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October 15, 2015

Via ECFS

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

**Re: Special Access Rates for Price Cap Local Exchange Carriers, WC Docket
No. 05-25 and RM-10593**

Dear Ms. Dortch:

On October 13, in accordance with the Commission's October 7 Public Notice,¹ AT&T objected to the disclosure of its Confidential Information, Highly Confidential Information, and Highly Confidential Data to Mr. Bruce Kushnick under the *Data Collection Protective Order*,² *Modified Protective Order*,³ and the *Second Protective Order*⁴ (collectively, the "Protective Orders"). For the reasons AT&T expressed in its October 13 letter, Verizon also objects to the disclosure of its Confidential and Highly Confidential Information and Data to Mr. Kushnick under those orders.

Because neither Mr. Kushnick nor his company, New Networks Institute, are participants in this proceeding, and because Mr. Kushnick does not represent or otherwise consult for any participant to this proceeding, Mr. Kushnick does not qualify to obtain Confidential or Highly Confidential Information under the Protective Orders. He is not Outside Counsel of Record, Outside Consultant, or an employee of Outside Counsel or Outside Consultants, as defined by the Protective Orders.

¹ *Additional Parties Seeking Access To Data and Information Filed in Response to the Special Access Data Collection*, Public Notice, WC Docket No. 05-25, RM-10593; DA 15-1149 (Oct. 7, 2015) ("October 7 Public Notice").

² See *Special Access for Price Cal Local Exchange Carriers*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) ("*Data Collection Protective Order*").

³ See *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, 25 FCC Rcd 15168 (2010) ("*Modified Protective Order*").

⁴ See *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd 17725 (2010) ("*Second Protective Order*").

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The Commission should decline to authorize Mr. Kushnick's access to Confidential or Highly Confidential Information in this proceeding.

Very truly yours,

A handwritten signature in black ink, appearing to read "Curtis Beave". The signature is written in a cursive, flowing style.

Copies: Bruce A. Kushnick (via e-mail, bruce@newnetworks.com)
SpecialAccess@fcc.gov