



February 25, 2015
Via ECFS

**REDACTED –
FOR PUBLIC INSPECTION**

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

**RE: LMK Communications, LLC
FRN 0005051891
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 LMK Communications, LLC (“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 407-740-3031 or via email to stthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant to LMK Communications, LLC

cc: Jennifer M. Halsing, LMK
file: LMK - FCC
tms: FCx1501

ST/bc

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/ Jennifer M. Halsing

Printed Name: Jennifer M. Halsing

Title: Assistant Secretary & Assistant Treasurer

Date: February 25, 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 LMK Communications, LLC
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:



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**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of LMK Communications, LLC
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:



Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of LMK Communications, LLC
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: LMK Communications builds fiber to Locations based on the total demand anticipated within the near term, and based on the total capital cost to build fiber and deploy fiber equipment as compared with the alternative cost to lease capacity or fiber, with consideration as to the term commitment available for both sold and leased circuits. Local, environmental, municipal, topographical and right-of-way availability conflicts limit our decisions to build fiber. In areas where alternative fiber providers offer fiber or bandwidth services, LMK leases capacity rather than building new fiber.

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

Response: Business Density is generally not a decision factor in building to specific locations.

- 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 kinds of regions, indicate what distinguishes these different regions.

Response: LMK Communications has been most successful in building connections where suitable alternative or diverse connections do not exist and where Customers desire significant dedicated bandwidth. LMK Communication is also successful in areas where multiple carriers not only exist, but provide interconnections between their networks. LMK Communications is generally not successful where a single provider has significant fiber resources, but does not allow or promote connecting those resources with other providers.



Eastern, NC Network



About Us

- LMK Communications, LLC Founded in 2001
 - North Carolina LLC, owned 100% by Clarity Communications Group Inc.
 - CLEC (Competitive Local Exchange Carrier)
 - IXC (Interexchange Carrier)

- Services Provided
 - Private Line (Ethernet, SONET)
 - Direct Internet Access
 - Collocation

- Customers
 - Long Distance Carriers
 - State and Local Governments
 - Wireless Service Providers
 - Internet Service Providers
 - Federal Government
 - Large Enterprises



The Network and Services

- 40 Channel DWDM Network
 - 10G equipped and 100G capable channels
 - Diverse Path Fiber Backbone

- Ethernet Transport
 - 10/100Mb, 1G, 10G, 100G

- SONET Private Line
 - DS1, DS3, OC3, OC12, OC48, OC192

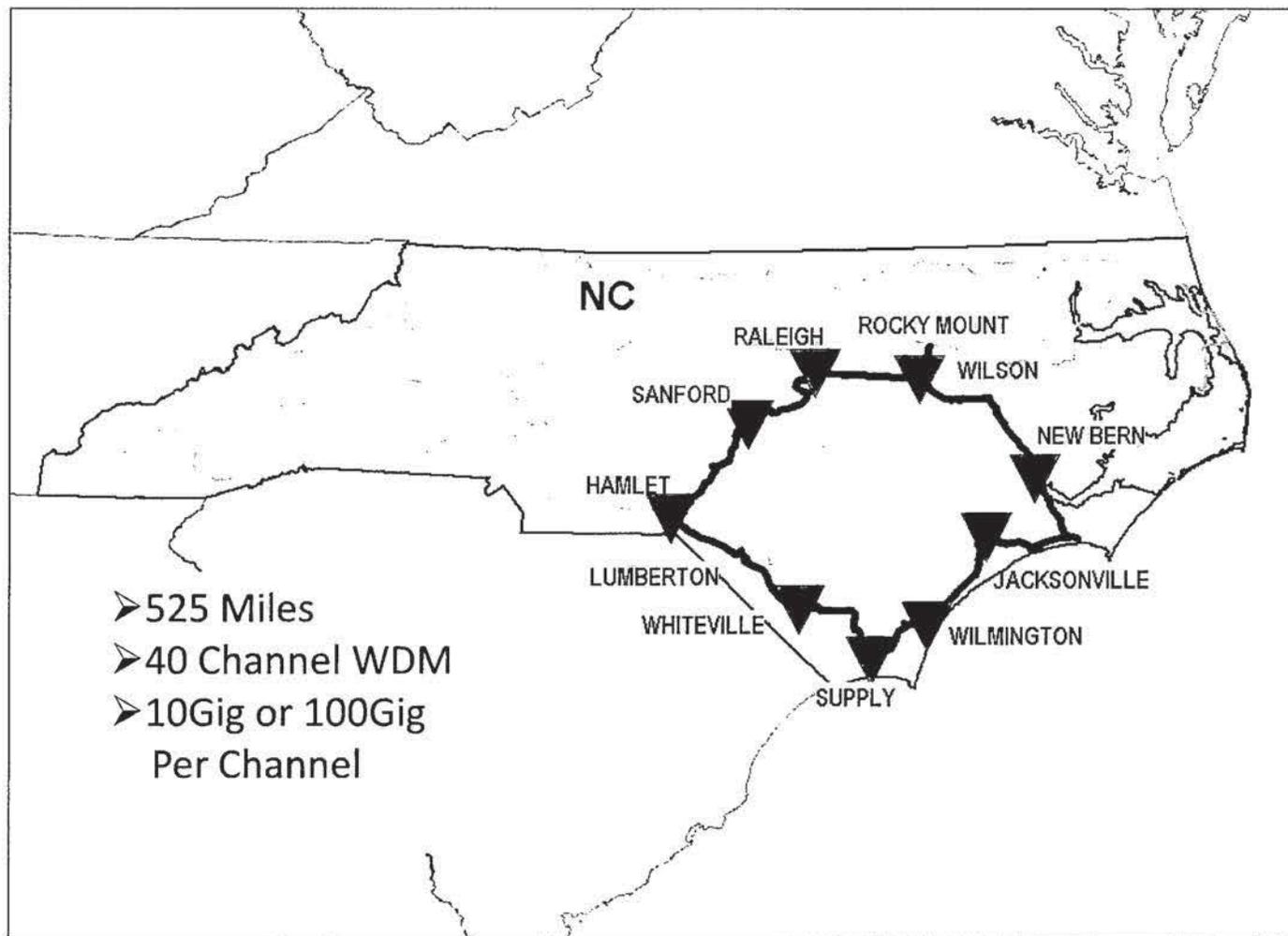
- Wavelength Transport
 - 1G, 2.5G, 10G, 100G

- Dedicated Internet Access
 - 1G, 10G Ports with scalable bandwidth solutions
 - Diverse Upstream Core

- Colocation Facilities
 - Greensboro, NC and Raleigh, NC



The Network



Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of LMK Communications, LLC
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:

None of the dedicated services we offer contain either a Prior Purchase-Based Commitment or a Non-Rate Benefit.

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of LMK Communications, LLC
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:

We offer discounts for term commitments to encourage longer termed circuits.

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of LMK Communications, LLC
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: LMK Communications promotes its services through a direct sales force specifically targeting customers within the localities that we serve. We use telephone and direct email solicitation to initiate a consultative sales approach where services are tailored to meet specific customer needs and often result in individual case basis contract terms and pricing. We target companies which have in-house data centers, have multiple locations, or which have high bandwidth needs resulting from data-intensive products or business plans. We serve customers with locations in the Southeastern United States, primarily in North and South Carolina and adjacent areas. Typical customers have private wide-area networks with a need for redundancy, privacy, resiliency or low latency connections.

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of LMK Communications, LLC
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: LMK's policies for initiation of service, service upgrades and service disconnections are conveyed to customers in writing as part of the terms & conditions of our service agreements.