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July 17, 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
Objection to Disclosure of Confidential and Highly Confidential Special Access
Data and Information**

Dear Ms. Dortch:

JSI, on behalf of its clients (“JSI SPADC Filers”) who filed full responses to the Special Access Data Collection (“SPADC”) in January and February 2015, hereby files this objection to disclosure of confidential and highly confidential data and information. The JSI SPADC Filers consist of rural competitive local exchange carriers, small cable companies, and rural wireless carriers. The information these companies provided in the SPADC is extremely sensitive and could reveal competitive and customer information simply by the fact that they are, in many cases, the only competitive provider in their service areas. The JSI SPADC Filers include companies that provided data and information as competitive providers, purchasers, and best efforts business broadband Internet access service providers.

Although the JSI SPADC Filers are confident in the FCC’s Data Protective Order¹ and the limitations placed on how requesting parties will be able to access and review SPADC data and information, it is of paramount importance that no identifying competitive or customer information about the JSI SPADC Filers be revealed (intentionally or unintentionally) in the SPADC data analysis. As such, the JSI SPADC Filers submit this objection to ensure that the FCC strictly adheres to the criteria set forth in the Protective

¹ See *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, 29 FCC Rcd 11657, 11665 (Wireline Comp. Bur. 2014) (“Protective Order”).

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Order and not allow any of the data analysis to facilitate a third party to associate the data with a specific carrier.² The foregoing standard for aggregate data analysis that does not allow identification of individual carriers should be applied to any requesting party in this proceeding now and to any such requesting party in the future. JSI SPADC filers are listed in the attached Appendix.

Please direct any questions regarding the filing to the undersigned.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

Attachments

cc: SpecialAccess@fcc.gov

² For example, data for a specific area would be withheld from a report if the single competitor could be identified.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Objection of the JSI SPADC Filers was served this 17th Day of July, 2015, by emailing true and correct copies thereof to the following persons representing the Requesting Parties identified in the Attachment to the Special Access Confidentiality Public Notice DA 15-810:

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APPENDIX

JSI Special Access Data Collection Filers

Advanced Tel, L.L.C.
Al-Call, Inc.
Anne Arundel Broadband, LLC
ATC Broadband
Baraga Telephone Company - CLEC
BEK Communications Cooperative
Ben Lomand Communications
Berkeley Cable Television, Inc. dba Home Telecom
Bixby Telephone Sales & Service Co.
Bulloch County Rural Tel. Co-op
Cable Co, LLC
Carolina Telecom
Cass Cable TV, Inc.
Cellular Services, LLC
CentraCom Interactive
Central Scott Telephone Company
Citizens Telephone Company, Inc.
Comlink
ComSouth Telenet
Consolidated Comm. Network, Inc.
CRC Communications
C-Spire
Cumberland Cellular, Inc. d/b/a Duo County Telecom
D&P Cable, Inc.
Daktel Communications, LLC
Dunkirk & Fredonia Telephone Company
Egyptian Telephone Cooperative Association
Ellijay Telephone Company
ETEX Communications, LP
Fairfield Communications
Farmers Cellular Telephone, Inc. (FCTi)
Fayetteville
FTC Diversified Services, LLC
Giles Craig Communications, Inc.
Grand River Mutual Cooperative
Great Lakes Comnet
Green County Partners, Inc.

Guadalupe Valley Communications Systems, L.P.
Hamilton County Communications, Inc.
Hancel Inc.
Hancock Communications
Hargray of Georgia Inc.
Hargray, Inc.
Highland Communications, LLC
Hill Country Telecommunications
Horry Telephone Cooperative, Inc. (CLEC)
Interstate Telecommunications Coop.
iRis Networks
ITS Telecommunications Systems, Inc.
Knology of Alabama
Knology of Florida
Knology of Georgia
Knology of Kansas
Knology of South Carolina
Knology of Tennessee
Lathrop Telephone Company
LBH
Leaco Rural Telephone Cooperative, Inc.
Lennon Telephone Company
LigTel Communications, Inc.
LVT Corp.
Mark Twain Communications Company
McDonough Telephone Cooperative
Metro Communications Company
MH Telecom, LLC
Mid-Century Telephone Coop
Mid-Maine Telecom LLC
Miles Communication
Mobi PCS
New Paris Telephone, Inc.
Ninestar/Central Indiana
Northland Communications, Inc.
Otelco Telecommunications
Palmetto Rural Telephone Cooperative
PBT Communications, Inc.
Peoples Communications
Perry-Spencer Communications, Inc.
Piedmont Communications Services, Inc.

Pine Belt Telephone Company, Inc.
Pineland Telecommunications
Plant TiftNet
Planters Communications
Plateau Telecommunications, Inc.
Poka Lambro Telecommunications, Ltd. d/b/a Poka Lambro Telephone Company (CLEC)
Polar Telcom, Inc.
PrimeLink, Inc.
PRT Communications, LLC
Public Service Telephone Company
Randolph Telephone Membership Corp.
Ritter Communications
RTC Solutions, Inc.
S&A Communications
SEI Data, Inc.
Shentel
Sigecom, LLC
SJI, L.L.C.
SkyBest Communications, Inc.
Springboard Telecom, LLC
StarVision, Inc.
Surry Telephone Membership Corp.
T.V. Service, Inc.
TC3 Telecom
TCT West, Inc.
Topsham Communications, LLC
Utah Basin Electronic Telecommunications, LLC dba STRATA Networks
Upper Peninsula Telephone Co.
Vast Broadband fka Knology Community Telephone, Inc.
Vast Broadband fka Knology of the Black Hills, LLC
Vermont Telephone Company, Inc.
Video Vision
Volunteer First Services, LLC
West Kentucky Rural Telephone Cooperative Corporation, Inc.
Westelcom Networks, Inc.
Western New Mexico Telephone Company
Wes-Tex Telecommunications, Ltd.
Westphalia Broadband, Inc.
WideOpenWest Cleveland, LLC
WideOpenWest Illinois, LLC
WideOpenWest Michigan, LLC

WideOpenWest Mid-Michigan, LLC
WideOpenWest Ohio, LLC
Wilkes Communications, Inc.
Winn Communications
Wiregrass Telecom, Inc.
WOW Business Services, LLC
Yadkin Valley Telecom