January 29, 2015
Via ETFS Filing

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FOR PUBLIC INSPECTION

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

RE: U.S. TelePacific Corp.
FRN 0003733813
Special Access Data Collection
WC Docket No. 05-25, RM10593

Dear Ms. Dortch,

Attached are the public versions of the essay responses for the above referenced Special Access Data Collection proceedings, submitted on behalf of U.S. TelePacific Corp. ("Company") and in accordance with *Order and Data Collection Protection Order*, DA 14-1424, adopted October 1, 2014.

The Company's responses have also been submitted via the Special Access Web Portal.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel
Consultant to U.S. TelePacific Corp.

cc: Nancy Lubamersky - TelePacific
file: TelePacific - FCC Special Access
tms: FCCx1501

CR/gs

CERTIFICATION

I have examined the responses and certify that, to the best of my knowledge, all statements of fact, data, and information contained therein are true and correct.

Signature: /s/ Nancy Lubamersky

Printed Name: Nancy Lubamersky

Title: VP Strategic Initiatives and Public Policy

Date: January 29, 2015

HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

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Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of U.S. TelePacific Corp.
FRN: 0003733813
Question II.A.5

Question: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response:

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Response of U.S. TelePacific Corp.
FRN: 0003733813
Question II.A.8

Question: Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

Response:

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Response of U.S. TelePacific Corp.
FRN: 0003733813
Question II.A.8.a

Question: Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

Response:

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Question II.A.8.b

Question: Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

Response:

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Question II.A.8.c

Question: In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response:

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Response of U.S. TelePacific Corp.
FRN: 0003733813
Question II.A.10

Question: Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response:

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Question II.A.18

Question: If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS.

Response:

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Question II.A.19

Question: Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

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Question II.D.1.

Question: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

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Question II.D.2.

Question: Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response:

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Question II.F.8.a-f

Optional Question:

Explain whether the terms and conditions of any Tariff or contract to which you are a party for the purchase of Dedicated Services or the policies of any of your Providers constrain your ability to:

a. Decrease your purchases from your current Provider(s);
b. Purchase services from another Provider currently operating in the geographic areas in which you purchase services;
c. Purchase non-tariff services, such as Ethernet services, from your current Provider of tariff DS1, DS3, and/or PBDS services or from other Providers operating in the geographic areas in which you purchase tariffed services;
d. Contract with Providers that are considering entering the geographic areas in which you purchase tariff services;
e. Move circuits, for example, moving your DS1 and/or DS3 End-User Channel Terminations to connect to another Transport Provider; or
f. Otherwise obtain Dedicated Services or change Providers.

Response:

Company does not have any comments.

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Question II.F.9.a-e

Optional Question:

If you purchase, or purchased, Transport Service and End User Channel Terminations from the same Provider, explain your experience with changing Transport Service from one Provider to another between January 1 and December 31, 2013 while keeping your End User Channel Terminations with the original Provider. Where appropriate, identify the Provider(s) in your responses below and indicate whether they are an ILEC or a Competitive Provider.

a. How many times did you change Transport Service while keeping your End User Channel Terminations with the original Provider? An estimate of the number of circuits moved to a new Transport Provider, or the number of such changes requested, is sufficient.

b. What was the length of time, on average, it took for the original Provider to complete the process of connecting your last-mile End-user Channel Terminations to another Transport Provider? An estimate is sufficient.

c. Were you given the opportunity to negotiate the amount of time it would take to complete the process of connecting your End User Channel Terminations to another Transport Provider on a case-by-case basis? In answering this question, also describe and provide citations to the ILEC's or Competitive Provider's policies, rules or, where relevant, Tariff provisions, if known, explaining the transition process.

d. How did connecting to a new Transport Provider impact the rate you paid for the End User Channel Terminations you continued to purchase from the original Provider?

e. Did connecting to a new Transport Provider typically impact the rate you continued to pay for Transport Service from the original Provider while the change in Transport Providers remained pending? If so, how? What was the average percentage change in rates? For example, did you ever pay a One Month Term Only Rate during that time?

Response:

Company does not have any comments.

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Question II.F.10.a-g

Optional Question:

Describe any circumstances since January 1, 2013, in which you have purchased circuits pursuant to a Tariff, solely for the purpose of meeting a Prior Purchase-Based Commitment required for a discount or Non-Rate Benefit from your Provider (i.e., you would not have purchased the circuit but for the requirement that you meet a Volume Commitment required for a discount or Non-Rate Benefit from your Provider). In your description, provide at least one example, which at a minimum, lists:

a. The name of the Provider providing the circuits at issue;
b. A description of the Prior Purchase-Based Commitment;
c. The Tariff and section number(s) of the specific terms and conditions described;
d. The number of circuits you would not have purchased but for the Prior Purchase-Based Commitment requirement to receive a discount or Non-Rate Benefit;
    i. Of the circuits reported in II.F.10.d, how many did you not use at all?
e. A comparison of the dollar amount of the unnecessary circuit(s) purchased versus the dollar amount of penalties your company would have had to pay under the Prior Purchase-Based Commitment had it not purchased and/or maintained the circuit(s), and a description of how that comparison was calculated.
f. How many circuits were activated under the identified Tariff plan and not used when you initially entered into the plan? What were these unused circuits as a percent of the total circuits currently purchased under this Tariff plan? Indicate the percent of the total circuits currently purchased under this Tariff plan that exceed your Prior Purchase-Based Commitment.
g. For the Prior Purchase-Based Commitment, indicate whether you are able to buy any DS1s or DS3s from the Provider outside of the identified Tariff plan, or are you required to make all purchases from the Provider pursuant to the identified Tariff plan?

Response:

Company does not have any comments.

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Question II.F.11

Question: For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing *End-User Channel Terminations* from one *Provider* of *Dedicated Services* to another.

Response:

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Question II.F.12.

Question: Explain the circumstances since January 1, 2013 under which you have paid One Month Term Only Rates for DS1, DS3, and/or PBDS services and the impact, if any, it had on your business and your customers. In your response, indicate any general rules you follow, if any, concerning the maximum number of circuits and maximum amount of time you will pay One Month Term Only Rates, and your business rationale for any such rules.

Response:

Company does not have any comments.