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February 20, 2015

REDACTED-FOR PUBLIC INSPECTION

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

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

Dear Secretary Dortch:

In response to the Federal Communications Commission's Special Access Data Collection, Harron Communications, L.P. ("Harron"), hereby submits its essay responses suitable for public inspection, including redacted versions of its confidential and highly confidential information. Pursuant to the Protective Order adopted in this proceeding¹, all pages of this filing are marked "REDACTED-FOR PUBLIC INSPECTION."

Versions of the essay responses containing Confidential and Highly Confidential information as defined by the Protective Order and the data container containing Highly Confidential information as defined by the Protective Order have been submitted via the Commission's Special Access Web Portal.

¹ *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 Regulations of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) ("Protective Order.")*.

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Any questions relating to the enclosed materials may be directed to Ryan Pearson of Harron at (610) 993-1007 or to the undersigned.

Respectfully submitted,

A handwritten signature in blue ink that reads "Thomas Cohen". The signature is written in a cursive style with a long horizontal stroke at the end.

Thomas Cohen

cc: Ryan Pearson

Enclosure

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Harron Communications, L.P., FRN: 0016642761

Question II.A.5: Fiber Network Map

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

[BEGIN HIGHLY CONFIDENTIAL]



[END HIGHLY CONFIDENTIAL]

Harron submitted the required Fiber Network Map via the Special Access Web Portal.

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- c. 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

[BEGIN HIGHLY CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [END HIGHLY CONFIDENTIAL]

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Harron Communications, L.P., FRN: 0016642761

Question II.A.10: Geographic Areas Marketed

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.

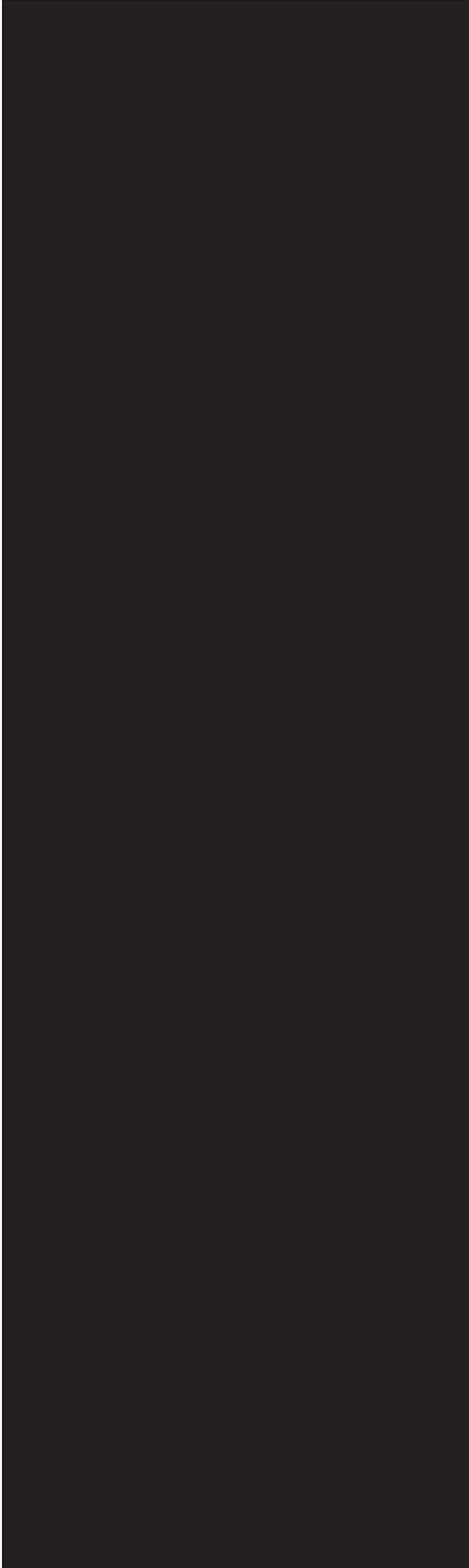
RESPONSE

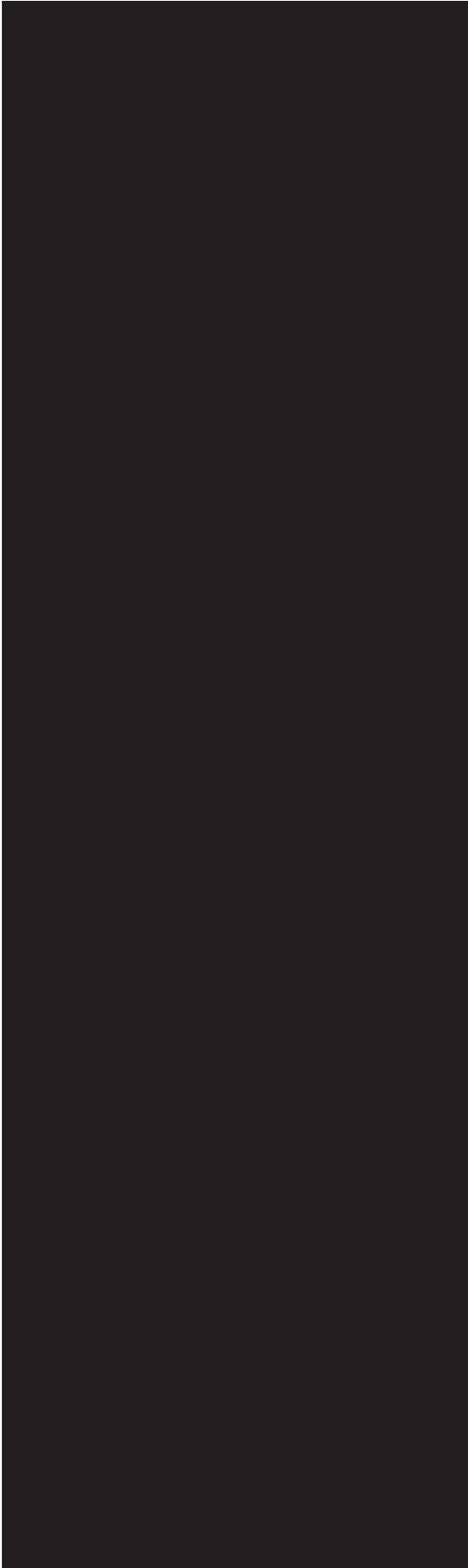
The markets in which Harron advertised or marketed Dedicated Service as of December 31, 2013 follow. **[BEGIN HIGHLY CONFIDENTIAL]**













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[END HIGHLY CONFIDENTIAL]

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Harron Communications, L.P., FRN: 0016642761

Question II.A.18: Comparison of Terms and Conditions with ILEC Offerings

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

[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]

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Harron Communications, L.P., FRN: 0016642761

Question II.A.19: Business Justification for Term or Volume Commitments

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*.

RESPONSE

[BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL]

Harron Communications, L.P., FRN: 0016642761

Question II.C.1: Best Efforts Broadband Business Internet Access Questions

If you provide *Best Efforts Business Broadband Internet Access Services* to 15,000 or more customers or 1,500 or more business broadband customers in areas where the *ILEC* is subject to price cap regulation, then answer the following questions:

- a. Did you submit data in connection with the State Broadband Initiative (SBI) Grant Program for 2013?

RESPONSE

[BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL]

- b. Did the data you submitted in connection with the SBI Grant Program in 2013 accurately and completely identify the areas in which you offered *Best Efforts Business Broadband Internet Access Services* and exclude those areas where you did not offer such services as of December 31, 2013?

RESPONSE

[BEGIN HIGHLY CONFIDENTIAL] [REDACTED]



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[END HIGHLY CONFIDENTIAL]

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Harron Communications, L.P., FRN: 0016642761

Question II.D.2: Location of Recorded Policies

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

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]