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REDACTED – FOR PUBLIC INSPECTION

February 27, 2015

Via ECFS

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

**Re: WC Docket No. 05-25
RM-10593
Special Access Data Collection
NKTelco – FRN: 0008612111**

Dear Ms. Dortch:

On behalf of NKTelco this filing provides redacted responses to the data collection pursuant to the Data Collection Protective Order in the above proceeding. The complete filing including Confidential and Highly Confidential documents have been submitted via the Special Access Web Portal.

Questions may be referred to me at 770-649-1886.

Sincerely,

A handwritten signature in cursive script that reads "Eileen M Bodamer".

Eileen M Bodamer

Enc.

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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 that each *Node* went live.

This response including map and node data is redacted in its entirety.

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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.

[REDACTED]

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

[REDACTED]

- 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.

[REDACTED]

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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.



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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.

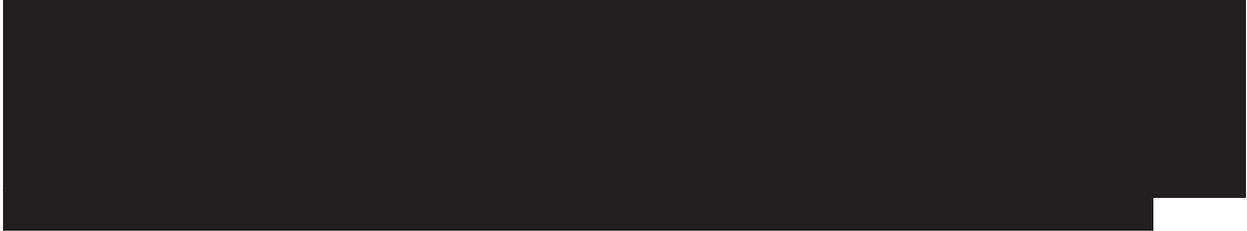


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II.A.18. If you offer *Dedicated Services* pursuant to an agreement or *Tariff* that contains either a *Prior Purchase-Based Commitment* or a *Non-Rate Benefit*, then explain how, if at all, those sales are distinguishable from similarly structured *ILEC* sales of *DS1s*, *DS3s*, and/or *PBDS*.



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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]

[REDACTED]

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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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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.

NKTelco operates as a non-tariffed service provider for *Dedicated Services*. Its services are provided over its own facilities and accordingly the process for initiation of service and service upgrades are handled on an individual case basis after consulting with the customer. Disconnection policies are pursuant to arrangements established with the customer at the time of service ordering.

These policies are not publically available. *Dedicated Service* customers receive this information through a combination of written communications, including email on occasion, as well as verbally at the time of sale and as part of the normal account management process.