Comcast

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DOCKET FILE COPY ORIGINAL

February 9, 2011

REDACTED – FOR PUBLIC INSPECTION

FILED/ACCEPTED

FEB - 9 2011

Federal Communications Commission
Office of the Secretary

Via Hand Delivery

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

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"), pursuant to the Second Protective Order in the above-referenced proceeding,[1] re-submits two redacted copies of its response to Question III.D of the Public Notice released by the Federal Communications Commission ("FCC") requesting the voluntary submission of data related to special access.[2]

This submission 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 the document has been revised to indicate where highly confidential material remains redacted. The redacted portions of Comcast's response are highly confidential as described in paragraph 6 of the Second Protective Order. Pursuant to the Second Protective Order, the unredacted version of this filing is being submitted to the Secretary's Office under seal, and two unredacted copies are also being hand delivered to Marvin Sacks, Pricing Policy Division, Wireline Competition Bureau, FCC.

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1 *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, Second Protective Order, DA 10-2419 (rel. Dec. 27, 2010) ("Second Protective Order").

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

If you have any questions, please contact the undersigned.

Sincerely,

Andrew D. Fisher /sel

Andrew D. Fisher
Senior Counsel

Attachment

cc: Marvin Sacks

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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 /rch

Andrew D. Fisher
Senior Counsel

Attachment
cc: Marvin Sacks

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

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Response of Comcast Business Communications, LLC ("Comcast"), to Question III.D. of the Public Notice Seeking Additional Data Related to Special Access[1]

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] **[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]

[1]FCC, "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] **[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] **[End highly confidential]**

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