

April 20, 2016

VIA ECFS

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

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

Dear Ms. Dortch:

NORC has made available in the Secure Data Enclave a dataset, prepared at my direction, containing data on the number of competitors in a building based on the Highly Confidential data submitted in the data collection. The dataset is available to Commission staff and to parties that have signed the Protective Orders and are authorized to access the Secure Data Enclave.¹

The dataset "fcc_loc_export" was created by taking the methodology used to count competitors in a building for the Baker Declaration and applying it to the Commission's Method 2 building definitions.² It aims to report information on the level of competition present at each building as identified by the Commission. The results reported in the Baker Declaration were based on a different set of building definitions created using a different matching and cleaning process. The provided dataset only applies the competitor count methodology to the Commission's data; it does not purport to account for the building identification process or any other assumptions made in the Baker Declaration.

Creation of the "fcc_loc_export" dataset relies on the following input datasets in the Secure Data Enclave:

- vwIIA4_CP_LOCATION_DATA
- vwIIA04_Building_xWalk_Method2
- vwIIB3_ILEC_LOCATION_DATA
- vwIIB03_Building_xWalk_Method2
- vwCensusBlocksWithFiber

¹ See *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Order and Data Collection Protective Order, DA 14-1424, 29 FCC Rcd. 11,657 (Wireline Comp. Bur. 2014); *Special Access Rates for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access Rates for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Protective Order, DA 15-1837, 30 FCC Rcd. 13,680 (Wireline Comp. Bur. 2015).

² See Declaration of Jonathan B. Baker on Market Power in the Provision of Dedicated (Special Access) Services, WC Docket No. 05-25, RM-10593 (originally filed Jan. 27, 2016).

- Zip Code and Census Block layers for ArcGIS available in the Data Enclave

The dataset includes the following variables:

- Buildingid
 - Unique building identifier from the Commission's Method 2 datasets.
- geoid
 - Census Block GEOID resulting from the Commission's Method 2 analysis.
 - In 5 instances, the same building was assigned to multiple census blocks for different Filer FRNs. For this dataset, those buildings were manually corrected to use a single census block for all Filer FRNs.
- Zip
 - Zip code for the building based on the latitude and longitude provided in the Commission's Method 2 datasets.
- owned_clec_tot
 - The number of CLECs who can provide dedicated service to a building through a physical (non-UNE/UCL) connection.
 - A CLEC is considered to be a physical competitor if it owns at least one connection to the building or leases it through an IRU.
- owned_tot
 - The total number of ILEC and CLEC competitors who can provide dedicated service to a building.
 - An ILEC is always assumed to be present.
- fiber_near2
 - The number of additional CLECs that reported fiber near the building in response to II.A.5
 - These are identified as CLECs with fiber in a census block (as identified by the Commission in the vwCensusBlocksWithFiber dataset) within 0.5 miles of a building's latitude and longitude.
 - This number excludes CLECs that already have a physical presence in a building.
- une
 - A 0/1 flag that indicates whether or not a building is being serviced over a UNE/UCL.
 - Takes the value '1' when at least one CLEC reports a connection to a building over a UNE/UCL.

Please do not hesitate to contact me at 202-274-4315 if you have any questions regarding this submission.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jonathan Baker". The signature is fluid and cursive, with the first name "Jonathan" and last name "Baker" clearly distinguishable.

Jonathan Baker