

REDACTED – FOR PUBLIC INSPECTION

January 11, 2012

VIA ECFS

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 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:

On December 6, December 16, and December 30, 2011, tw telecom inc. (“tw telecom”) filed information in response to the FCC’s September 19, 2011 *Public Notice*¹ inviting voluntary submissions of information regarding special access services. These filings contained data responsive to Questions III.C.4 – 5 and III.D.1 – 4, all of which is highly confidential. Pursuant to a request by the Wireline Competition Bureau staff, tw telecom hereby files for public inspection the cover letters that tw telecom filed with its three data submissions. tw telecom additionally plans to file information responsive to Questions III.D.5 – 13 at a later date.

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

Respectfully submitted,

/s/ Don Shephard
Don Shephard
Vice President, Federal Regulatory Affairs
228 Blanchard Road
Braintree, VT 05060

CC via email: Andrew Mulitz

¹ *Competition Data Requested in Special Access NPRM*, Public Notice, DA 11-1576 (rel. Sept. 19, 2011) (“*Public Notice*”).

HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER
IN WC DOCKET NO. 05-25, RM-10593, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

December 6, 2011

VIA FED EX

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

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Federal Communications Commission
Office of the Secretary

Re: *In the Matter of 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:

Pursuant to the *Modified Protective Order*¹ and *Second Protective Order*² in the above-referenced proceedings, please find enclosed a flash drive containing highly confidential electronic data, which constitutes a partial response of **tw telecom holdings inc.** (“**tw telecom**”) to the Commission’s September 19, 2011 *Public Notice*³ inviting voluntary submissions of information regarding special access services. Due to unanticipated delays in transmitting the enclosed information, **tw telecom** is filing this portion of its response to the data request one day after the date set forth in the *Public Notice*. This filing contains data from 2010; **tw telecom** is currently compiling similar data from 2008 and 2009, which it will file at a later date. **tw telecom** will also file information responsive to Questions III.D.5 – 13 at a later date. The data contained herein is responsive to:

- Question III.C.4., which requests revenue data related to **tw telecom**’s sale of DS1 and DS3 services;
- Question III.C.5., which requests revenue data related to **tw telecom**’s sale of PSDS services;

¹ *In the Matter of Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, 25 FCC Rcd. 15168 (2010) (“*Modified Protective Order*”).

² *In the Matter of Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd. 17725 (2010) (“*Second Protective Order*”).

³ *Competition Data Requested in Special Access NPRM*, Public Notice, DA 11-1576 (rel. Sept. 19, 2011) (“*Public Notice*”).

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IN WC DOCKET NO. 05-25, RM-10593, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

- Question III.D.1., which requests pricing data related to **tw telecom**'s purchase of DS1s, DS3s, and PSDS circuits;
- Question III.D.2., which requests data related to any adjustments or true-ups to billed DS1 and DS3 rate elements;
- Question III.D.3., which requests data related to **tw telecom**'s purchase of DS1, DS3, and PSDS circuits from ILECs;
- Question III.D.4., which requests data related to **tw telecom**'s expenditures on ILEC DS1, DS3, and PSDS services. The Excel template provided by the Commission for this Question did not include rows for data requested in III.D.4.e. **tw telecom** has inserted the appropriate rows in its response to this Question.

All data contained herein is highly confidential and subject to the *Second Protective Order* as it contains highly detailed customer and geographic information regarding (1) the locations that **tw telecom** serves with last-mile facilities and the nature of those facilities; (2) the extent to which **tw telecom** relies on incumbent LEC and non-incumbent LEC last-mile facilities and local transport facilities to provide special access-like services and the nature of those inputs; (3) the rates or charges associated with channel terminations or transport facilities, and information from which such rates or charges could be inferred;⁴ and (4) the circuit identifiers, tariff or contract identifiers, or other information associating channel terminations or transport facilities with a particular tariff or contract.⁵

Pursuant to the *Modified Protective Order*, *Second Protective Order* and *Public Notice*, two copies of this filing are also being delivered to Andrew Mulitz of the Pricing Policy Division of the Wireline Competition Bureau.

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

Respectfully submitted,

/s/ Don Shephard

Don Shephard
Vice President, Federal Regulatory Affairs
228 Blanchard Road
Braintree, VT 05060

CC: Andrew Mulitz

⁴ See *Special Access for Price Cap Local Exchange Carriers*, Letter from Sharon E. Gillett, Chief, Wireline Competition Bureau, to Paul Margie, Wiltshire & Grannis LLP, 26 FCC Rcd. 6571 (2011) (supplementing the Second Protective Order).

⁵ See *id.*

HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE
ORDER IN WC DOCKET NO. 05-25, RM-10593, BEFORE THE FEDERAL
COMMUNICATIONS COMMISSION
FILED/ACCEPTED

December 16, 2011

DEC 16 2011

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VIA COURIER

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 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:

Pursuant to the *Modified Protective Order*¹ and *Second Protective Order*² in the above-referenced proceedings, please find enclosed a flash drive containing highly confidential electronic data, which constitutes the second partial response of **tw telecom holdings inc.** (“**tw telecom**”) to the Commission’s September 19, 2011 *Public Notice*³ inviting voluntary submissions of information regarding special access services. This filing contains data from 2009; **tw telecom** previously filed data from 2010 and is currently compiling similar data from 2008, which it will file at a later date. **tw telecom** will also file information responsive to Questions III.D.5 – 13 at a later date. The data contained herein is responsive to:

- Question III.C.4., which requests revenue data related to **tw telecom**’s sale of DS1 and DS3 services;
- Question III.C.5., which requests revenue data related to **tw telecom**’s sale of PSDS services;
- Question III.D.1., which requests pricing data related to **tw telecom**’s purchase of DS1s, DS3s, and PSDS circuits;

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ORDER IN WC DOCKET NO. 05-25, RM-10593, BEFORE THE FEDERAL
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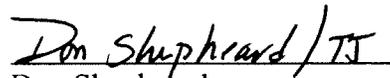
- Question III.D.2., which requests data related to any adjustments or true-ups to billed DS1 and DS3 rate elements;
- Question III.D.3., which requests data related to **tw telecom**'s purchase of DS1, DS3, and PSDS circuits from ILECs;
- Question III.D.4., which requests data related to **tw telecom**'s expenditures on ILEC DS1, DS3, and PSDS services. The Excel template provided by the Commission for this Question did not include rows for data requested in III.D.4.e. **tw telecom** has inserted the appropriate rows in its response to this Question.

All data contained herein is highly confidential and subject to the *Second Protective Order* as it contains highly detailed customer and geographic information regarding (1) the locations that **tw telecom** serves with last-mile facilities and the nature of those facilities; (2) the extent to which **tw telecom** relies on incumbent LEC and non-incumbent LEC last-mile facilities and local transport facilities to provide special access-like services and the nature of those inputs; (3) the rates or charges associated with channel terminations or transport facilities, and information from which such rates or charges could be inferred;⁴ and (4) the circuit identifiers, tariff or contract identifiers, or other information associating channel terminations or transport facilities with a particular tariff or contract.⁵

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Respectfully submitted,



Don Shephard
Vice President, Federal Regulatory Affairs
228 Blanchard Road
Braintree, VT 05060

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HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 05-25, RM-10593, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

December 30, 2011

VIA COURIER

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

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DEC 30 2011
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Federal Communications Commission
Office of the Secretary

Re: *In the Matter of 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:

Pursuant to the *Modified Protective Order*¹ and *Second Protective Order*² in the above-referenced proceedings, please find enclosed a flash drive containing highly confidential electronic data, which constitutes the third partial response of **tw telecom holdings inc.** (“**tw telecom**”) to the Commission’s September 19, 2011 *Public Notice*³ inviting voluntary submissions of information regarding special access services. This filing contains data from 2010; **tw telecom** previously filed data from 2008 and 2009. **tw telecom** plans to file information responsive to Questions III.D.5 – 13 at a later date. The data contained herein is responsive to:

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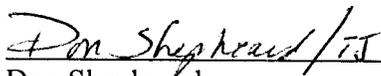
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