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September 22, 2015

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: *Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593*

Dear Ms. Dortch:

I hereby submit signed Acknowledgments of Confidentiality on behalf of Michele Farquhar, Nirali Patel, and Deborah Broderson of Hogan Lovells US LLP, outside counsel to Vodafone Group LTD ("Vodafone"), for purposes of reviewing confidential and highly confidential information filed in the above-referenced proceedings pursuant to the procedures established in the *Special Access Modified Protective Order*¹ and the *Special Access Second Protective Order*.²

The signatories have already filed, as outside counsel to Vodafone, signed Acknowledgments of Confidentiality pursuant to the *Data Collection Protective Order*³ for purposes of reviewing confidential and highly confidential information submitted in response to the Commission's special access data collection.⁴

¹ See *Special Access Rates for Price Cap Local Exchange Carriers*, Modified Protective Order, 25 FCC Rcd 15168 (WCB 2010) ("*Special Access Modified Protective Order*").

² See *Special Access Rates for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd 17725 (WCB 2010) ("*Special Access Second Protective Order*").

³ See *Special Access Rates for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (WCB 2014) ("*Data Collection Protective Order*").

⁴ Letter from Michele Farquhar, Counsel to Vodafone, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 05-25, RM-10593 (filed Sept. 11, 2015) (submitting *Data Collection Protective Order Acknowledgment of Nirali Patel*); Letter from Michele Farquhar, Counsel to Vodafone, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 05-25,

Pursuant to the *Special Access Modified Protective Order* and the *Special Access Second Protective Order*, this filing has been served on submitting parties, and a certificate of service is attached.

Please contact me directly with any questions at (202) 637-5663, or michele.farquhar@hoganlovells.com.

Respectfully submitted,

/s/ Michele Farquhar

Michele Farquhar
Counsel to Vodafone

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 05-25, RM 10593

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceedings, and I understand it. I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or consultant to a party or other person described in paragraph 4 of the foregoing Protective Order and that I will not use such information in any other capacity, nor will I disclose such information except as specifically provided in the Protective Order.

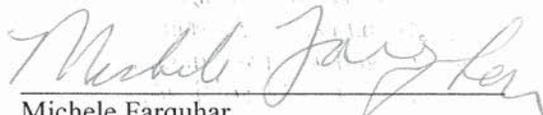
I hereby certify that I am not involved in "competitive decision-making" as that term is used in the definition of In-House Counsel in paragraph 4 of the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Confidential Documents and Confidential Information are used only as provided in the Protective Order; and (2) Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents or Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed at Washington, DC this 22 day of September, 2015.


Michele Farquhar
Partner, Hogan Lovells US LLP
555 13th Street NW, Washington DC 20004
(202) 637-5663

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I hereby acknowledge that I have received and read a copy of the foregoing Second Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Second Protective Order and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Second Protective Order. I acknowledge that a violation of the Second Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the Second Protective Order is due solely to my capacity as Outside Counsel or Outside Counsel of Record or Outside Consultant to a party or other person described in paragraph 9 of the foregoing Second Protective Order and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Second Protective Order.

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Executed at Washington, DC this 22nd day of September, 2015.


Michele Farquhar
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Executed at Washington, DC this 22 day of September, 2015.



Nirali Patel
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(202) 637-5543

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Nirali Patel
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555 13th Street NW, Washington DC 20004
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Deborah Broderson
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555 13th Street NW, Washington DC 20004
(202) 637-5873

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Executed at Washington, DC this 22nd day of September, 2015.



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CERTIFICATE OF SERVICE

I, Deborah Broderson, do hereby certify on this 22nd day of September 2015, I caused a copy of the foregoing letter and Acknowledgments of Confidentiality to be served by postage pre-paid mail on the following:

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