Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

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
Ritter Communications, Inc. FRN 0007864895

Dear Ms. Dortch:

On behalf of **Ritter Communications, Inc. FRN 0007864895,** 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: Map
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

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

Question II.A.5: Nodes
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

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

Question II.A.8: Business Rules for Deployment
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

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

REDACTED

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

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

Question II.A.10: Marketing
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

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
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

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
Ritter Communications, Inc. FRN 0007864895

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
Ritter Communications, Inc. FRN 0007864895

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
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

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
Ritter Communications, Inc. FRN 0007864895

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

Explanatory Attachment
Special Access Data Request
Ritter Communications, Inc. FRN 0007864895

REDACTED