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March 1, 2016

Ex Parte

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

**Re: Investigation of Certain Price Cap Local Exchange Carrier Business Data Services
Tariff Pricing Plans, WC Docket No. 15-247; Special Access Rates for Price Cap
Local Carriers, WC Docket No. 05-25 and RM-10593**

Dear Ms. Dortch:

In accordance with the Protective Orders in these proceedings,¹ Verizon has designated as Highly Confidential Information certain information included in the attached *ex parte* letter, which Verizon is filing today. This information, “if released to competitors, would allow those competitors to gain a significant advantage in the marketplace.”²

The information qualifies as Highly Confidential Information because it contains highly detailed or granular customer or geographic information regarding:

- “The extent to which companies rely on incumbent local exchange carrier (ILEC) and non-incumbent LEC last-mile facilities and local transport facilities to provide special access-like services and the nature of those inputs,”³ and
- “The types of customers companies serve and the types of special access-type services demanded by those customers.”⁴

¹ *Investigation of Certain Price Cap Local Exchange Carriers Bus. Data Servs. Tariff Pricing Plans, et al.*, Order and Protective Orders, 30 FCC Rcd 13680 (2015) (“*Tariff Investigation Protective Order*”); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) (“*Data Collection Protective Order*”); *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, 25 FCC Rcd 15168 (2010) (“*Modified Protective Order*”); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd 17725 (2010) (“*Second Protective Order*”).

² See *Second Protective Order*, ¶ 3.

³ *Id.* ¶ 6.

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In addition, the information Verizon has designated Highly Confidential includes information on revenues, order volumes, business wins and losses, marketing plans, and related information that is analogous to information that could have been designated Highly Confidential in accordance with the *Data Collection Protective Order*.⁵

Therefore, consistent with the letter and spirit of the protective orders, this information qualifies as Highly Confidential.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Curtis Beavey".

⁴ *Id.*

⁵ See *Data Collection Protective Order* at Appendix B.