



August 23, 2016

**VIA ECFS**

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

**Re: Special Access for Price Cap Local Exchange Carriers, WC Docket 05-25;  
AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local  
Exchange Carrier Rates for Interstate Special Access Services, RM-10593;  
Investigation of Certain Price Cap Local Exchange Carrier Business Data  
Services Tariff Pricing Plans, WC Docket No. 15-247.**

Dear Ms. Dortch:

Pursuant to the procedures outlined in the *Modified Protective Order*,<sup>1</sup> *Second Protective Order*,<sup>2</sup> and the *Tariff Investigation Protective Order*,<sup>3</sup> I hereby submit signed Acknowledgments of Confidentiality executed by the undersigned of the United States Telecom Association for purposes of accessing confidential and highly confidential information and documents submitted in the aforementioned docket(s). This filing supplements a previous submission dated August 18, 2016 by which the undersigned sought access to both Confidential and Highly Confidential Information submitted pursuant to the procedures outlined in the *Data Collection Protective Order*.<sup>4</sup>

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<sup>1</sup> *Special Access 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*, Modified Protective Order, 25 FCC Rcd 15168 (Wireline Comp. Bur. 2010).

<sup>2</sup> *Special Access 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*, Second Protective Order, 25 FCC Rcd 17725 (Wireline Comp. Bur. 2010).

<sup>3</sup> *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans, Special Access 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*, Order and Protective Orders, 30 FCC Rcd 13680 (Wireline Comp. Bur. 2015).

<sup>4</sup> *Special Access 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*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (Wireline Comp. Bur. 2014). See Letter to Marlene H. Dortch, Secretary, FCC from Jonathan Banks, Senior Vice President, Law & Policy, USTelecom, WC Docket No. 05-25, RM-10593 (filed Aug. 18, 2016).

Ms. Marlene H. Dortch  
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Pursuant to the *Modified Protective Order* and *Second Protective Order*, this filing has been served on Submitting Parties and a Certificate of Service is attached.

Please contact me at (202) 326-7272, if you have any questions regarding this submission.

Respectfully submitted,

A handwritten signature in blue ink that reads "Jonathan Banks". The signature is fluid and cursive, with the first name "Jonathan" and the last name "Banks" clearly legible.

Jonathan Banks  
Senior Vice President  
Law & Policy

cc: SpecialAccess@fcc.gov (via email)  
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Attachments

## CERTIFICATE OF SERVICE

I, Patricia Murray, do hereby certify that on this 23<sup>rd</sup> day of August, 2016, I caused a copy of the foregoing letter and Acknowledgments of Confidentiality to be served by email on the following:

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**(Via Email)**

/s/ Patricia Murray

## 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, D.C. this 23<sup>rd</sup> day of August, 2016.



[Name] Jonathan Banks  
[Position] Vice President, Law & Policy  
[Address] 607 14<sup>th</sup> Street, NW, Suite 400  
Washington, DC 20005  
[Telephone] (202) 326-7272

## 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, D.C. this 23<sup>rd</sup> day of August, 2016.



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[Name] Jonathan Banks  
[Position] Vice President, Law & Policy  
[Address] 607 14<sup>th</sup> Street, NW, Suite 400  
Washington, DC 20005  
[Telephone] (202) 326-7272

**APPENDIX A**  
**Attachment 1**

**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 23<sup>rd</sup> day of August, 2016.



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[Name]	Jonathan Banks
[Position]	Vice President, Law & Policy
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