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February 27, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Via ECFS

RE: TTM Operating Corporation, Inc.
FRN 0017049594
Special Access Data Collection
WC Docket No. 05-25, RM10593

Dear Ms. Dortch,

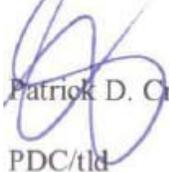
Attached please find the above captioned company's redacted – for public inspection version of the essay responses for the above referenced Special Access Data Collection Proceedings, in accordance with *Order and Data Collection Protection Order*, DA 14-1424, adopted October 1, 2014.

The Company's responses have also been submitted via the Special Access Web Portal.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER



Patrick D. Crocker
PDC/tld

**PUBLIC INFORMATION - SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of TTM Operating Corporation, Inc.
Question II.A.5.**

Question: 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.

Response: **REDACTED – FOR PUBLIC INSPECTION**

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Question II.A.8.**

Question: 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: **REDACTED – FOR PUBLIC INSPECTION**

Special Access Data Collection
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Response of TTM Operating Corporation, Inc.
Question II.A.10.

Question: 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:

REDACTED – FOR PUBLIC INSPECTION

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**Special Access Data Collection
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Response of TTM Operating Corporation, Inc.
Question II.A.11 Part 2**

Question: 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: **REDACTED – FOR PUBLIC INSPECTION**

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Question II.A.18.**

Question: 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: REDACTED – FOR PUBLIC INSPECTION

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Question II.A.19.**

Question: 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: **REDACTED – FOR PUBLIC INSPECTION**

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Question II.D.1.**

Question: 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: **REDACTED – FOR PUBLIC INSPECTION**

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Question II.D.2.**

Question: 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: **REDACTED – FOR PUBLIC INSPECTION**