



Your business  
is our business.

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED – FOR PUBLIC INSPECTION

February 27, 2015

**Via ECFS**

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

**Re: WC Docket No. 05-25  
RM-10593  
Special Access Data Collection  
Shenandoah Telecommunications Company 0002064145**

Dear Ms. Dortch:

On behalf of Shendoah Telecommunications Company, JSI hereby files redacted responses to the data collection pursuant to the Data Collection Protective Order in the above proceeding.<sup>1</sup> 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,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

---

<sup>1</sup> *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).*

**Question II.A.5: Map  
Special Access Data Request  
Shenandoah Telecommunications Company 0002064145**

**Section 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.**

**REDACTED**

**Question II.A.5: Nodes**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**Section 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.**

REDACTED

REDACTED FOR PUBLIC INSPECTION

**Question II.A.8: Business Rules for Deployment  
Special Access Data Request  
Shenandoah Telecommunications Company 0002064145**

**Section II.A.8: Explain your business rules used to determine whether you build a connection to a particular location. Provide underlying assumptions.**

**REDACTED**

**Section II.A.8.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**

**Section II.A.8.b: Explain how, if at all, business density is incorporated into your business rules, and if so, how to measure business density.**

**REDACTED**

**Section II.A.8.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**

REDACTED FOR PUBLIC INSPECTION

**Question II.A.10: Marketing  
Special Access Data Request  
Shenandoah Telecommunications Company 0002064145**

**Section 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

REDACTED FOR PUBLIC INSPECTION

**Question II.A.11: RFPs  
Special Access Data Request  
Shenandoah Telecommunications Company 0002064145**

**Section II.A.11: ONLY REQUIRED IF RESPONDENT IS A WINNING BIDDER ON AN RFP; INFORMATION ON UNSUCCESSFUL BIDS IS VOLUNTARY.**

REDACTED

REDACTED FOR PUBLIC INSPECTION

**Question II.A.18: PRIOR PURCHASE-BASED  
COMMITMENT or NON-RATE BENEFIT  
Special Access Data Request  
Shenandoah Telecommunications Company 0002064145**

**Section 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**

REDACTED FOR PUBLIC INSPECTION

**Question II.A.19: TERM/VOLUME**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**Section 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**

**Question II.C.1: Best Efforts Broadband  
Special Access Data Request  
Shenandoah Telecommunications Company 0002064145**

**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:**

**RESPONSE AND ATTACHMENTS REDACTED IN ENTIRETY**

**Question II.D.1: PROMOTIONAL STRATEGY**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**Section 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**

**Question II.D.2: SERVICE POLICIES**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**Section 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**

**Question II.E 9: OPTIONAL**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**(Optional)** Explain whether the terms and conditions of any *Tariff* or contract to which you are a party for the purchase of *Dedicated Services* or the policies of any of your *Providers* constrain your ability to:

- a. Decrease your purchases from your current *Provider(s)*;
- b. Purchase services from another *Provider* currently operating in the geographic areas in which you purchase services;
- c. Purchase non-tariffed services, such as Ethernet services, from your current *Provider* of tariffed *DS1*, *DS3*, and/or *PBDS* services or from other *Providers* operating in the geographic areas in which you purchase tariffed services;
- d. Contract with *Providers* that are considering entering the geographic areas in which you purchase tariffed services;
- e. Move circuits, for example, moving your *DS1* and/or *DS3 End-User Channel Terminations* to connect to another *Transport Provider*; or
- f. Otherwise obtain *Dedicated Services* or change *Providers*.

Relevant terms and conditions, among others, may include: (a) early termination penalties; (b) shortfall provisions; (c) overlapping/supplemental discounts plans with different termination dates; (d) requirements to include all services, including new facilities, under a *Tariff Plan* or *Contract-Based Tariff*; or (e) requiring purchases in multiple geographic areas to obtain maximum discounts.

In your answer, highlight contracts where you contend that a term or condition is a particularly onerous constraint by comparison with more typical provisions in other contracts. Also, at a minimum, list: (a) the *Provider* and indicate whether the *Provider* is an *ILEC* or a *Competitive Provider*; (b) a description of the term or condition; (c) the geographic area in which the services are provided; (d) the name of the vendor providing the service; and (e) where relevant, the specific *Tariff* number(s) and section(s), or if the policy at issue is recorded in documents other than *Tariffs*, list those documents and how you obtained them.

If you allege that a term, condition, or *Provider's* policy negatively affects your ability to obtain *Dedicated Services*, state whether you have brought a complaint to the Commission, a state commission or court about this issue and the outcome. If you have not brought a complaint, explain why not.

**REDACTED**

**Question II.E 10: OPTIONAL**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**(Optional)** If you purchase, or purchased, *Transport Service* and *End User Channel Terminations* from the same *Provider*, explain your experience with changing *Transport Service* from one *Provider* to another between January 1 and December 31, 2013 while keeping your *End User Channel Terminations* with the original *Provider*. Where appropriate, identify the *Provider(s)* in your responses below and indicate whether they are an *ILEC* or a *Competitive Provider*.

- a. How many times did you change *Transport Service* while keeping your *End User Channel Terminations* with the original *Provider*? An estimate of the number of circuits moved to a new *Transport Provider*, or the number of such changes requested, is sufficient.
- b. What was the length of time, on average, it took for the original *Provider* to complete the process of connecting your last-mile *End-user Channel Terminations* to another *Transport Provider*? An estimate is sufficient.
- c. Were you given the opportunity to negotiate the amount of time it would take to complete the process of connecting your *End User Channel Terminations* to another *Transport Provider* on a case-by-case basis? In answering this question, also describe and provide citations to the *ILEC's* or *Competitive Provider's* policies, rules or, where relevant, *Tariff* provisions, if known, explaining the transition process.
- d. How did connecting to a new *Transport Provider* impact the rate you paid for the *End User Channel Terminations* you continued to purchase from the original *Provider*?
- e. Did connecting to a new *Transport Provider* typically impact the rate you continued to pay for *Transport Service* from the original *Provider* while the change in *Transport Providers* remained pending? If so, how? What was the average percentage change in rates? For example, did you ever pay a *One Month Term Only Rate* during that time?

**REDACTED**

**Question II.E 11: OPTIONAL**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**(Optional)** Describe any circumstances since January 1, 2013, in which you have purchased circuits pursuant to a *Tariff*, solely for the purpose of meeting a *Prior Purchase-Based Commitment* required for a discount or *Non-Rate Benefit* from your *Provider* (i.e., you would not have purchased the circuit but for the requirement that you meet a *Volume Commitment* required for a discount or *Non-Rate Benefit* from your *Provider*). In your description, provide at least one example, which at a minimum, lists:

- a. The name of the *Provider* providing the circuits at issue;
- b. A description of the *Prior Purchase-Based Commitment*;
- c. The *Tariff* and section number(s) of the specific terms and conditions described;
- d. The number of circuits you would not have purchased but for the *Prior Purchase-Based Commitment* requirement to receive a discount or *Non-Rate Benefit*;
  - i. Of the circuits reported in II.E.11.d, how many did you not use at all?
- e. A comparison of the dollar amount of the unnecessary circuit(s) purchased versus the dollar amount of penalties your company would have had to pay under the *Prior Purchase-Based Commitment* had it not purchased and/or maintained the circuit(s), and a description of how that comparison was calculated.
- f. How many circuits were activated under the identified *Tariff* plan and not used when you initially entered into the plan? What were these unused circuits as a percent of the total circuits currently purchased under this *Tariff* plan? Indicate the percent of the total circuits currently purchased under this *Tariff* plan that exceed your *Prior Purchase-Based Commitment*.
- g. For the *Prior Purchase-Based Commitment*, indicate whether you are able to buy any *DS1s* or *DS3s* from the *Provider* outside of the identified *Tariff* plan, or are you required to make all purchases from the *Provider* pursuant to the identified *Tariff* plan?

**REDACTED**

**Question II.E.12: Switching Providers**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**II.E.12. For each year for the past five years, state the number of times and in what geographic area(s) you have switched from one Provider of Dedicated Services to another.**

**REDACTED**

**Question II.E 13: OPTIONAL**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

**(Optional)** Explain the circumstances since January 1, 2013 under which you have paid *One Month Term Only Rates* for *DS1*, *DS3*, and/or *PBDS* services and the impact, if any, it had on your business and your customers. In your response, indicate any general rules you follow, if any, concerning the maximum number of circuits and maximum amount of time you will pay *One Month Term Only Rates*, and your business rationale for any such rules.

**REDACTED**

REDACTED FOR PUBLIC INSPECTION

**Explanatory Attachment**  
**Special Access Data Request**  
**Shenandoah Telecommunications Company 0002064145**

REDACTED