ITCI Interstate Telcom Consulting, Inc.
Independent Telecommunications Consultants

REDACTED – FOR PUBLIC INSPECTION

February 26, 2015

Via ECFS

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

Re: WC Docket No. 05-25
RM-10593
Special Access Data Collection
Tech-Com, Inc. FRN 0003775749

Dear Ms. Dortch:

On behalf of Tech-Com, Inc., Interstate Telcom Consulting, Inc. hereby files redacted responses to the data collection pursuant to the Data Collection Protective Order in the above proceeding.[1] Confidential and Highly Confidential documents have been submitted in the Special Access Web Portal.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

Roxanne K. Hacker
Regulatory Consultant
320-848-6641
roxih@interstatetelcom.com

[1] *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, DA 14-1424 (rel. October 1, 2014).

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Question II.A.5: Map
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Question II.A.5.

Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including 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.

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Question II.A.8: Business Rules for Deployment
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Question II.A.8.

Explain your business rule(s) used to determine whether to build a *Connection* to a particular *Location*. Provide underlying assumptions.

- 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.

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Question II.A.8.b.

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

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Question II.A.8c.

- 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.

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Question II.A.10: Marketing
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Question II.A.10.

Provide data, 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.

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Question II.A.11: RFPs
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Question II.A.11. Part 2.

Identify the five most recent Requests for Proposals (RFPs) for which you were selected as the winning bidder to provide each of the following: (a) *Dedicated Services;* (b) *Best Efforts Business Broadband Internet Access Services;* and, to the extent different from (a) or (b), (c) some other form of high-capacity data services to business customers.

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Question II.A.18: Prior Purchased-Based
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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*.

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Question II.A.19: Term/Volume
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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*.

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Question II.C.1
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Question II.C.1

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:

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

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If you answered "no" to questions II.C.1.a, then you do not need to answer any further questions in this section.

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?

REDACTED

If yes, then provide the list of prices for those *Best Efforts Business Broadband Internet Access Services th*at you were marketing in each census block submitted in connection with the SBI Grant Program as of December 31, 2013. If there is a price variation within your service footprint, indicate which prices are associated with which census blocks.

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i. If no, then provide a list of all the census blocks in which you offered *Best Efforts Business Broadband Internet Access Services* as of December 31, 2013, and a list of the prices for those *Best Efforts Business Broadband Internet Access Services* that you were marketing in each census block as of December 31, 2013. If there is a price variation within your service footprint, indicate which prices are associated with which census blocks.

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Question II.D.1: Promotional Strategy
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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.

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Question II.D.2: Service Policies
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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.

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Explanatory Attachment
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