



REDACTED – FOR PUBLIC INSPECTION

January 22, 2016

Meredith Singer  
202.719.7507  
msinger@wileyrein.com

1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
MCLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wileyrein.com

VIA ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St., S.W. - The Portals  
Washington, D.C. 20554

Re: *Verizon's Second Supplemental Response to FCC's Information and Data Request dated October 9, 2015, MB Docket No. 15-149*

Dear Ms. Dortch:

Pursuant to the instructions set forth in the Commission's Information and Data Request dated October 9, 2015 ("Request")<sup>1</sup> and the Protective Order adopted in this proceeding, enclosed please find the Second Supplemental Response of Verizon to the Request ("Verizon's Response"). Verizon's Response contains highly confidential information subject to the Protective Order in this proceeding.<sup>2</sup>

At the direction of the Request and the Protective Order, one copy of the redacted version of Verizon's response is being filed electronically through the Commission's Electronic Filing Comment System ("ECFS"). In addition, one unredacted, highly confidential copy of Verizon's Response is being filed with the Secretary's Office. Finally, two unredacted, highly confidential copies of Verizon's Response are being hand delivered to Ms. Vanessa Lemmé of the Media Bureau's Industry Analysis Division.

Please direct any questions concerning this letter to Nancy J. Victory (at 202.719.7344 or nvictory@wileyrein.com) or to the undersigned.

---

<sup>1</sup> *In the Matter of Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Transfer Control of Licenses and Authorizations*, MB Dkt. 15-149, Letter from William T. Lake, Chief, Media Bureau to William H. Johnson, Esq. (Oct. 9, 2015).

<sup>2</sup> *In the Matter of Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Transfer Control of Licenses and Authorizations*, MB Dkt. 15-149, Order, FCC 15-110 (rel. Sept. 11, 2015).



**REDACTED – FOR PUBLIC INSPECTION**

Second Supplemental Response to Information Request  
January 22, 2016  
Page 2

Best regards,

*/s/ Meredith Singer*

Meredith Singer

Attachments

cc: Vanessa Lemmé  
Ty Bream  
Elizabeth McIntyre  
Adam Copeland  
Jim Bird

January 22, 2016

**Verizon's Second Supplemental Responses  
to the Media Bureau's October 9, 2015 Information Request**

**Request No. 9:** *Provide the Company's internet traffic exchange data as specified in Attachment D.*

Responsive information is attached in Exhibit 9.1. Exhibit 9.1 is designated as Highly Confidential Information and is subject to a request that it be treated as Highly Confidential Information under the September 11, 2015 Protective Order.

Request No. 9 seeks customer-specific Internet traffic exchange data such as capacity and utilization. In the ordinary course of business, Verizon typically tracks this type of data for only the settlement-free and paid-peering customers with which it exchanges the largest amounts of traffic.

"Sales of Transit Service" and "Transit Purchase Node" Tables

Responsive information is provided in the worksheets entitled "Transit Sale Traffic" and "Transit Sale Revenues." The worksheet entitled "Transit Sale Traffic" shows responsive traffic data. The worksheet entitled "Transit Sale Revenues" shows revenues that Verizon received from its top 25 transit customers during the specified time period. The data that Verizon maintains in the ordinary course of business does not separately identify "transit" payments made by its customers. Verizon has searched its records for the revenue categories that most closely correspond to the definition of transit provided in the instructions. It is possible, however, that those revenue categories do not include all "transit" revenue for the listed entities or include revenue from other services that are not "transit."

Verizon has anonymized certain customer names where our Internet interconnection agreements with those customers include confidentiality provisions. Verizon will supplement its responses upon receiving those customers' consent.

"Purchases of Transit Service" Table

As stated in its December 23 responses, Verizon did not purchase transit service during the specified time period.

"Sales of Paid Peering" and "Paid Peering Nodes" Tables

Responsive information is provided in the worksheets entitled "Paid Peer Traffic," "Paid Peer Traffic – Hub," "Paid Peer Revs. – Enterprise PP," and "Paid Peer Revs. – Wholesale PP." The worksheet entitled "Paid Peer Traffic" shows traffic data for Verizon's paid-peering customers. The worksheet entitled "Paid Peer Traffic - Hub" shows traffic data by interconnection hub for Verizon's paid-peering customers. The worksheet entitled "Paid Peer

## **REDACTED – FOR PUBLIC INSPECTION**

Revs. – Enterprise PP” shows paid-peering payments that Verizon received from its enterprise customers. Verizon has withheld one customer’s information from this worksheet because the customer has not yet consented to disclosure of its information. Verizon will supplement its responses upon receiving the customer’s consent. The worksheet entitled “Paid Peer Revs. – Wholesale PP” shows revenues that Verizon received from wholesale customers for paid peering. As maintained in the ordinary course of business, Verizon’s wholesale data does not separately identify paid-peering payments made by wholesale customers. Therefore, the revenues reflected on the Paid Peer Revs. – Wholesale PP spreadsheet are for paid peering in addition to other services purchased by these customers.

### “Settlement-Free Peering Traffic” and “Settlement-Free Peering Node” Tables

Responsive information is provided in the worksheets entitled “SFP Traffic,” “SFP Traffic – Hub,” and “SFP P95 and Payments.” The worksheet entitled “SFP Traffic” shows responsive traffic data. The worksheet entitled “SFP Traffic – Hub” shows responsive traffic data by interconnection hub. The worksheet entitled “SFP P95 and Payments” includes responsive 95th-percentile-utilization information that Verizon tracks and maintains in the ordinary course of business. Verizon’s agreements with the referenced companies describe how the 95th-percentile measurements are calculated. The “SFP P95 and Payments” spreadsheet also shows amounts Verizon paid to or received from other network providers with which it interconnects.

**REDACTED – FOR PUBLIC INSPECTION**

**Exhibit 9.1 has been redacted in its entirety as highly confidential information.**