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February 27, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-5-A325
Washington, DC 20554

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

Dear Secretary Dortch,

On behalf of UPN Holdings, LLC ("UPN"), FRN 0020177036, and the Subsidiaries identified in its February 27, 2015 holding company letter, enclosed for filing, in accordance with the Order and Data Collection Protective Order¹, are the non-confidential version of responses to essay questions as part of the special access mandatory data collection. The Highly Confidential version of the essay responses and the Highly Confidential data container have been submitted via the Commission's Special Access Web Portal.

Please direct any questions to Ronda Plummer of Unite Private Networks at (816) 425-3566, or to the undersigned.

Sincerely,

/s/ Tamar E. Finn

Tamar E. Finn
Counsel to UPN Holdings, LLC

cc: Ronda Plummer

¹ 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 Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593, Order and Data Collection Protective Order, Appendix A, para.3, DA 14-1424, (rel. Oct. 1, 2014).

UPN Holdings, LLC (Holding Company)

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 Services over existing facilities, vial 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.

ANSWER:

See attached Network Map and Company Overview.

NETWORK MAP



OUR NETWORK
Serving 255+ communities
Across 20 states
5,000 metro fiber route miles
2,500 on-net buildings

Providing customized network solutions since 1998

Unite Private Networks can offer a complete turn-key solution to ensure that your network has the scale and bandwidth it needs while staying within your budget. Expanding your network quickly to allow for fast scalability - our solutions serve to grow your business. Our markets include:

- Dallas, TX
- Lincoln, NE
- Omaha, NE
- Kansas City, MO
- Pueblo, CO
- Denver, CO
- Iowa
- Chicago, IL
- Little Rock, AR

Services:

Ethernet 10 Mbps - 100 Gbps • Dark Fiber
Customized Networks • Scalable Wavelengths
Fiber to the Cell • Greenfield Construction

Contact us for for lit building information and detailed fiber maps.

Unite Private Networks
1201 South Stewart Road
Lincoln, NE 68508
913.332.9444
www.uniteprivatenetworks.com



WHO ARE WE?

We are a telecommunications leader.

Unite Private Networks (UPN) provides high-bandwidth, fiber-based communications networks and services to schools, governments, carriers, data centers, hospitals, and enterprise business customers across a 20 state service area. Service offerings include dark and lit fiber, private line, metro-optical Ethernet, Internet access, data center services, and other customized solutions. We are headquartered in the Kansas City Metro area.

We serve over 255 cities across 20 states.

Our current network footprint reaches over 5,000 metro fiber route miles, and includes 2,500 on-net buildings. All are supported by a 24x7x365 NOC.

WHY CHOOSE US?

We are experienced.

We're a team that believes in the power of strategic design thinking, coupled with hands on execution. Multi-faceted in our experience, we bring a variety of skills and methods to every project we take on. We're practical, direct, creative, collaborative, and we love what we do.

We are metro fiber experts.

We are experts in integration of new technologies into existing networks. Our services include: Ethernet 10 Mbps to 100 Gbps, dark fiber, scalable wavelengths, customized networks, greenfield construction, and fiber to the cell.

Unite Private Networks
120 South Stewart Road
Liberty, MO 64068
816.903.9400
www.uniteprivatenetworks.com

UPN Holdings, LLC (Holding Company)

Question: II.A.18

How do your terms and conditions compare with ILEC offerings?

ANSWER:

UPN provides fiber-based data-only communications services to large organizations (businesses, governments, schools, other carriers) under long-term contracts. All services are provided under contracts that specify all terms and conditions. We don't offer services subject to Prior Purchase-Based Commitments or that contain Non-Rate Benefits.

UPN Holdings, LLC (Holding Company)

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 the type of customers your company targets or plans to target through these strategies.

ANSWER:

UPN provides high bandwidth, fiber-based communications networks and services to schools, governments, carriers, data centers, hospitals, and enterprise business customers across a 20 state service area. Service offerings include dark and lit fiber, Ethernet, Waves, Internet access, data center services, and other customized solutions. Headquartered in Kansas City, Missouri metropolitan area, UPN has been providing customer focused communications solutions since 1998.

UPN Holdings, LLC (Holding Company)

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; (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.

ANSWER:

All UPN customers are served under contracts that outline all terms of service. Copies of contracts are available upon request.