REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

February 26, 2015

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

ATTENTION: WIRELINE COMPETITION BUREAU

RE: Redacted Confidential and Redacted Highly Confidential Special Access Data Collection Forms
FRN 0002645497, MN, Benton Cooperative Telephone Company
WC Docket 05-25 and RM - 10593

Dear Ms. Dortch:

Pursuant to Commission's Special Access Data Collection requirements in WC Docket 05-25 and RM-10593, Benton Cooperative Telephone Company, MN, FRN 0002645497 is filing Redacted Copies of its Stamped Confidential and Stamped Highly Confidential Special Access Data Collection Documents[1].

Please address any correspondence regarding this transmittal to the attention of Tom Campbell at the following address, e-mail or telephone number.

Sincerely,

Tom Campbell
Telecommunications Consultant
tcampbell@otcpas.com
651-621-8511 (v)
651-483-2467 (f)

Enclosures

[1] See Order and Data Collection Protective Order WC Docket No. 05-525 and RM 10593, Adopted October 1, 2014, Released October 1, 2014.

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FRN: 0002645497

Company: Benton Cooperative Telephone Company

EXPLANATORY ATTACHMENT

Response:

[Begin Confidential Information]

[redacted]

[redacted]

[End Confidential Information]

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FRN: 0002645497

Company: Benton Cooperative Telephone Company

Question: II.A.5

[The response to II.A.5 is specially-formatted electronic files containing exclusively highly confidential information, this includes a Fiber Network Map shapefile submitted as a WinZip archive and Node Information submitted as a .csv delimited text file. A redacted version of such files would be empty and therefore, the company is filing this document as the public version of such the noted files.]

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FRN: 0002645497

Company: Benton Cooperative Telephone Company

Question: II.A.8

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.

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

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 Information]

a.

[redacted]

b.

[redacted]

c.

[redacted]

[End Highly Confidential Information]

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FRN: 0002645497

Company: Benton Cooperative Telephone Company

Question: II.A.10

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:

[Begin Highly Confidential Information]

[redacted]

[End Highly Confidential Information]

FRN: 0002645497

Company: Benton Cooperative Telephone Company

Question: II.A.11
Part 2.

Identify the business rules relied upon to determine whether to submit a bid in response to an RFP

Response:

Not Applicable

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Company: Benton Cooperative Telephone Company

Question: II.A.18

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 Information]

[redacted]

[End Confidential Information]

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Company: Benton Cooperative Telephone Company

Question: II.A.19

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 Information]

[redacted]

[End Highly Confidential Information]

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Question: II.D.1

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:

[Begin Confidential Information]

[redacted]

[End Confidential Information]

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Question: II.D.2

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 Information]

[redacted]

[End Confidential Information]