

Declaration of Christopher B. Raper

1. My name is Christopher B. Raper. I am currently Vice President – Consumer Analytics for Windstream. My responsibilities include, among other things, managing Windstream’s use of internal and external data to determine customer behavior from a variety of product, geography, and other perspectives.

2. The purpose of this Declaration is to describe the manner in which Windstream has concluded that, in the 2,450 entries listed on its Form 505 Response, each representing an instance in which another provider made an unserved-to-served challenge with respect to a census block (CB), (1) Windstream did not port a telephone number used to serve a Windstream customer who also subscribed to broadband to another provider of fixed Internet Access during the period July 2013 through June 2014 in the CB, and (2) there was no evidence of Internet Protocol (IP) traffic during the period July 2013 through June 2014 in the CB that is specifically related to the competitor that is claiming that the CB is served. The results of these analyses indicate that the 2,448 unique CBs represented in the 2,450 entries on Windstream’s Form 505 Response are not in fact served by an unsubsidized competitor.

3. Windstream’s “Porting Analysis,” introduced in subparagraph (1) above, began by developing an electronic file containing records of all instances in which a local telephone number was ported from Windstream to another carrier for the 12-month period of July 2013 through June 2014, including, among other things, telephone number and the ported-to carrier.

4. The porting data was then associated with archived customer profile data for that period that included, among other things, service telephone number and whether the customer subscribed to broadband from Windstream at any speed. These profiles were matched to CBs

using data provided by a third-party vendor. This process yielded a data set that showed how many ports occurred in a CB during that time period.

5. For all of the 2,450 entries included in Windstream's Form 505 Response, this analysis showed no ports to a wireline provider in the relevant CB for the time period.

6. Windstream's "IP Traffic Analysis," introduced in subparagraph (2) above, is based on the premise that if a particular provider is offering broadband service in a given CB, there will be some evidence of IP traffic in that CB that is linked to an IP address registered to that provider.

7. The American Registry for Internet Numbers (ARIN) manages the allocation and assignment of IP addresses in blocks to particular Internet service providers and maintains a registry of those assignments. Windstream is thus able to link IP addresses to specific providers.

8. Windstream worked with a well-known third-party vendor to determine the Internet service providers used by households in each of the subject CBs, as well as the number of households accessing the Internet through each Internet service provider over the relevant twelve-month time period. Log data collected by this third-party vendor in the ordinary course of business contains transaction records of more than 1 billion online URL requests daily, which includes IP addresses as they traverse IP points of presence. This data is maintained by the vendor for thirteen months for business purposes, including analytics. Leveraging both standard geocoding attributes and proprietary data analytics algorithms, this vendor is able to geocode IP address in a similar manner by which a company is able to target location-based advertising to a particular computer. Therefore, this vendor is able to geocode the observed internet activity to a particular location—and therefore CB—and link the traffic to a particular Internet service.

9. If the IP Traffic Analysis showed evidence of IP activity in a given CB, Windstream then cross-referenced this data with the Form 505 data to determine whether, for that CB, the IP activity is associated with an Internet service provider or providers that filed a valid Form 505 unserved-to-served challenge.

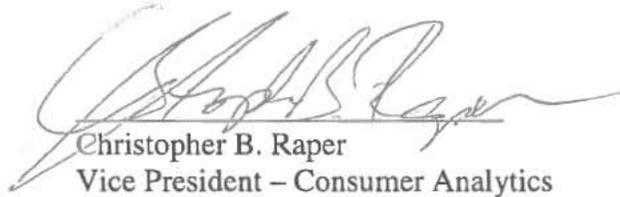
10. For all of the 2,450 entries included in Windstream's Form 505 Response, this analysis showed no evidence of IP traffic specifically related to the competitor that is claiming that the CB is served.

11. The 2,450 entries listed on Windstream's Form 505, constituting Windstream's response to others' unserved-to-served challenges, showed both no qualifying port in the Porting Analysis and no relevant IP activity in the IP Traffic Analysis in the relevant CB.

12. I personally oversaw the implementation of the processes that I describe above.

I declare that the foregoing is true to the best of my knowledge, information and, belief.

Dated November 10, 2014


Christopher B. Raper
Vice President – Consumer Analytics