

**REDACTED – FOR PUBLIC INSPECTION**

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June 8, 2015

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

Re: GN Docket No. 13-5, *Technology Transitions*; GN Docket No. 12-353, *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*; WC Docket No. 05-25, *Special Access Rates for Price Cap Local Exchange Carriers*; RM-10593, *AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*; WC Docket No. 15-1, *Windstream's Petition for Declaratory Ruling Seeking to Confirm ILEC's Continued Obligation to Provide DS1s and DS3s on Unbundled Basis After Technology Transitions*

Dear Ms. Dortch:

In accordance with the Second Protective Orders for the above-referenced proceedings, Windstream Services, LLC ("Windstream") hereby submits a redacted version of the attached white papers by CostQuest Associates analyzing the economics of last-mile fiber deployment to non-residential customers.

With the prior approval of Commission staff, Windstream has designated for highly confidential treatment the marked portions of the highly confidential version of this document pursuant to the Second Protective Orders in GN Docket Nos. 13-5 and 12-353 and WC Docket No. 05-25 and RM-10593.<sup>1</sup> Highly confidential treatment is required to protect information about Windstream's wholesale costs, purchases and expenses.<sup>2</sup>

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<sup>1</sup> *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5 and 12-353, Second Protective Order, DA 14-273 (rel. Feb. 27, 2014) (IP Transition Second Protective Order); *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd. 17725 (2010) ("Second Protective Order"); *See also Special Access for Price Cap Local Exchange Carriers*, Letter from Sharon E. Gillett, Chief, Wireline Competition Bureau to Donna Epps, Vice

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Pursuant to the Second Protective Order, this redacted version of the document is being filed electronically via ECFS. Also pursuant to the Protective Order, Windstream is filing one copy of the highly confidential version with the Secretary, and sending two copies to Jonathan Reel, Competition Policy Division, Wireline Competition Bureau.

Please contact me if you have any questions or require any additional information.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
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Jennie B. Chandra

Attachments

cc: Jonathan Reel

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President, Federal Regulatory Affairs, Verizon, DA-12-199 (dated Feb. 13, 2012) (“Letter to Donna Epps”) (further supplementing the *Second Protective Order*).

<sup>2</sup> See IP Transition Second Protective Order at Appendix A.