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April 25, 2016

*Via Electronic Filing*

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

Re: *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rules for Interstate Special Access Services – WC Docket No. 05-25; RM-10593*

Dear Ms. Dortch:

Pursuant to the Modified Protective Order, the Second Protective Order, and the Data Collection Protective Order adopted in the above-referenced proceeding,<sup>1</sup> the attached Acknowledgments of Confidentiality are being submitted for inclusion in the record and served on counsel for Submitting Parties as indicated on the attached Certificate of Service pursuant to the Modified Protective Order and Second Protective Order.

The attached Acknowledgments have been signed by one additional attorney with Lawler, Metzger, Keeney & Logan, LLC (“Lawler Metzger”), Outside Counsel of Record to Sprint Corporation (“Sprint”): John W. Castle, who has not previously

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, 25 FCC Rcd 15168 (2010) (DA 10-2075) (“Modified Protective Order”); Second Protective Order, 25 FCC Rcd 17725 (2010) (DA 10-2419) (“Second Protective Order”); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) (DA 14-1424) (“Data Collection Protective Order”); *see also* Public Notice, WC Docket No. 05-25, *Wireline Competition Bureau Now Receiving Acknowledgments of Confidentiality Pursuant to Special Access Data Collection Protective Order*, DA 15-736 (rel. June 24, 2015)..

submitted Acknowledgments of Confidentiality in this proceeding. Mr. Castle is not involved in “competitive decision-making activities” as defined in the Protective Orders.<sup>2</sup>

By copy of this letter, the undersigned hereby requests that Mr. Castle be permitted to access the confidential and/or highly confidential versions of all documents that have been filed in the above-referenced proceeding, or that may be filed in the future. The undersigned is not requesting that copies of any previously-filed documents be provided at this time. Should Lawler Metzger request copies of confidential and/or highly confidential information filed by any parties in the future, the undersigned will coordinate with Submitting Parties at that time.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Emily J. H. Daniels  
Emily J. H. Daniels

Attachments

cc: SpecialAccess@fcc.gov  
Attached Service List

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<sup>2</sup> Modified Protective Order ¶ 4; Second Protective Order ¶ 5; Data Collection Order ¶¶ 13, 23, and Appendix A, ¶ 1.

## Certificate of Service

I hereby certify that on this 25th day of April, 2016, I caused true and correct copies of the foregoing letter and attached Acknowledgments of Confidentiality to be served as follows:

Via electronic mail to:

Marvin Sacks  
Pricing Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
Marvin.Sacks@fcc.gov

Via U.S. mail to:

Evan T. Leo  
Kellogg, Huber, Hansen, Todd, Evans &  
Figel, P.L.L.C.  
1615 M Street NW, Suite 400  
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*Counsel to Verizon and Verizon Wireless*

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*Counsel to AT&T Inc. and CenturyLink*

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*Counsel to Cox Communications, Inc.*

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INCOMPAS, Integra Telecom, Inc., and  
Level 3 Communications, LLC*

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Comcast Business Communications, LLC  
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Philadelphia, PA 19103

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Washington, DC 20006  
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Matthew A. Brill  
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*Counsel for Time Warner Cable and  
Comcast Corporation*

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1919 M Street NW, 8<sup>th</sup> Floor  
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Russel P. Hasner  
Wilkinson Barker Knauer, LLP  
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Washington, DC 20036  
*Counsel to Frontier Communications Corporation*

Grant B. Spellmeyer  
U.S. Cellular  
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Washington, DC 20001

Thomas W. Cohen  
Kelley Drye & Warren LLP  
3050 K Street NW, Suite 400  
Washington, DC 20007  
*Counsel to XO Communications, LLC*

Tamar E. Finn  
Eric J. Branfman  
Morgan, Lewis & Bockius LLP  
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Washington, DC 20006  
*Counsel to U.S. TelePacific Corp., TDS Metrocom, LLC, and The Wholesale Voice Line Coalition*

Peter M. Connolly  
Holland & Knight  
800 17<sup>th</sup> Street NW  
Washington, DC 20006  
*Counsel to United States Cellular Corp.*

/s/ Ruth E. Holder  
Ruth E. Holder

## APPENDIX A

## Acknowledgment of Confidentiality

WC Docket No. 05-25, RM 10593

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceedings, and I understand it. I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or consultant to a party or other person described in paragraph 4 of the foregoing Protective Order and that I will not use such information in any other capacity, nor will I disclose such information except as specifically provided in the Protective Order.

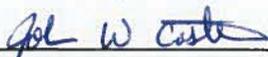
I hereby certify that I am not involved in "competitive decision-making" as that term is used in the definition of In-House Counsel in paragraph 4 of the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Confidential Documents and Confidential Information are used only as provided in the Protective Order; and (2) Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents or Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed at Washington, DC this 25 day of April, 2016.

  
\_\_\_\_\_  
John W. Castle  
Associate  
Lawler, Metzger, Keeney & Logan, LLC  
1717 K Street NW, Suite 1075  
Washington, DC 20006  
202-777-7700

## APPENDIX A

## Acknowledgment of Confidentiality

WC Docket No. 05-25, RM-10593

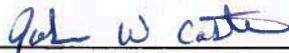
I hereby acknowledge that I have received and read a copy of the foregoing Second Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Second Protective Order and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Second Protective Order. I acknowledge that a violation of the Second Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any information obtained as a result of the Second Protective Order is due solely to my capacity as Outside Counsel or Outside Counsel of Record or Outside Consultant to a party or other person described in paragraph 9 of the foregoing Second Protective Order and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Second Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Second Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Second Protective Order, and I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Second Protective Order.

Executed at Washington, DC, this 25 day of April, 2016.



\_\_\_\_\_  
John W. Castle  
Associate  
Lawler, Metzger, Keeney & Logan, LLC  
1717 K Street NW, Suite 1075  
Washington, DC 20006  
202-777-7700

## APPENDIX C

## Acknowledgment of Confidentiality

WC Docket No. 05-25; RM-10593

I am seeking access to [ ] only Confidential Information or [X] Confidential and Highly Confidential Information.

I hereby acknowledge that I have received and read a copy of the foregoing Data Collection Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Data Collection Protective Order and that I shall not disclose or use Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, or Highly Confidential Information except as allowed by the Data Collection Protective Order.

I acknowledge that a violation of the Data Collection Protective Order is a violation of an order of the Federal Communications Commission (Commission). I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Data Collection Protective Order, including but not limited to suspension or disbarment of Counsel or Outside Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential or Highly Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Data Collection Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential or Highly Confidential Information in a manner not authorized by this Data Collection Protective Order.

I certify that I am not involved in Competitive Decision-Making.

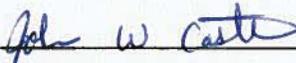
Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Data Collection Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as a person described in paragraph 9 of the Data Collection Protective Order and agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents and Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Data Collection Protective Order and to ensure that there is no disclosure of Stamped Confidential Documents, Stamped Highly Confidential Documents, Confidential Information, and Highly Confidential Information in my possession or in the possession of those who work for me, except as provided in the Data Collection Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Confidential Information and Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Data Collection Protective Order.

Executed this 25 day of April, 2016.

  
\_\_\_\_\_  
John W. Castle  
Associate  
Lawler, Metzger, Keeney & Logan, LLC  
1717 K St. NW, Suite 1075  
Washington, DC 20006  
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