8517 Excelsior Drive
Suite 301
Madison, WI 53717

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
24-7 Telcom, Inc. FRN: 0002722049

Dear Ms. Dortch:

On behalf of **24-7 Telcom, Inc.**, Kiesling Associates 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,

KIESLING ASSOCIATES LLP

Robert R. Abrams

Robert R. Abrams
Senior Telecommunications Consultant
608/664-9110
rabrams@kiesling.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).

FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

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 (Fiber Map)

REDACTED (Nodes File)

FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

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.

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b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

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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 kinds of regions, indicate what distinguishes these different regions.

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FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

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 24 months of those dates.

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FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

II.A.11 Part 2. Identify the business rules relied upon to determine whether to submit a bid in response to an RFP.

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FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

II.A. 18. How do your terms and conditions compare with ILEC offerings?

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FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

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*.

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FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

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.

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FCC Special Access Data Collection
24-7 Telcom, Inc.
FRN: 0002722049

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 specific tariff section(s). If these policies are recorded in documents other than a tariff, 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.

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