



February 27, 2015

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**Re: WC Docket No. 05-25  
CP-TEL Network Services, Inc. Request for an Extension of Time**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §1.3 of the Commission's rules, CP-TEL Network Services, Inc. (the "Company" or "CP-TEL") hereby requests a waiver of the February 27, 2015 deadline for the submission of the "Provider" portion of the Special Access Data Collection (the "data request").<sup>1</sup> For the reasons stated herein, the Company respectfully requests that it be granted until March 27, 2015 to complete the applicable portions of the Commission's data request. In this regard, and based on its review of the data request instructions, the Company falls under the "Small Entity Compliance" category and must submit data pertaining to the Provider portion of the data request. CP-TEL is under the threshold for the Purchasers of Special Access and the Best Efforts Business Broadband Internet Access Services provisions of the data collection, and as such does not need to respond.

CP-TEL provides telephone, internet, and video services in Natchitoches, Louisiana. The Company, on a limited basis, also serves the City of Mansfield and the Town of Many, which are also in Louisiana. Overall, the Company serves approximately 1,500 customers. Along with the undersigned, CP-TEL uses two additional individuals not only for all accounting functions of the Company (billing, payroll, accounts payable, inventory, etc.) but also to address all regulatory matters. The Company has been engaged in a planned internal corporate accounting program deployment that overlapped the period of time in which the data request responses were to be developed. In addition, one of CP-TEL's accounting staff members was out on maternity/family leave starting the last week in November and did return to full time status until February 10, 2015.

Regrettably, due to the staff shortage and commitments, the Company's efforts to address the data collection filing were delayed. Once the process began to assimilate the data, the Company realized it did not have the internal resources or expertise to submit data in compliance with the directives of certain areas of the web portal. Specifically, these sections are section

<sup>1</sup> See *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, Order*, WC Docket No. 05-25, RM-10593, DA 14-1706, released November 26, 2014.

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**CP-TEL NETWORK SERVICES, INC.**

5909 Hwy. 1 Bypass  
P.O. Box 777 • Natchitoches, LA 71457  
318.352.0006 1.888.357.0089 Fax 318.352.0104  
support@cp-tel.net



Marlene H. Dortch  
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Page 2

II.A.5 Fiber Network Maps shapefile format and the Oracle Database setup to enable the input of the data. Submission of this data will require the hiring of an outside consulting firm which is underway. Based on current expectations, the Company believes that the necessary effort can be completed and the Company's response submitted in full by March 27, 2015.

The Company regrets that it will be unable to meet the February 27, 2015 deadline. The Company respectfully submits that the extension of time is required based on the specific circumstances that it faces. While the Company is not certain what, if any, negative impact the requested four week delay in the Company providing its responses will have on the Commission's overall assimilation of the special access data submission of all carriers, CP-TEL trusts that its small size will mitigate any impact. As such, the Company respectfully requests that it be granted until March 27, 2015 to complete the Provider portion of the data request.

Should you have any questions, please contact the undersigned.

Respectfully submitted,

Tom Edens  
Chief Financial Officer

cc: Christopher Koves  
Pricing Policy Division  
Wireline Competition Bureau

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