

# WILLKIE FARR & GALLAGHER<sub>LLP</sub>

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**REDACTED - FOR PUBLIC INSPECTION**

January 27, 2011

FILED/ACCEPTED

**VIA HAND DELIVERY**

JAN 27 2011

Federal Communications Commission  
Office of the Secretary

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *In the Matter of Special Access for Price Cap Local Exchange Carriers*, WC Dkt. No. 05-25, RM-10593**

Dear Ms. Dortch:

Pursuant to the *Second Protective Order* in the above-referenced proceeding,<sup>1</sup> please find enclosed for filing two copies of the redacted version of a response from BT Americas Inc. ("BT") to the Commission's *Special Access Data Request Public Notice* ("*Public Notice*").<sup>2</sup> The redacted version of the filing is also being emailed to Marvin Sacks of the Pricing Policy Division of the Wireline Competition Bureau.

Also pursuant to the *Protective Order*, one original of the confidential version of this filing is being filed with the Secretary's Office under separate cover today. Two copies of the confidential version will also be provided to Marvin Sacks of the Pricing Policy Division of the Wireline Competition Bureau under separate cover.

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<sup>1</sup> See *Matter of Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, WC Dkt. No. 05-25, RM-10593, DA 10-2419 (rel. Dec. 27, 2010) ("*Second Protective Order*").

<sup>2</sup> See *Data Requested in Special Access NPRM*, Public Notice, WC Docket 05-25, RM-10593, DA 10-2073 (rel. Oct. 28, 2010) ("*Public Notice*").

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BT is filing a submission in response to the *Public Notice*, included as Attachment A to this letter. **[BEGIN HIGHLY CONFIDENTIAL]**

**[END HIGHLY CONFIDENTIAL]** BT did not have any comment with respect to Question III.F. This submission is a full response to the Commission's voluntary data request.

Please do not hesitate to contact me if you have any questions or concerns about this submission.

Respectfully submitted,



Thomas Jones  
Jonathan Lechter

*Attorneys for BT Americas Inc.*

cc: Marvin Sacks

Enclosures

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# **ATTACHMENT A**

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**Responses of BT Americas Inc. to the Special Access Voluntary Data Request issued in WC  
Docket No. 05-25, RM-10593**

**Voluntary Data Request Question III.A.**

For each Listed Statistical Area, we request that all providers other than incumbent LECs (e.g., competitive LECs, out-of-region incumbent LECs, cable companies, fixed wireless, etc.) state whether their company has any connections that it owns or that it leases from another entity under an infeasible right of use (IRU) agreement.

**BT's Response:**

**[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]** connections as defined in the data request released on October 28, 2010, in WC Dkt. No. 05-25, RM-10593.

**Voluntary Data Request Question III.B.**

We request that all providers other than incumbent LECs (e.g., competitive LECs, out-of-region incumbent LECs, cable companies, fixed wireless, etc.) submit data to respond to the following questions:

1. For each location in each Listed Statistical Area to which your company provides a connection that you own or that you lease from another entity under an infeasible right of use (IRU) agreement, provide the following information below. Please use the template available at <http://www.fcc.gov/wcb/ppd/template.xls> for your response, using the data elements identified in Table III.B.1 of Attachment A, and consistent with that table's instructions.

**BT's Response:**

**[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]** connections as defined in the data request released on October 28, 2010, in WC Dkt. No. 05-25, RM-10593.

2. For each incumbent LEC wire center where your company is collocated in each Listed Statistical Area, provide the actual situs address, the geocode, and the CLLI code for the incumbent LEC wire center. Please use the template available at <http://www.fcc.gov/wcb/ppd/template.xls> for your response, following the instructions and using the data elements identified in Table III.B.2 of Attachment A.

**BT's Response:**

**[BEGIN HIGHLY CONFIDENTIAL]** **[END HIGHLY CONFIDENTIAL]**

**REDACTED - FOR PUBLIC INSPECTION**

3. For each Listed Statistical Area in which your company owns fiber or your company leases fiber from another entity under an IRU agreement, provide a map of the routes followed by fiber that constitute your network. Also, provide a map of the routes followed by fiber connecting your network to end-user locations. Please follow the instructions and use the data elements identified in Tables III.B.3(i) and III.B.3(ii) of Attachment A for your response.

**BT's Response:**

**[BEGIN HIGHLY CONFIDENTIAL]**

**[END HIGHLY CONFIDENTIAL]**

**Voluntary Data Request Question III.C.**

We request that all CMRS providers, for each cell site in each Listed Statistical Area, provide the information below. Please use the template available at <http://www.fcc.gov/wcb/ppd/template.xls> for your response, using the data elements identified in Table III.C. of Attachment A, and consistent with that table's instructions.

**BT's Response:**

BT is not a CMRS provider and therefore is unable to provide the requested information.

**Voluntary Data Request Question III.D.**

We request that all providers other than incumbent LECs (e.g., competitive LECs, out-of-region incumbent LECs, cable companies, fixed wireless, etc.) answer the following questions pursuant to the Instructions in Section II of this Public Notice:

1. Explain the business rule that you use to determine whether to build a channel termination to a particular location. Please enumerate all underlying assumptions.

**BT's Response:**

**[BEGIN HIGHLY CONFIDENTIAL]**

**[END HIGHLY**

**CONFIDENTIAL]**

2. Please describe reasons why even if your business rule suggests that it would make sense to build, you would not, e.g., inability to access building, issues with rights of way, inability to obtain capital, issues of timing.

**BT's Response:**

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See BT's response above to Question III.D.1. **[BEGIN HIGHLY CONFIDENTIAL]**

**[END HIGHLY CONFIDENTIAL]**

**Voluntary Data Request Question III.E**

We request that all incumbent LECs answer the following questions pursuant to the Instructions in Section II of this Public Notice:

**BT Response:**

BT is not an incumbent LEC.

**Voluntary Data Request Question III.F**

We seek comment from the public on the quality, utility and clarity of this data request.

**BT Response:**

BT does not have any comment on the quality, utility, and clarity of this data request.

**Contact Information**

- |  |  |
|--|--|
| 1. Name of Company Submitting Data   | BT Americas Inc.                               |
| 2. FRN of Company Submitting Data  | 0003708906                                     |
| 3. DBA Name of Company Submitting Data   | BT Americas Inc.                               |
| 4. Use the drop-down box to indicate whether this worksheet contains data for ILEC operations, non-ILEC operations, CMRS operations, a combination of all. | Non-ILEC Operations (incl. ILEC out-of-region) |
| 5. Contact person (person who prepared the data)   | A. Sheba Chacko                                |
| 6. Contact person telephone number and email address.  |  |
| Phone.   | 703 755 6730                                   |
| Email.   | sheba.chacko@bt.com                            |
| 7. Use the drop-down box to indicate whether this is an original or revised filing.  | Original Filing                                |