

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**WASHINGTON HARBOUR, SUITE 400**

**3050 K STREET, NW**

**WASHINGTON, D.C. 20007-5108**

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

THOMAS W. COHEN

DIRECT LINE: (202) 342-8518

EMAIL: thcohen@kelleydrye.com

NEW YORK, NY

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

February 27, 2015

**REDACTED-FOR PUBLIC INSPECTION**

**VIA ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Special Access Data Collection, WC Docket No. 05-25, RM-10593

Dear Secretary Dortch:

In response to the Federal Communications Commission's Special Access Data Collection, Tele-Media Company of Zion, LLC ("Tele-Media"), hereby submits its essay responses suitable for public inspection, including redacted versions of its confidential and highly confidential information. Pursuant to the Protective Order adopted in this proceeding<sup>1</sup>, all pages of this filing are marked "REDACTED-FOR PUBLIC INSPECTION."

Versions of the essay responses containing Confidential and Highly Confidential information as defined by the Protective Order and the data container containing Highly Confidential information as defined by the Protective Order have been submitted via the Commission's Special Access Web Portal.

---

<sup>1</sup> *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corp. Petition for Rulemaking to Reform Regulations of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) ("Protective Order.")*.

**REDACTED-FOR PUBLIC INSPECTION**

Page Two

Any questions relating to the enclosed materials may be directed to Robert D Stemler of Tele-Media at (814) 353-2013 or to the undersigned.

Respectfully submitted,

A handwritten signature in blue ink that reads "Thomas Cohen". The signature is written in a cursive style with a long horizontal stroke at the end.

Thomas Cohen

cc: Robert D Stemler

Enclosure

**FOR PUBLIC INSPECTION**

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.
- b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.
- 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 kind of regions, indicate what distinguishes these different regions.

**Response:**

[BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED] [END

CONFIDENTIAL]

TMC Zion provides no other dedicated connections nor does it have any intent in doing so.

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.

**Response:**

TMC Zion has not advertised or marketed Dedicated Service as of December 31, 2013 and does not have any plans to do so within 24 months of that time.

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.

**Response:**

TMC Zion has never responded to any RFPs for dedicated access.

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question II.A.11 Part 2:**

**Response:**

TMC Zion has never responded to any RFPs for dedicated access and, accordingly, the response is "Not Applicable".

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.

**Response:**

Not Applicable.

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.

**Response:**

Not Applicable.

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.

**Response:**

Not Applicable as TMC Zion is currently not expanding nor does it intend to pursue expanding Dedicated Services in our Local Franchise Area.

**FOR PUBLIC INSPECTION**

**Tele-Media Company of Zion, LLC; 0005-0414-62**

**Question 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.

**Response:**

[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]