

BINGHAM

REDACTED - FOR PUBLIC INSPECTION;  
WC DOCKET NO. 05-25, RM 10593  
Before the Federal Communications Commission

Joshua M. Bobeck  
Direct Phone: 202.373.6010  
Direct Fax: 202.373.6414  
josh.bobek@bingham.com

FILED/ACCEPTED

February 17, 2011

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**Via Hand Delivery**

Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-5-A325  
Washington, DC 20554

**Re: In the Matter of Special Access Rates for Price Cap Local Exchange Carriers, 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**

Dear Secretary Dortch,

On behalf of MegaPath, Inc. and Covad Communications Company ("Covad"), FRN 0003-7537-53, enclosed for filing are two (2) copies of the redacted version of Covad's Responses to the Commission's data requested in Special Access NPRM Public Notice ("Special Access Public Notice")<sup>1</sup>. Included with this transmittal are data specifications (submitted in electronic format on CD) in response to Questions III.B.1 (Connections by Location) and III.B.2 (Collocations by Wire Center), and narratives in response to Questions III.A. and III.D, attached hereto. The data specifications and narrative responses are a full response to the data requested.

With respect to the redacted version of Questions III.B.1 and III.B.2, Covad has designated all of the information as Highly Confidential, therefore the redacted version only contains Covad's contact information.

In accordance with the Second Protective Order issued in this proceeding, this filing is marked "REDACTED - FOR PUBLIC INSPECTION."

Please date-stamp and return the enclosed extra copy of this transmittal. Any questions relating to the enclosed materials, should be directed to Anthony Hansel of MegaPath at (202) 220-0410.

Sincerely,



Joshua M. Bobeck

<sup>1</sup> "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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2020 K Street NW  
Washington, DC  
20006-1806

T +1.202.373.6000  
F +1.202.373.6001  
bingham.com

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RM 10593, Before the Federal Communications Commission**

**MegaPath, Inc. and Covad Communications Company (“Covad”)  
FRN 0003-7537-53**

**Responses to:**

**SPECIAL ACCESS NPRM DATA REQUEST QUESTION III.A.**

For each Listed Statistical Area, state whether the company has any connections that it owns, or leases from another entity under an IRU agreement.

**Response:**

**[BEGIN CONFIDENTIAL]**

**[END CONFIDENTIAL]**

**SPECIAL ACCESS NPRM DATA REQUEST QUESTION III.D.**

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

**Response to 1:**

**[BEGIN CONFIDENTIAL]**

**[END CONFIDENTIAL]**

2. Describe reasons why, even if the business rule would suggest it makes sense to build, you would not, e.g. inability to access building, issues with rights of way, inability to obtain capital, issues of timing.

**Response to 2.**

See Response to Question 1.

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**MegaPath, Inc. and Covad Communications Company (“Covad”)  
FRN 0003-7537-53**

**Responses to:**

**SPECIAL ACCESS NPRM DATA REQUEST QUESTION III.A.**

For each Listed Statistical Area, state whether the company has any connections that it owns, or leases from another entity under an IRU agreement.

**Response:**

**[BEGIN CONFIDENTIAL]**

**[END CONFIDENTIAL]**

**SPECIAL ACCESS NPRM DATA REQUEST QUESTION III.D.**

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

**Response to 1:**

**[BEGIN CONFIDENTIAL]**

**[END CONFIDENTIAL]**

2. Describe reasons why, even if the business rule would suggest it makes sense to build, you would not, e.g. inability to access building, issues with rights of way, inability to obtain capital, issues of timing.

**Response to 2.**

See Response to Question 1.

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DOCKET NO. 05-25

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