



November 6, 2015

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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

Dear Ms. Dortch:

On Wednesday, November 4, 2015, Jonathan Banks, Diane Griffin Holland, and Patrick Brogan of the United States Telecom Association (USTelecom); Gary Phillips, Keith Krom, and Caroline Van Wie of AT&T; Curtis Groves and Frederick Moacdieh of Verizon; Carolyn Hammack of CenturyLink; AJ Burton of Frontier; Michael Bishop of Cincinnati Bell; Bobby Calzaretta and Glenn Woroch of Compass Lexecon, and Christopher Shenk of Sidley Austin LLP spoke with Deena Shetler, Eric Ralph, Shane Taylor, William Layton, Jack Erb, and Tracy Waldon of the Wireline Competition Bureau (WCB) by telephone to describe in detail several issues related to the data collection in above-referenced proceedings that became evident only after consultants retained by USTelecom's members gained access to and began to review the data collection.

Messrs. Calzaretta and Woroch of Compass Lexecon shared with WCB staff their views regarding the enormous task they face in reviewing and analyzing such an extraordinarily large and complex data collection, and expressed their belief that the amount of time provided to review, analyze, and report on the data is not commensurate with the magnitude of the task. They also discussed the implications of three past and planned updates to the data in the Enclave and the impact they have had and will have, and described other issues that have further exacerbated their ability to perform analyses. Specifically, they discussed the following:

- Each data update requires the consultants to determine the changes that were made and whether and how they impact their programs, to modify those programs to accommodate changes, and to re-run those programs. The first update and the one that is in process indicate that these same tasks will be required for the upcoming third planned data update.
- The flat file that identifies locations of CLEC fiber networks requested in Question II.A.5 has not been provided. This is a critical set of data that is necessary for meaningful analyses. WCB staff said they are preparing this file, but this task is very computationally intensive and consequently it is very time consuming.
- The consultants had asked that the linking between circuit elements billing (Questions II.A.12 and II.B.4) and circuit elements descriptions (Questions II.A.14.a and II.B.6.a) be repaired. NORC posted a ReadMe file on Nov. 4 claiming the repair had taken place, but it had not been done by the time of the call. The consultants subsequently learned that a file linking the two sets of data was posted later in the day.
- The consultants reiterated a request for the mapping of location addresses into geocode coordinates when only addresses for connection locations (Questions II.A.4 and II.B.3) were provided by respondents. The Readme file posted on Nov. 4 claimed that this had been done, but it had not been done by the time of the call. WCB staff said this would be done in two steps to be completed that same day. The consultants subsequently learned that a file linking addresses to coordinates was posted later in the day; however, there are still a nontrivial number of addresses without coordination information.
- The consultants' request that geocoding functionality be made available in the Enclave has not yet been resolved. NORC has installed the ArcGIS package and while it states that it is working on adding geocoding functionality to that ArcGIS software, it is not available on the Enclave at this time.
- The consultants repeated a request for software to be placed in the Enclave that has "PostGIS functionality" which would allow efficient geospatial queries on large datasets. NORC indicated that the *Vertica* SQL database currently available on the Enclave has the

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potential to conduct some geospatial queries via an add-on, and they would investigate whether their licensing agreements allow them to make that add-on available in the Enclave. This request has not yet been resolved.

Sincerely,

A handwritten signature in black ink, appearing to read "DGH", with a long horizontal flourish extending to the right.

Diane Griffin Holland

Vice President, Law & Policy

cc: Deena Shetler  
Eric Ralph  
Shane Taylor  
William Layton  
Jack Erb  
Tracy Waldon