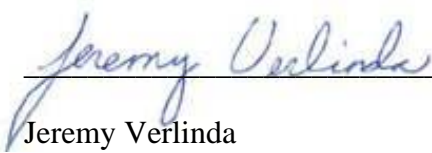
¹ *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; 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; 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); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

CERTIFICATION

To the best of my knowledge and belief, I have destroyed or caused to be destroyed any Stamped Confidential and Highly Confidential Documents, and any material containing or derived from Confidential and Highly Confidential Information, and all copies of the same, to the extent required by the Protective Orders¹ in the above-captioned proceedings.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on November 11, 2019.



Jeremy Verlinda
Principal
The Brattle Group, Inc.

¹ *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *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; 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); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

CERTIFICATION

To the best of my knowledge and belief, I have destroyed or caused to be destroyed any Stamped Confidential and Highly Confidential Documents, and any material containing or derived from Confidential and Highly Confidential Information, and all copies of the same, to the extent required by the Protective Orders¹ in the above-captioned proceedings.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on November 11, 2019.

A handwritten signature in dark ink, appearing to read "William Zarakas", is written over a horizontal line.

William Zarakas
Principal
The Brattle Group, Inc.

¹ *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *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; 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); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

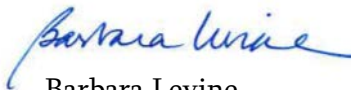
CERTIFICATION

The following individuals who signed onto the Protective Orders¹ are no longer employed by The Brattle Group, Inc. To the best of my knowledge and belief, any of their Stamped Confidential and Highly Confidential Documents, and any material containing or derived from Confidential and Highly Confidential Information, and all copies of the same, have been destroyed to the extent required by the Protective Orders.

- Linyan Zhu
- Robert Reynolds
- Mitchell Levy
- Melissa Wang
- James Wieler
- Weichen (Ben) Zhao
- Kevin Hearle
- Robert Wilson

I certify under penalty of perjury that the foregoing is true and correct.

Executed on November 11, 2019.



Barbara Levine
General Counsel
The Brattle Group, Inc.

¹ *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *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; 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); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).