

February 2, 2015

**VIA ECFS**

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

Re: *Special Access Data Collection, WC Docket No. 05-25, RM-10593*

Dear Ms. Dortch:

In accordance with the Order and Data Collection Protective Order entered in the captioned proceeding,<sup>1</sup> Confidential Submitting Party, by undersigned counsel, submits the non-confidential and redacted version of its Confidential responses to the Special Access Data Collection essay questions submitted via the Special Access Web Portal. The fact of Confidential Submitting Party's response and submission to the SPADC in and of itself is Confidential, and it accordingly is filing redacted versions of its submitted essays via ECFS on a Confidential basis.

Because there is apparently no unique, anonymous identifier associated with its submission via the Special Access Web Portal that can be included herewith so that Commission staff may link this filing with Confidential Submitting Party's submission (such as a file number or receipt number), a separate copy of this letter and all attachments are being sent to the Special Access email address, SPADC@fcc.gov.

Respectfully submitted,

**CONFIDENTIAL SUBMITTING PARTY**

By: /s/ Martin L. Stern

Martin L. Stern

Jennifer E. Paul

K&L Gates LLP

1601 K Street, N.W.

Washington, DC 20006

202-778-9000

*Its Attorneys*

cc: Special Access Data Collection Staff

---

<sup>1</sup> *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593, Order and Data Collection Protective Order, Appendix A, DA 14-1424, (rel. Oct. 1, 2014).

EXPLANATORY ATTACHMENT

[REDACTED]

[REDACTED]  
[REDACTED] is responding to the Federal Communications Commission’s (“FCC” or “Commission”) Special Access Mandatory Data Collection as a *Purchaser* of *Dedicated Services* based on its 2013 expenditures on *Dedicated Services* exceeding \$5 million.<sup>1</sup>

The [REDACTED] entities that are *Purchasers* of *Dedicated Services* covered by this submission are:

Entity	FRN
[REDACTED]	[REDACTED]

The information of the above [REDACTED] entities is being reported in response to section II.F of the Data Collection, which covers “Other Purchasers.”

Revenues reported for Question II.F.2 do not include [REDACTED], which do not appear to be within the definition of *Dedicated Services*.

Note -- Highlighted text deemed confidential.

<sup>1</sup> Mandatory Data Collection (September 2014) (“Data Collection”), available at [http://transition.fcc.gov/wcb/Data\\_Questions091514.pdf](http://transition.fcc.gov/wcb/Data_Questions091514.pdf). Capitalized, italicized terms used herein are references to terms defined in the Data Collection.

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

II.F.11



Note -- Highlighted text deemed confidential.