

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<p>In the Matter of</p> <p>Special Access Rates for Price Cap Local Exchange Carriers</p> <p>AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services</p>	<p>WC Docket No. 05-25</p> <p>RM-10593</p>
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COMMENTS

XO Communications, LLC (“XO”), by its attorney, hereby files its comments in response to the Public Notice issued by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceedings on November 5, 2009.¹

I. INTRODUCTION AND SUMMARY

In the *November 5th Public Notice*, the Commission invites comment on “an appropriate analytical framework for examining the various issues that have been raised in the *Special Access NPRM*” to determine whether the current rules “are working as intended.”² More specifically, the Commission seeks “an analytical approach enabling a systematic determination of whether or not the current regulation of special access services is ensuring rates, terms, and conditions” are “just and reasonable as required by the Act.”³ This will enable the Commission to “determine what, if any specific problems there are with the current regime and formulate

¹ Parties Asked To Comment on Analytical Framework Necessary To Resolve Issues In The *Special Access NPRM*, WC Docket No. 05-25, RM-10593, Public Notice, DA 09-2388 (rel. Nov. 5, 2009) (“*November 5th Public Notice*”).

² *Id.*, at 1

³ *Id.*, at 2.

specific solutions as necessary.”⁴ The *November 5th Public Notice* then provides five illustrative analytical frameworks that might prove useful in reviewing the state of competition in the special access markets.

XO supports the Commission’s efforts to craft a sound analytical approach to examine whether there is effective competition in the provision of special access services by incumbent local exchange carriers (“ILECs”).⁵ Because of the dearth of local facilities provided by alternative vendors – and the importance of these facilities for the development of local competition in business markets and provision of affordable broadband services for all consumers -- the Commission needs to ensure that ILEC special access services are offered at just and reasonable rates, terms, and conditions.

XO is a facilities-based competitive local exchange carriers (“CLEC”) that purchases (leases) special access circuits from ILECs and various competitive providers. In addition, XO supplies special access circuits in certain markets. It is from these perspectives that it – along with other members of the Alliance for Competitive Telecommunications (“ACTel”), a group of facilities-based competitive telecommunications providers -- engaged in a rigorous empirical economic analysis of the special access (or local private line) markets, adhering to the

⁴ *Id.*

⁵ XO has participated extensively in WC Docket No. 05-25 and believes the ILECs possess market power in the provision of special access circuits in all geographic markets which permit them to price far above levels found in competitive markets and earn supra-competitive profits. Moreover, ILECs have sought to lock-in their market power by imposing exclusionary terms and conditions in their term and volume agreements. Along with other entities that purchase these circuits at wholesale and end users who purchase the circuits at retail, it has submitted evidence in this docket demonstrating the validity of its claims and calling for the Commission to re-regulate the ILECs in the provision of these circuits. XO believes that when the Commission conducts the market power analysis set forth in these comments and sees the unconscionable profit margins earned by the ILECs, it will share the conclusions of XO about the ILECs’ market power, eliminate the flawed “collocation triggers” enabling pricing flexibility, which were adopted by the Commission in the 1999 *Access Charge Reform Report and Order* (14 FCC Rcd 14221) (“*Pricing Flexibility Order*”), and impose a sound regulatory regime.

analytical framework of the *Horizontal Merger Guidelines*,⁶ during the review by the Department of Justice and Commission of the acquisitions of AT&T Corp. by SBC Communications, Inc and MCI, Inc. by Verizon Communications Inc. in 2005 (the “Bell Mergers”). While that analysis was conducted as part of mergers, the underlying issues and the relevant framework for analysis are essentially identical to that before the Commission in examining the state of competition in the special access markets. A market power analysis – whereby an assessment is made of profit margins of ILECs supplying special access circuits to determine whether they are at competitive levels – is, according to the *HMG*, the best framework for determining whether special access markets are competitive. Further, because such profit margins will indicate how much these margins differ from those in competitive markets, they will provide the type of precise information required by the Commission to establish a new regulatory regime.

The Commission does not need to look far for support of this analytical approach.

It was first proposed by AT&T when it filed the petition⁷ upon which this proceeding is based.

As AT&T stated:

In fully competitive markets, market forces drive prices toward costs...Any attempt by a firm in a competitive market to charge prices that would allow it to earn more than a normal, risk-adjusted rate-of-return would cause the firm to lose business to other firms that charged prices that reflect the lower level of return that would still be sufficient to induce investment. It is precisely for these reasons that the very definition of monopoly profit is a return in excess of normal profits.⁸

Further, tw telecom inc. supported this approach in a recent *ex parte* filing:

⁶ U.S. Department of Justice & Federal Trade Commission, *Horizontal Merger Guidelines* 2 (rev. 1997), available at: www.usdoj.gov/atr/public/guidelines/hmg.htm. (“*HMG*”)

⁷ Petition of AT&T Corp., *Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593 (filed Oct. 15, 2002).

⁸ *Id.*, at 8-9.

Any information gathering effort should focus primarily on obtaining the incumbent LEC cost information needed to determine the incumbents' special access profit margins. As Dr. Stanley Besen explains in the declaration attached hereto, the incumbents' profit margins are the best measure of the extent to which incumbents have market power in the provision of special access.⁹

In contrast to an examination of market power through the lens of profit margin analysis, the other analytical frameworks illustrated by the Commission, particularly the structural frameworks posed in Examples 2 and 3 which involve an examination of competitive facility deployment and potential deployment, cannot result in the provision of precise indicia of the extent to which special access markets are competitive, and, in fact, will result in a quagmire, sapping Commission focus and energies, as parties submit endless fiber maps and argue with no end about whether service can be provided or extended over such facilities.¹⁰ The Commission has experienced that "shouting match" for the past five years in its re-examination of its special access rules, and it has produced no results. This time around the Commission should seek the

⁹ Letter of Thomas Jones, Counsel, tw telecom inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-25 (filed July 9, 2009). ("TWTC Ex Parte") The Declaration of Stanley M. Besen attached to this filing also provides a clear and cogent rebuttal to the ILECs' argument that they do not have market power because prices for special access services have declined. Dr. Besen states, "The important point here is that the difference between a competitive and a monopolistic industry is not the direction of, or rate at which, their respective prices *change* during a given period but the fact that a monopolist charges a *higher* price relative to marginal cost than does a competitive firm." Dr. Besen's conclusion is supported in the Declaration of Joseph Farrell, appended to the Reply Comments of CompTel in WC Docket No. 05-25 (filed July 29, 2005 at ¶¶ 41-41): "Even a monopoly will reduce price if marginal costs fall or if demand becomes more elastic...It is clear that...it logically is the *relative levels* of price and cost, not the *rate of change* of price, that matter."

¹⁰ Former officials of both the Department of Justice's Antitrust Division and the Federal Trade Commission have criticized the use of structural analysis when better data is available. See, e.g., Abbot B. Lisky, Jr., Antitrust Economics, 12 Geo. Mason L. Rev. 163 92003; Timothy J. Muris, Improving the Economic Foundations of Competition Policy, Geo. Mason L. Rev. Winter Symposium, Jan. 15, 2003. Structural analysis may have a role when no data is available and empirical analysis cannot be performed, but it is far less reliable than analysis of actual market data. Also, see, TWTC Ex Parte (at 10), which states, "Incumbent LECs' margins reflect their ability to charge supra-competitive prices in light of the limited competition they face in the market. That limited competition is in turn largely a function of the limited coverage of competitors' networks. An analysis of the incumbents' profit margins therefore obviates the need to engage in an onerous and costly assessment of non-incumbent LECs' network coverage."

best, most relevant data on the extent of competition – the profit margins of ILECs --and conduct the most critical, market power analysis.

II. ACTEL'S ECONOMIC ANALYSIS OF THE BELL MERGERS AND ITS RELEVANCE TO THE COMMISSION'S PROCEEDING

The *HMG* focuses on whether a merger will “create or enhance market power” or “facilitate its exercise.”¹¹ Firms that exercise market power effectively “transfer wealth from buyers to sellers,” misallocating resources.¹² In the Bell Mergers, the key question was whether, because AT&T and MCI were key suppliers of special access circuits, their acquisition by SBC and Verizon, respectively, would enhance the market power of SBC and Verizon. XO and other ACTel members, as purchasers of these circuits from the entities involved in the mergers, conducted an empirical economic analysis of the effects these mergers, which demonstrated that they would enhance market power by a significant degree – raising prices by more than 5% over the relevant period. Much of this analysis was effectively accepted by the Department of Justice, which sought divestitures of special access facilities owned by AT&T and MCI, although the Department fashioned a much more limited remedy than ACTel believed was warranted by the evidence.¹³

¹¹ *HMG* at 2.

¹² *Id.*, at 3.

¹³ The Department of Justice sought divestitures only for channel termination circuits where AT&T or MCI was the only supplier – a “2 to 1” situation – rather than for all circuits where competition was diminished. This appears to have been based on rudimentary structural analysis that sought to predict how providers might behave in the face of potential entry by rival firms. As noted in the prior footnote, such structural analysis, by its very nature, can only offer indirect inferences regarding the competitive effects of the proposed merger (which is why XO urges the Commission not to accept that as the appropriate analytical framework). In contrast to the Department’s structural analysis, ACTel conducted extensive empirical studies of the performance of the relevant markets to directly evaluate the likely competitive effects of the mergers. As discussed below, the ACTel’s analysis demonstrated that competition would be diminished by a statistically significant amount in all situations. If merger remedies are supposed to restore the competitive market conditions that existed prior to the merger, it is difficult to argue that the remedies proposed by the Department were sufficient. There are no alternative

More specifically, the economic analysis conducted by ACTel was based on extensive files of actual bid receipt and purchase records of special access circuits kept by these purchasers in the ordinary course of business. These records indicated the suppliers of the circuits, the actual prices offered by the suppliers, and whether the transactions were completed. Using these data sets, which contained over 6,000 DS1 and DS3 circuits (both channel terminations and interoffice transport), and well-accepted economic and statistical methodologies, economists retained by ACTel analyzed performance in the special access markets, for example: how prices are affected by the number of facilities-based and partially facilities-based suppliers and how the prices likely would be affected if AT&T and MCI were acquired. They found that: (1) AT&T and MCI offered their special access circuits for sale more than any other suppliers except SBC and Verizon; (2) the larger the number of suppliers offering a particular circuit, the lower the price the purchasers paid; and (3) the mere presence of AT&T and MCI as bidders lowered the prices paid by other suppliers, including SBC. Several examples of the analysis should prove instructive:

- An analysis of the bids for or purchase of over 400 DS3 circuits in SBC's service areas, using a regression model that included a single variable for the total number of available carriers, found that the presence of AT&T as a supplier lowered SBC's annual transport rate in a statistically significant manner by more than \$2,000. Moreover, the presence of each additional carrier lowered the rate by more than \$1,300. This effect was observed for every increase in the number of providers supplying circuits.

suppliers of special access circuits in the market today either individually or in aggregate that have nearly the competitive presence that AT&T or MCI possessed.

- An analysis of the bids for or purchase of over 600 DS1 and DS3 circuits in SBC's service area found that removing AT&T as a bidder would cause prices for all circuits to increase by between 13% and 25%. This increase was even more pronounced on circuits served by AT&T entirely over its own facilities – between 51% and 74%. Where AT&T combined its circuits with those of SBC, the increase was much smaller – between 4% and 14%.
- An analysis of the bids for or purchase of over 400 DS1 circuits in Verizon's service area found that removing MCI as a bidder would cause prices for all circuits to increase by 10% to 14%. Where MCI supplied circuits entirely over its own facilities, the increase in prices was substantially greater – between 38% and 50%. Where MCI combined circuits with those from Verizon, the increase was between 1% and 5%.

In sum, the analysis of prices (and effectively of Bell profit margins) found that the presence of AT&T and MCI caused statistically and economically significant reductions in observed prices and that with each additional supplier, prices decreased further (approaching cost).

While XO acknowledges that the Commission's special access analysis will differ somewhat in approach from the analysis undertaken by ACTel in regard to the mergers, it is in essence the same analysis the Commission needs to undertake in determining whether special access markets are competitive – a determination of whether the profit margins of the ILECs from the supply of special access circuits are those found in competitive markets. In the following section, XO provides greater detail on its proposed market power analysis the Commission should employ in examining special access markets.

III. XO'S PROPOSED MARKET POWER ANALYTICAL FRAMEWORK

A. Market Definition

The relevant product markets for special access circuits are characterized by at least two key elements: points connected by the transmission link and the capacity of the link. In regard to the points connected, special access circuits are offered on a dedicated basis as: stand-alone channel termination transmission facilities (sometimes called loops) connecting a building (premises) to a carrier facility; standalone transport facilities connecting carrier facilities; or a combination of a channel termination facility with a transport facility which enables a building to be connected to a more distant carrier facility. In regard to the capacity of the link, special access circuits are provided as smaller DS1 (1.54 Megabits per second (“Mbps”)) circuits and significantly larger DS3 (44.74 Mbps) circuits and various circuits of much larger capacity (*e.g.*, OC3, 155.52 Mbps). The Commission should analyze separately circuits based on points connected and capacity.

The relevant geographic markets are the point-to-point connections of the special access circuits, almost all of which originate and terminate within a single metropolitan area. That means that each building or, assuming circuits can be readily provisioned between buildings, such as in a campus environment, small group of buildings is a separate market. While it may be impractical for the Commission to analyze every point-to-point connection, it can either choose to study all these connections in a limited geographic area (*e.g.* a local exchange) or select a random sample of circuits over a much larger geographic area (*e.g.* a Metropolitan Statistical Area or larger region).

One final element should be factored into the Commission’s market definition calculus. Special access circuits are parts of supplier networks, that is, they are part of a “networked market.” This means that the price, terms, and conditions offered for any individual circuit is a function of other factors, including the size and quality of the rest of the supplier’s

network and the overall customer traffic on the supplier's network. In other words, size and scale count materially. For a supplier to be a true alternative in the market, it must have a network with sufficient capacity and reach.

B. Empirical Economic Analysis to Determine Profit Margins of ILECs

As discussed above, the Commission should conduct an empirical economic analysis to determine whether ILEC profit margins are supra-competitive – and hence whether they have market power -- in the relevant markets where pricing flexibility has been granted pursuant to the *Pricing Flexibility Order* (“*Price Flex Markets*”). In their analysis of the Bell Mergers, members of ACTel, as purchasers of special access circuits, first gathered data about recent prices paid (or offers received) for special access circuits they acquired from various suppliers (incumbent and competitive), distinguishing between circuits provided over facilities that were entirely on-net (Type 1) and partially or entirely off-net (Type 2). These prices were based either on bids by suppliers or Master Service Agreements (“MSAs”) with suppliers. Based on XO's experience, today most circuits are purchased by MSAs, with select circuits purchased by bid. Thus, the Commission should obtain, subject to robust confidentiality protections discussed later in these comments, detailed market pricing data from both purchasers and suppliers for each product market and for specific geographic areas that represent a statistically significant sample of markets. These data should include “rack rate” as well as prices subject to term, volume, or other discounts.

The Commission also needs to gather cost data from ILECs for circuits for which it has obtained pricing. While getting access to such data in this proceeding has proven to be highly contentious, the Commission should continue to insist that ILECs provide these data. However, there is a second best solution (proxy) which can be derived from ACTel's analysis in the Bell Mergers and which should prove sufficient for the Commission's purposes: prices on

circuits tend to approach marginal cost as the number of suppliers increases. This means the Commission can establish “cost benchmarks” for each market by examining routes with the most suppliers. Further, once the Commission has established these benchmarks, it can assess their relationship to another known set of costs – the “TELRIC” costs used to establish prices for unbundled network elements – which may provide additional data to support its analysis.¹⁴ Thus, should it not be able to obtain ILEC data or should it find such data is not reliable, e.g. concerns about allocations of common costs, the Commission should be confident that it has a substitute source to use for its analysis.

With price and cost data in hand, the Commission can calculate ILEC profit margins for circuits in *Price Flex Markets* to determine whether they exceed those found in competitive markets, that is, whether the margins are supra-competitive. This will then provide the basis for the Commission to determine the extent of price regulation that should be imposed.

Once the Commission determines whether the ILECs possess market power, it then needs to not only reset prices and order a fresh look of existing contracts but also examine the terms and conditions of special access offerings to determine whether they are exclusionary, that is, the actions taken by the ILEC are profitable only because of their anti-competitive effect. In competitive markets, contracts with volume and term discounts do not generally raise competitive concerns, and, in fact, can be beneficial. However, in markets where firms possess

¹⁴ To address possible concerns that special access markets are characterized by “umbrella” pricing (where, even if there are multiple competitors, prices do not approach marginal cost), the Commission may rely on relationships it develops between special access and unbundled network element prices in markets where it is more confident that prices are close to marginal cost. The Commission also can obtain information about prices offered pre-Bell Merger by ILECs and CLECs. Members of ACTel placed such information in the record in these Commission proceedings.

In addition, the Commission can compare profit margins with areas where ILECs have received pricing flexibility to determine whether the dubious collocation triggers in the current regulatory scheme have any validity whatsoever.

market power (indicated by having supra-competitive profit margins), that is not the case, and such terms and conditions – which XO argues are present in many ILEC special access contracts -- can be wielded as weapons to sustain such market power.¹⁵

In a Declaration filed in the precursor to this proceeding, Michael Pelcovits, an economist with MiCRA, explained common forms of exclusionary practices with which the Commission should be concerned:

- 1) Quantity discounts, individually negotiated with each customer, where the discount is paid back to the “first dollar” when the designated quantity is met.
- 2) Market share discounts which reward a customer that purchases a required percentage of its requirements from the dominant firm, but no discount if this requirement is not met.
- 3) Purchase growth discounts.
- 4) Liquidated damages far above the dominant firm’s actual costs of discontinuing service, which are paid if the customer switches to a competitor or fails to meet minimum quantity commitments.¹⁶

Dr. Pelcovits then added:

The important thing is that the customer be faced with the risk of a substantial (usually lump sum) penalty when dealing with a competitor to the dominant firm. The competitor then has to compensate the customer for this penalty (often the loss of a first-dollar discount or rebate.) The exclusion works, and is very

¹⁵ An example of such exclusionary actions can be found in the just-filed complaint by the Federal Trade Commission against Intel (FTC Docket No. 9341, filed Dec. 16, 2009, at ¶ 5), “Its monopoly threatened, Intel engaged in a number of unfair methods of competition and unfair practices to block or slow the adoption of competitive products and maintain its monopoly to the detriment of consumers.”

¹⁶ Declaration of Michael D. Pelcovits on Behalf of Worldcom Inc., *In the Matter of AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593 (filed Jan. 23, 2003) at 5. Exclusionary activities in ILEC special access term contracts also is discussed by Joseph Farrell in a filing in this proceeding (Reply Declaration of Joseph Farrell on Behalf of Comptel, *In the Matter of Speical Access Rates for Price Cap Local Exchange Crriers*, WC Docket No. 05-25, *AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593 (filed July 29, 2005)).

effective, because the required compensation is a real cost to the entrant of making a sale. For the dominant firm, the cost of the rebate or discount plan can be essentially zero.¹⁷

Many purchasers of special access circuits from ILECs, including XO, have alleged in the record in this proceeding that they have entered into agreements with terms and conditions identical or similar to those described by Dr. Pelcovits and which they believe to be exclusionary. The Commission, of course, can examine the accuracy of these claims on its own by obtaining from the ILECs their special access contracts to examine the terms and conditions to determine whether they are exclusionary.¹⁸ One potential analytical method to determine whether the terms and conditions are exclusionary is to examine agreements from different ILECs in different geographic markets in relation to the share of circuits held by alternative, competing vendors (normalized for buildings served by those vendors) in those markets. It should be noted that whether or not the terms and conditions are exclusionary will not depend on the revenue or number of circuits at stake. Rather, the Commission needs to determine whether these practices are profit maximizing only because they seek to preclude use of competitive firms.

IV. COLLECTION OF DATA AND CONFIDENTIALITY

In the previous section, XO set forth substantial new data needs for the Commission regarding the prices carriers pay to purchase special access circuits at wholesale and

¹⁷ *Id.*, at 7.

¹⁸ XO notes that the Commission addressed the issue of ILEC exclusionary practices several years ago when it accepted AT&T's "Merger Conditions" as part of its order approving the acquisition of BellSouth by AT&T. (*In the Matter of AT&T Inc. and BellSouth Corporation Application for Transfer of Control*, Memorandum Opinion and Order, WC Docket No. 06-74 (rel. Mar. 26, 2007). Among the conditions (Appendix F), AT&T/BellSouth committed "not to include any pricing flexibility contract or tariff filed with the Commission...access service ratio terms which limit the extent to which customers may obtain transmission services as UNEs, rather than special access services" and to offer contracts with "volume and/or term discount(s) without a MARC."

end users pay to purchase special access circuits at retail. XO also urges the Commission to seek data on the cost of these circuits from ILECs. To facilitate production of these data, the Commission should first request that sellers and purchasers of special access circuits voluntarily submit their data in the relevant geographic markets in a format determined by the Commission, subject to the confidentiality protections discussed below. Should the Commission not receive crucial data,¹⁹ XO believes it has the legal authority to compel production of the data pursuant to section 211 of the Communications Act.²⁰

The data XO asks the Commission to collect is rightly considered by firms to be proprietary and highly confidential, and it should be handled accordingly by the Commission. While sellers of special access circuits routinely disclose prices, facilities, and buildings served to each individual purchaser subject to non-disclosure agreements, purchasers rarely, if ever, disclose bids received or contract prices for specific routes. Such information is among the most competitively sensitive information that a firm possesses. Consequently, XO believes this “purchaser” information should be subject to special and more rigorous protections from the Commission to ensure it is not disclosed. XO therefore suggests to the Commission that it adopt the following new “highly sensitive” protective order to handle receipt of the price and cost data while permitting other parties to review the data:

- Price data received from sellers should only be disclosed to outside counsel and outside consultants who agree not to disclose and not make copies of the data;
- Cost data received from ILEC sellers should only be disclosed to outside counsel and outside consultants who agree not to disclose and not make copies of the data; and

¹⁹ XO recognizes that relevant data may be covered by non-disclosure agreements entered into between sellers and purchasers, which may prevent voluntary submission to the Commission. These agreements generally provide for disclosure should it be compelled by the government.

²⁰ 47 U.S.C. § 211.

- Price data received from purchasers shall be anonymized by the Commission so that the identity of the carrier supplying the data is not known directly to any other party or cannot be deduced by any other party,²¹ and only this anonymized data should only be disclosed to outside counsel and outside consultants who agree not to disclose and not make copies of the data.

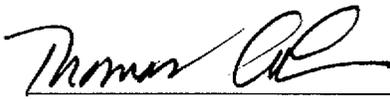
The foregoing restrictions shall apply to the raw data submitted by carriers. Aggregated data and the Commission's analysis of such data should not pose the same competitive concerns about the disclosure of confidential information and may be reviewed by any party, including those who have not signed the protective order.

V. CONCLUSION

As a purchaser of special access circuits, XO is familiar with the market power possessed by the ILECs. Rates far exceed those seen in competitive markets, and ILECs are able to impose exclusionary terms and conditions – all of which harms significantly the development of local competition and the provision of more robust and affordable broadband access. In these comments, XO has provided an analytical framework that would demonstrate conclusively these realities. It welcomes the opportunity to review in greater depth with the Commission the analysis it conducted in the Bell Mergers and discuss how to import that methodology into this docket.

²¹ XO notes that during the past year, as the Commission considered issuing additional data requests in this proceeding, numerous parties discussed the issue of data confidentiality with Commission staff and filed *ex partes* on the issue. *See, e.g.*, Letter of Thomas Jones, Counsel, tw telecom inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-25 (filed June 18, 2009); Letter of Christopher Wright, Counsel, Sprint, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-25 (filed June 22, 2009); Letter of Edward Black, President and CEO, CCIA, et al. to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-25 (filed June 3, 2009). Because the data XO suggests the Commission collect is highly sensitive, they urge the Commission to receive input from interested parties about methods that would ensure that the data is completely anonymized.

Respectfully submitted,

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