

LAWLER, METZGER, KEENEY & LOGAN, LLC

1717 K STREET, NW  
SUITE 1075  
WASHINGTON, D.C. 20006

EMILY J. H. DANIELS  
edaniels@lawlermetzger.com

PHONE (202) 777-7723  
FACSIMILE (202) 777-7763

April 25, 2016

*Via Electronic Filing*

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; Special Access Rates for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rules for Interstate Special Access Services*  
WC Docket Nos. 15-247 and 05-25; RM-10593

Dear Ms. Dortch:

Pursuant to the Order and Protective Orders adopted in the above-referenced proceeding,<sup>1</sup> the attached Acknowledgments of Confidentiality are being submitted for inclusion in the record.

The attached Acknowledgments have been signed by one additional attorney with Lawler, Metzger, Keeney & Logan, LLC (“Lawler Metzger”), Outside Counsel of Record to Sprint Corporation (“Sprint”): John W. Castle. He is not involved in “Competitive Decision-Making” as defined in the Business Data Services Data Collection Protective Order and the Tariff Investigation Protective Order.<sup>2</sup>

---

<sup>1</sup> *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans; Special Access for Price Cap Local Exchange Carriers*, WC Docket Nos. 15-247 and 05-25, RM-10593, Order and Protective Orders, DA 15-1387 (rel. Dec. 4, 2015).

<sup>2</sup> See *id.* at Appendix A, ¶ 1, and Appendix B, ¶ 1.

Marlene H. Dortch  
April 25, 2016  
Page 2

The undersigned requests that Mr. Castle be permitted to access the confidential and/or highly confidential versions of all documents that have been filed and data or other information that have been collected, or that may be filed or collected in the future, with respect to the Business Data Services Data Collection Protective Order and the Tariff Investigation Protective Order in the above-referenced proceeding. The undersigned is not requesting that copies of any previously-filed documents be provided at this time. Should Lawler Metzger request copies of confidential and/or highly confidential information filed by any parties in the future, the undersigned will coordinate with Submitting Parties at that time.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Emily J. H. Daniels  
Emily J. H. Daniels

Attachments

cc: TariffInvestigation@fcc.gov

**APPENDIX A**  
**Attachment 1**

**Business Data Services Data Collection Protective Order**  
**Acknowledgment of Confidentiality**  
**WC Docket No. 15-247**

I am seeking access to  only Confidential Information or  Confidential and Highly Confidential Information.

I hereby acknowledge that I have received and read a copy of the foregoing Business Data Services Data Collection Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Business Data Services Data Collection Protective Order and that I shall not disclose or use Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, or Highly Confidential Information except as allowed by the Business Data Services Data Collection Protective Order.

I acknowledge that a violation of the Business Data Services Data Collection Protective Order is a violation of an order of the Federal Communications Commission (Commission). I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Business Data Services Data Collection Protective Order, including but not limited to suspension or disbarment of Counsel or Outside Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential or Highly Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Business Data Services Data Collection Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential or Highly Confidential Information in a manner not authorized by this Business Data Services Data Collection Protective Order.

I certify that I am not involved in Competitive Decision-Making.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Business Data Services Data Collection Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as a person described in paragraph 6 of the Business Data Services Data Collection Protective Order and agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents and Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Business Data Services Data Collection Protective Order and to ensure that there is no disclosure of Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, and Highly Confidential Information in my possession or in the possession of those who work for me, except as provided in the Business Data Services Data Collection Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Confidential Information and Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Business Data Services Data Collection Protective Order.

Executed this 25 day of April, 2016.



John W. Castle  
Associate  
Lawler, Metzger, Keeney & Logan, LLC  
1717 K Street NW, Suite 1075  
Washington, DC 20006  
202-777-7700

**APPENDIX B**  
**Attachment 2**

**Tariff Investigation Protective Order**  
**Acknowledgment of Confidentiality**  
**WC Docket No. 15-247**

I am seeking access to [ ] only Confidential Information or [X] Confidential and Highly Confidential Information.

I hereby acknowledge that I have received and read a copy of the foregoing Tariff Investigation Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Tariff Investigation Protective Order and that I shall not disclose or use Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information or Highly Confidential Information except as allowed by the Tariff Investigation Protective Order.

I acknowledge that a violation of the Tariff Investigation Protective Order is a violation of an order of the Federal Communications Commission (Commission). I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Tariff Investigation Protective Order, including but not limited to suspension or disbarment of Counsel or Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential or Highly Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Tariff Investigation Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential or Highly Confidential Information in a manner not authorized by this Tariff Investigation Protective Order.

I certify that I am not involved in Competitive Decision-Making.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Tariff Investigation Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as an employee of Counsel, Outside Consultant, or Outside Firm, and I agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents and Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Tariff Investigation Protective Order and to ensure that there is no disclosure of Confidential Information or Highly Confidential Information in my possession, in the possession of those who work for me or in the possession of other Support Personnel, except as provided in the Tariff Investigation Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Confidential Information and Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Tariff Investigation Protective Order.

Executed this 25 day of April, 2016.

  
\_\_\_\_\_  
John W. Castle  
Associate  
Lawler, Metzger, Keeney & Logan, LLC  
1717 K Street NW, Suite 1075  
Washington, DC 20006  
202-777-7700