



Grace E. Koh
Policy Counsel
Public Policy Office

November 8, 2012

VIA ECFS

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

Re: Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25

Dear Ms. Dortch:

On November 6, 2012, I forwarded the attached *ex parte* letter, dated November 1, 2012, to Michael Steffen, legal advisor to Chairman Genachowski; Christine Kurth, legal advisor to Commissioner McDowell; Angela Kronenberg, legal advisor to Commissioner Clyburn; Priscilla Argeris, legal advisor to Commissioner Rosenworcel; and Nicholas Degani, legal advisor to Commissioner Pai. The letter describes an October 26, 2012, teleconference between Cox Communications, Inc. ("Cox") and the Wireline Competition Bureau, during which we discussed the pending data request on special access services. As reflected in the letter, Cox shares the concerns of other members of the cable industry regarding the potential scope of the data request and the business risk posed by submitting such highly confidential data.¹

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed with your office via ECFS. Courtesy copies will be distributed to the legal advisors via email.

Respectfully submitted,

_____/s/_____

Grace Koh
Policy Counsel
Cox Enterprises, Inc.

Attachment

cc: Michael Steffen
Christine Kurth
Angela Kronenberg
Priscilla Argeris
Nicholas Degani

¹ See, e.g., Letter from Mary McManus, Comcast Corp., to Marlene H. Dortch, FCC Secretary, WC Docket No. 05-25, (Nov. 5, 2012); Letter from Daniel L. Brenner, Hogan Lovells US LLP, Counsel for Bright House Networks, to Marlene H. Dortch, FCC Secretary, WC Docket No. 05-25 (Oct. 25, 2012); Letter from Steven F. Morris and Jennifer K. McKee, National Cable & Telecommunications Association, to Marlene H. Dortch, FCC Secretary, WC Docket No. 05-25 (Oct. 24, 2012).



Grace E. Koh
Policy Counsel
Public Policy Office

November 1, 2012

VIA ECFS

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

Re: Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25

Dear Ms. Dortch:

On October 26, Jose Jimenez, Jeremy Bye, and the undersigned, on behalf of Cox Communications, Inc. ("Cox"), met by teleconference with William Layton, Eric Ralph, Ken Lynch, and Elizabeth McIntyre of the Wireline Competition Bureau.

The purpose of our meeting was to discuss Cox's ability to respond to requests for information on certain facilities that would be covered in the pending data request in the docket captioned above. Specifically, Bureau staff asked about our ability to provide Cox's facility locations by latitude and longitude as of December 31, 2010 and December 31, 2012, as well as a number of other details, where Cox provisions at least 1.5 Mbps of dedicated service. The Bureau staff also asked whether it would be possible to provide billing data for the same services. Staff noted that the data would be submitted under the second-level Protective Order in the docket captioned above.

We explained that the requested data would require significant manual efforts to obtain, verify, and collate. Cox does not maintain a single centralized source for the information requested. For example, much of Cox's coaxial cable assets are inventoried and tracked in one database, while fiber assets are tracked in another. Nor does Cox maintain locations of served buildings in longitude/latitude formats, and it would likely impose some additional cost to convert street addresses to the desired format across Cox's multiple databases.

With regard to pricing information, we explained that such information was highly confidential and very difficult for Cox to capture, particularly the 2010 information, given the changes in our system structure. To the extent possible, we urged Bureau staff to narrow the request, possibly to areas that were deemed uncompetitive based on some proxy, such as market share.

Ms. Marlene Dortch

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November 1, 2011

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed with your office via ECFS. Courtesy copies also are being distributed to the meeting attendees via email.

Respectfully submitted,

_____/s/_____

Grace Koh
Policy Counsel
Cox Enterprises, Inc.

cc: William Layton
Eric Ralph
Ken Lynch
Elizabeth McIntyre

Your submission has been accepted

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Proceeding

Name	Subject
05-25	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..

Contact Info

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Details

exparte: YES
Small Business Impact: NO
Type of Filing: NOTICE OF EXPARTE

Document(s)

File Name	Custom Description	Size
2012-10-25 ex parte v2.pdf		236 KB

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