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FOUNDED 1866

March 16, 2016

**REDACTED – FOR PUBLIC RELEASE**

**By Hand Delivery**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
455 12th Street, S.W.  
Washington, DC 20054

Re: WC Docket No. 05-25, RM-10593; **Public Version** of Response to Request for Data Regarding the Compass Lexecon White Paper

Dear Ms. Dortch:

We are providing the enclosed CD in response to Commission Staff's request for data related to the White Paper, *Competitive Analysis of the FCC's Special Access Data Collection*, submitted by Mark Israel, Daniel Rubinfeld, and Glenn Woroch on January 26, 2016. Per your request, the enclosed CD contains a password protected Excel spreadsheet, which lists the Census blocks that the Compass Lexecon economists identified as having Special Access demand. For each such Census block the spreadsheet identifies (1) whether the Census block had a competitor in it based on what Staff terms the "narrower" definition of competition; (2) whether the Census block had competition based on what Staff terms the "broader" measure of competition; (3) the differences in the Census blocks that were found to have competition under the "narrower approach" and the "broader approach"; and (4) the number of establishments reported by Dun and Bradstreet in the Census block.

The contents of the enclosed CD are **Highly Confidential Information**, as defined by the *Protective Orders*<sup>1</sup> in this matter, and should not be made publicly available.

<sup>1</sup> Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Modified Protective Order*, 25 FCC Rcd 15168 (2010); Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Second Protective Order*, 25 FCC Rcd 17725 (2010); Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Order and Data Collection Protective Order*, 29 FCC Rcd 11657 (2014) ("*Data Collection Protective Order*").



Marlene H. Dortch  
March 16, 2016  
Page 2

Respectfully submitted,

A handwritten signature in black ink that reads "Kyle Fiet".

Kyle J. Fiet

Enclosure

cc: Christopher Koves  
Eric Ralph

**THE CD THAT IS ENCLOSED WITH THIS LETTER  
CONTAINS HIGHLY CONFIDENTIAL INFORMATION THAT  
IS NOT BEING INCLUDED IN THE PUBLIC RECORD**