



February 24, 2015
Via ECFS

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

**RE: Cooperative Communications, Inc.
FRN 0003747409
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 Cooperative Communications, Inc. 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 407-740-3031 or via email to stthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas

Consultant to Cooperative Communications, Inc.

cc: Karen McDine - Cooperative
file: Cooperative - FCC - Other
tms: FCx1502

ST/im

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/Louis Lombardi, Jr.

Printed Name Louis Lombardi, Jr.

Title: Chief Operating Officer

Date: February 24, 2015

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Cooperative Communications, Inc.
Question II.A.5. Part 1

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: Cooperative has no fiber routes.

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Response of Cooperative Communications, Inc.
Question II.A.5. Part 2

Question: Identify locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response: Not Applicable.

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Response of Cooperative Communications, Inc
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.

a: 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: Cooperative provides services to small/medium-sized End Users, primarily in New Jersey. Building a connection would be expensive as compared to leasing the requirements from our suppliers.

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

Response: Cooperative sells to primarily small/medium-sized business Customers. Wire centers, with a high percentage of businesses, are our focus for directing our sales efforts.

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: Cooperative has been successful in providing services to small/medium-sized businesses in North Jersey. Our connections are leased from the ILECs and other suppliers at very competitive rates, thus allowing Cooperative to sell at competitive rates to our Customers.

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Response of Cooperative Communications, Inc.
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: Cooperative does not advertise/market Dedicated Services. Cooperative sells Dedicated Services as part of an overall solution to an End User's communications needs.

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Response of Cooperative Communications, Inc.
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: Cooperative provides term commitments that vary by the length of the contract. There is also a termination liability that is applied should a Customer disconnect the service prior to term's end. They are very similar to the ILEC.

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Response of Cooperative Communications, Inc.
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.

Response: Cooperative purchases its services from ILECs and other suppliers. Our term commitments are structured for our Customers similar to what Cooperative would incur from its suppliers

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Response of Cooperative Communications, Inc.
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.

Response: Cooperative does not promote or advertise our services. Cooperative has a telemarketing department and inside sales group that reaches out to new or existing Customers. Our strategy is to target small/medium-sized businesses and provide an overall telecommunications solution; not specifically Dedicated Services.

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Response of Cooperative Communications, Inc.
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: Cooperative provides Dedicated Services on an individual-case basis, as found in our Interstate Tariff, Section 4. Cooperative negotiates separate agreements with Customers. These agreements are provided in writing to both the Customer and Cooperative. The agreements are not public documents.