Your business
is our business.

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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
ComSouth Telenet, Inc. - 0010112571

Dear Ms. Dortch:

On behalf of **ComSouth Telenet, Inc. - 0010112571,** JSI 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,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.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. Oct. 1, 2014).

Question II.A.5: Fiber Map
Special Access Data Collection
ComSouth Telenet, Inc. - 0010112571

Question II.A.5: Fiber Network Map - Fiber Map. Competitive Providers, not including cable companies operating within their local franchise areas (LFAs), must provide a map of the fiber routes that constitute their network. Include those fiber "spans" (i.e., lengths of fiber with terminating equipment on both ends) within your network that you (i) own or (ii) lease pursuant an IRU agreement. The map must show the fiber routes that constitute your network, including the "middle-mile" transport fiber network and any fiber routes to Locations. For Competitive Providers that are cable companies operating within their LFAs, provide a map of the fiber routes constituting your "middle mile" interoffice transport network. Include those fiber "spans" (i.e., lengths of fiber with terminating equipment on both ends) within your network that you (i) own or (ii) lease pursuant an IRU agreement. The map need not show the "last mile" fiber routes to Locations, i.e.,
the feeder links.

Map redacted in entirety.

Question II.A.5: Nodes
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Nodes. Competitive Providers, not including cable companies operating within their LFAs, identify all Nodes on your network that are points of interconnection with the networks of other Providers and indicate the year that the Node was first used for interconnecting with another Provider. In lieu of identifying Nodes used for interconnection, you can submit to the Commission the interconnection data on file with the Central Location Online Entry System (CLONES) database for your operations. The certification submitted in connection with your submission will attest that the CLONES data are current and accurately depict your network interconnection points and the "live" dates to the best of your knowledge. For Competitive Providers that are cable companies operating within their LFAs, indicate only those Nodes that are headends that have been upgraded to provide a Metro Ethernet (or its equivalent) service and the year the upgrade was completed.

Node table redacted in its entirety.

Question II.A.8: Business Rules for Deployment
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Section II.A.8: Explain your business rules used to determine whether you build a connection to a particular location. Provide underlying assumptions.

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]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [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]

Question II.A.10: Marketing
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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]

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

[redacted]

Question II.A.18: PRIOR PURCHASE-BASED COMMITMENT or NON-RATE BENEFIT
Special Access Data Request
ComSouth Telenet, Inc. - 0010112571

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]

Question II.A.19: TERM/VOLUME
Special Access Data Request
ComSouth Telenet, Inc. - 0010112571

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.D.1: PROMOTIONAL STRATEGY
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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
ComSouth Telenet, Inc. - 0010112571

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]