



Andrew D. Fisher
Senior Counsel

One Comcast Center
50th Floor
Philadelphia, PA 19103
215-286-3039

February 9, 2011

REDACTED – FOR PUBLIC INSPECTION

FILED/ACCEPTED

Via Hand Delivery

FEB - 9 2011

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

Federal Communications Commission
Office of the Secretary

Re: *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 – WC Docket No. 05-25; RM-10593*

Dear Ms. Dortch:

By this letter, Comcast Business Communications, LLC (“Comcast”), re-submits its response to the Public Notice released by the Federal Communications Commission (“FCC”) requesting the voluntary submission of data in the above-referenced proceeding.¹ The data submitted is in narrative form in full response to Question III.D. This filing replaces the response to Question III.D that Comcast filed on January 27, 2011. The only change from the original filing is that portions of the public version of Comcast’s response are now unredacted, and both the public and highly confidential versions of the document have been revised to indicate where the highly confidential material has been redacted.

If you have any questions, please contact the undersigned.

Sincerely,

Andrew D. Fisher
Senior Counsel

Attachment

cc: Marvin Sacks

¹ FCC, “Data Requested in *Special Access NPRM*,” WC Docket No. 05-25, RM-10593, Public Notice, DA 10-2073 (rel. Oct. 28, 2010).

REDACTED – FOR PUBLIC INSPECTION

Response of Comcast Business Communications, LLC (“Comcast”), to Question III.D. of the Public Notice Seeking Additional Data Related to Special Access¹

Comcast has recently begun to focus greater attention on the provision of high-bandwidth data services to medium-sized and enterprise business customers as well as carrier customers. The services that generally fall into the same category as incumbent local exchange carrier (“LEC”) “special access” services include Metro-Ethernet (Metro-E) point-to-point and multi-point services, as well as cellular backhaul services. These services are provided over Comcast’s state-of-the-art broadband network.

[Begin highly confidential] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **[End highly confidential]** Comcast must consider multiple additional economic and other factors in determining whether to construct high-speed last-mile facilities to reach a special access customer in a specific geographic area within its footprint. **[Begin highly confidential]** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹FCC, “Data Requested in *Special Access NPRM*,” WC Docket No. 05-25, RM-10593, Public Notice, DA 10-2073 (rel. Oct. 28, 2010) (“Public Notice”).

² Consistent with the Public Notice, Comcast uses the term “location” to refer to a “building, or other free-standing site, cell site on a building, or free-standing cell site.” Public Notice at 3.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **[End highly confidential]** Comcast

may encounter difficulties in gaining access to the commercial location on reasonable terms. In addition, in areas where cable must be buried, Comcast must take into account topographical conditions and the much higher construction costs (as compared with aerial cable) and whether the municipality has imposed a moratorium prohibiting excavation across or along public thoroughfares.

[Begin highly confidential] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **[End**

highly confidential]

REDACTED – FOR PUBLIC INSPECTION