

Eric J. Branfman
Direct Phone: 202.373.6553
Direct Fax: 202.373.6001
eric.branfman@bingham.com

February 10, 2011

Via Electronic Mail

Gil M. Strobel, Esq.
Lawler, Metzger, Kenney & Logan, LLC
2001 K Street, N.W.
Suite 802
Washington, DC 20005

Re: In the Matter of Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593

Dear Mr. Strobel:

This letter responds to your February 2, 2011 request that 360networks (USA) inc. ("360networks") TDS Metrocom, LLC ("TDS") and U.S. TelePacific Corp. ("TelePacific) provide Sprint Nextel with access to all confidential and highly confidential documents that have been filed in the above referenced proceedings, including information filed in response to the Commission's Public Notice released on October 28, 2010.¹

With the exception of the responses to the special access data requests, none of the parties have previously filed any confidential or highly confidential materials in these proceedings. In accordance with the Commission's October 28, 2010 notice, "[t]he data collected under this public notice will not be made immediately available to the public to allow staff time to perform an initial review for completeness and responsiveness."² Therefore, 360networks, TDS and TelePacific will not presently disclose its highly confidential responses to the Public Notice. To the extent required under the *Protective Orders*,³ this letter serves as an objection to your February 2, 2011 request for production of 360networks, TDS and TelePacific's confidential and highly confidential responses.

¹ "Data Requested in *Special Access NPRM*," WC Docket No. 05-25; RM-I0593, Public Notice, DA 10-2073 (rel. Oct. 28, 2010).

² *Id.* at 2.

³ See *Modified Protective Order, Special Access Rates 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*, DA 10-2075 ¶ 7 (rel. Oct. 28, 2010); *Second Protective Order, Special Access Rates for Price Cap Local Exchange*

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com

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Please do not hesitate to contact me at (202) 373-6553 with questions.

Sincerely yours,

/s/ electronically signed

Eric J. Branfman
Counsel to 360networks (USA) inc., TDS Metrocom, LLC and U.S. TelePacific Corp.

Enclosure

cc: Marlene H. Dortch, Secretary, Federal Communications Commission (via ECFS)
Tamar E. Finn

Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, DA 10-2419, ¶ 12 (rel. Dec. 27, 2010) (collectively, the “Protective Orders”).