



Michael H. Pryor
+1 202 776 2339
mpryor@cooley.com

Via ECFS

May 16, 2016

Ms. 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 Dkt. No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593; Business Data Service Data Collection Protective Order, WC Docket 15-247***

Dear Ms. Dortch:

Pursuant to the procedures outlined in the *Modified Protective Order*,¹ *Second Protective Order*,² *Data Collection Protective Order*,³ and *Tariff Investigation Protective Order*,⁴ I hereby submit the attached Acknowledgments of Confidentiality executed by J.G. Harrington on behalf of the National Cable and Telecommunications Association ("NCTA") for purposes of reviewing confidential and highly confidential information filed in the above referenced proceedings, including information and data submitted in response to the Commission's special access data collection.

Pursuant to the *Modified Protective Order* and the *Second Protective Order*, this filing has been served on Submitting Parties and a certificate of service is attached.

¹ *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Modified Protective Order, 25 FCC Rcd. 15168 (2010) ("*Modified Protective Order*").

² *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Second Protective Order, 25 FCC Rcd. 17725 (2010) ("*Second Protective Order*").

³ *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Order and Data Collection Protective Order, 29 FCC Rcd. 11657 (2014) ("*Data Collection Protective Order*"); see also *Wireline Competition Bureau Now Receiving Acknowledgments of Confidentiality Pursuant to Special Access Data Collection Protective Order*, Public Notice, 30 FCC Rcd. 6421 (2015).

⁴ *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, 30 FCC Rcd 13680 (Dec. 4, 2015) ("*Tariff Investigation Protective Order*").

Cooley

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Please contact me at 202-776-2339 if you have any questions.

Respectfully submitted,

/s/ Michael H. Pryor

Attachments

cc: SpecialAccess@fcc.gov
Christopher Koves

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 Alexandria, Virginia this 15th day of May 2016



[Name] J. G. Harrington
[Position] Attorney
[Address] Cooley, LLP, 1299 Pennsylvania Ave., N.W. #700
[Telephone] Washington, DC 20004
(202) 776-2818

APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 05-25, RM-10593

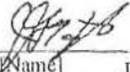
I hereby acknowledge that I have received and read a copy of the foregoing Second Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Second Protective Order and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential 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 Alexandria, Virginia this 15th day of May, 2016.



[Name] J. G. Harrington
[Position] Attorney
[Address] Cooley, LLP, 1299 Pennsylvania Ave., N.W. #700
[Telephone] Washington, DC 20004
(202) 776-2818

APPENDIX C

Acknowledgment of Confidentiality

WC Docket No. 05-25; RM-10593

I am seeking access to only Confidential Information or 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 15th day of May, 2016.



[Name]	J. G. Harrington
[Position]	Attorney
[Firm]	Cooley, LLP, 1299 Pennsylvania Ave., N.W. #700
[Telephone]	Washington, DC 20004 (202) 776-2818

APPENDIX B
Attachment 2Tariff Investigation Protective Order
Acknowledgment of Confidentiality
WC Docket No. 15-247

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

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

I agree that I am bound by the Tariff Investigation 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 Tariff Investigation Protective Order.

I acknowledge that a violation of the Tariff Investigation 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 Tariff Investigation Protective Order, including but not limited to suspension or disbarment of Counsel or 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 Tariff Investigation 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 Tariff Investigation Protective Order.

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

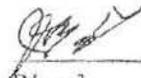
Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Tariff Investigation Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as an employee of Counsel, Outside Consultant, or Outside Firm, and I 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 Tariff Investigation Protective Order and to ensure that there is no disclosure of Confidential Information or Highly Confidential Information in my possession, in the possession of those who work for me or in the possession of other Support Personnel, except as provided in the Tariff Investigation 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 Tariff Investigation Protective Order.

Executed this 15th day of May, 2016.



[Name] J. G. Harrington
[Position] Attorney
[Firm] Cooley, LLP, 1299 Pennsylvania Ave., N.W. #700
[Telephone] Washington, DC 20004
[Party] (202) 776-2818
NCTA

APPENDIX A
Attachment I

Business Data Services Data Collection Protective Order
Acknowledgment of Confidentiality
WC Docket No. 15-247

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

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

I agree that I am bound by the Business Data Services 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 Business Data Services Data Collection Protective Order.

I acknowledge that a violation of the Business Data Services 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 Business Data Services 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 Business Data Services 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 Business Data Services Data Collection Protective Order.

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

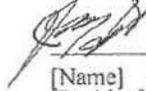
Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Business Data Services 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 6 of the Business Data Services 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 Business Data Services 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 Business Data Services 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 Business Data Services Data Collection Protective Order.

Executed this 15th day of May, 2016.



[Name] J. G. Harrington
[Position] Attorney
[Firm] Cooley, LLP, 1299 Pennsylvania Ave., N.W. #700, Washington, DC 20004
[Name of Client(s) Representing] NCTA
[Telephone] (202) 776-2818

CERTIFICATE OF SERVICE

I, Rayya Khalaf, do hereby certify that on this 16th day of May, 2016, I caused a copy of the foregoing letter and Acknowledgments of Confidentiality to be served by postage pre-paid mail, unless otherwise noted, on the following:

Marvin Sacks
Pricing Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W., Room 5-A225
Washington, DC 20554
Email: marvin.sacks@fcc.gov
(Via Email)

Thomas Jones
Jonathan Lechter
Matthew Jones
Willkie Farr & Gallagher
1875 K. Street, N.W.
Washington DC 20006
Email: tjones@wilkie.com
**Outside Counsel for BT Americas, Inc.,
Cheyond, Inc., Integra Telecom, Inc., EarthLink,
and tw telecom inc.**
(via Email)

Thomas Cohen
John J. Heitmann
Randall W. Sifers
Kelley Drye & Warren LLP
3050 K Street, N.W. Suite 400
Washington, DC 20007
Email: tcohen@kelleydrye.com
**Outside Counsel for Covad Communications
Group, Inc. and XO Communications, LLC**
(Via Email)

Andrew Fisher
Comcast Corporation
One Comcast Center – 50th Floor
Philadelphia, PA 19103
Email:
andrew_fisher@comcast.com
**Inside Counsel – Comcast
Corporation**
(Via Email)

Mark Davis
Paul Margie
Wiltshire & Grannis LLP
1200 18th Street, N.W., Suite 1200
Washington, DC 20036
Email:
mdavis@wiltshiregrannis.com
**Counsel to Sprint Nextel
Corporation**
(Via Email)

Eric J. Branfman
Russell M. Blau
Tamar E. Finn
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006
Email:
eric.branfman@bingham.com
**Outside Counsel for Level 3
Communications, LLC, TDS
Metrocom, LLC, MegaPath
Corporation, TelePacific
Communications, and 360
Networks**
(Via Email)

Jarrett S. Taubman
Latham & Watkins LLP
555 Eleventh Street, N.W. Suite 1000
Washington, DC 20004
Email: jarrett.taubman@lw.com
**Outside Counsel for Time
Warner Cable
(Via Email)**

Jonathan E. Nuechterlein
Marc A. Korman
Sidley Austin LLP
1501 K. Street, N.W.
Washington, DC 20005
Email:
jnuechterlein@sidley.com
**Outside Counsel for
AT&T
(Via Email)**

Grant B. Spellmeyer
U.S. Cellular
8410 W. Bryn Mawr Avenue
Chicago, IL 60631
Email: grant.spellmeyer@uscellular.com
**Counsel for U.S. Cellular
(Via Email)**

Suzanne K. Toller
Davis Wright Tremaine LLP
505 Montgomery Street
San Francisco, CA 94111
Email: suzannetoller@dwt.com
**Outside Counsel for T-Mobile USA, Inc.
(Via Email)**

Joseph Kahl
RCN Telecom Services, LLC
650 College Road East
Suite 3100
Princeton, NJ 08540
Email: joseph.kahl@rcn.net
**Sr. Director, Regulatory and
External
Affairs
(Via Email)**

Michael J. Mooney
Level 3 Communications, LLC
1025 Eldorado Blvd. Broomfield,
CO 80021
Email:
michael.mooney@level3.com
**General Counsel, Regulatory
Policy
(Via Email)**

Traci Tidmore
EarthLink Business
7037 Old Madison Pike
Huntsville, AL 35806
Email:
traci.tidmore@corp.earthlink.com
**Regulatory Counsel for EarthLink
Business**

Colleen Boothby
Levine, Blaszak, Block & Boothby,
LLP
2001 L
Street,
N.W.
Suite
900
Washington, DC 20036
Email: cboothby@lb3law.com
**Counsel for Ad Hoc
Telecommunications
Users Committee
(Via Email)**

Evan T. Leo
Kellogg, Huber, Hansen, Todd, Evans & Figel,
P.L.L.C.
1615 M Street, N.W. Suite
400
Washington, DC 20036
Email: eleo@khhte.com
**Outside Counsel for Verizon and
Verizon Wireless
(Via Email)**

Karen Brinkmann
Karen Brinkmann, PLLC
555 11th Street, N.W.
Mail Station 07
Washington, DC 20004
Email: kb@karenbrinkmann.com
**Outside Counsel for FairPoint
Communications, Inc.
(Via Email)**

Russell P. Hanser
Wilkinson Barker Knauer L.P.
1800 M Street, NW
Suite 800N
Washington, DC 20036
Email: rhanser@wbklaw.com
**Outside Counsel for Century Link, Inc.
(Via Email)**

Emily Daniels
Richard D. Mallen
Lawler, Metzger, Keeney & Logan,
LLC
2001 K Street, N.W., Suite 802
Washington, DC 20006
Email:
edaniels@lawlermetzger.com
**Outside counsel to Sprint Nextel
Corporation
(Via Email)**

Jennie B. Chandra
Regulatory Counsel & Director
Federal Government Affairs
Windstream Communications, Inc.
1101 17th Street, N.W., Suite 802
Washington, DC 20036
Email:
jennie.b.chandra@windstream.com
**Counsel for Windstream
Communications, Inc.
(Via Email)**

/s/ Rayya Khalaf