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Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
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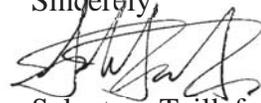
RE: Special Access Data Collection
Protective Order in WC Docket No. 05-25
RM-10593

Dear Ms. Dortch:

Custer Telephone Broadband Services, LLC (“CTBS”), by its attorney, hereby submits the redacted versions of its essay responses to the Special Access Data Collection in the above-referenced proceeding. Pursuant to the Protective Order,¹ CTBS has submitted Confidential and Highly Confidential versions of the same through the FCC’s Special Access Web Portal.

If you have any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,



Salvatore Taillefer, Jr.

*Counsel to Custer Telephone
Broadband Service, LLC*

¹ *In the Matter of 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. Oct. 1, 2014).

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 THE FIBER CONNECTIONS TO LOCATIONS. IN ADDITION, INCLUDE THE LOCATIONS OF ALL NODES USED TO INTERCONNECT WITH THIRD PARTY NETWORKS, AND THE YEAR EACH NODE WENT LIVE.

[REDACTED IN FULL]

II.A.8: EXPLAIN YOUR BUSINESS RULES USED TO DETERMINE WHETHER YOU 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.*

[REDACTED IN FULL]

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

[REDACTED IN FULL]

- c. *In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were able to successfully deploy connections, and where you generally have experienced or currently experience serious difficulties deploying connections, and, if you are able to provide examples of both kinds of regions, indicate what distinguishes these different regions.*

[REDACTED IN FULL]

II.A.10: PROVIDE DATA, MAPS, INFORMATION, MARKETING MATERIALS, AND OR/DOCUMENTS IDENTIFYING THOSE GEOGRAPHIC AREAS WHERE YOU, OR AN AFFILIATED COMPANY, ADVERTISED AND MARKETED DEDICATED SERVICES 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.

[REDACTED IN FULL]

II.A.11: 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. (THE FOLLOWING REMAINING PARTS OF THIS QUESTION ARE OPTIONAL.) IN ADDITION, IDENTIFY THE FIVE LARGEST RFPs (BY NUMBER OF CONNECTIONS) FOR WHICH YOU SUBMITTED AN UNSUCCESSFUL COMPETITIVE BID IN 2013 FOR EACH OF (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. FOR EACH RFP IDENTIFIED, PROVIDE A DESCRIPTION OF THE RFP, THE AREA COVERED, THE PRICE OFFERED, AND OTHER COMPETITIVELY RELEVANT INFORMATION. LASTLY, IDENTIFY THE BUSINESS RULES YOU RELY UPON TO DETERMINE WHETHER TO SUBMIT A BID IN RESPONSE TO AN RFP.

[REDACTED IN FULL]

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.

[REDACTED IN FULL]

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.

[REDACTED IN FULL]

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.

[REDACTED IN FULL]

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.

[REDACTED IN FULL]