September 9, 2015

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
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

Dear Ms. Dortch:

Pursuant to the procedures outlined in the Modified Protective Order,1 Second Protective Order,2 and Data Collection Protective Order,3 I hereby submit Acknowledgments of Confidentiality executed by Michael G. Jones, Mia Guizzetti Hayes, and the undersigned of Willkie Farr & Gallagher LLP, outside counsel to Birch Communications, Inc., BT Americas Inc., COMPTEL, EarthLink, Inc., and Level 3 Communications, LLC, for purposes of reviewing confidential and highly confidential information and data filed in the above-referenced proceedings, including information and data submitted in response to the Commission’s special access data collection.


Please contact me at (202) 303-1249 if you have any questions regarding this submission.

Respectfully submitted,

/s/ Stephanie Power

Counsel for Birch, BT Americas, COMPTEL, EarthLink, and Level 3

Enclosures

cc: SpecialAccess@fcc.gov
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 18th day of September, 2015.

Michael G. Jones
Special Counsel
Willkie Farr & Gallagher LLP
202-303-1141
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 9th day of September, 2015.

[Signature]

Michael G. Jones
Special Counsel
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20006
202-303-1141
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 9th day of September, 2015.

______________________________
Michael G. Jones
Special Counsel
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20005
202-303-1141
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.

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

Executed this 9th day of September, 2015

Mia Guizzetti Hayes
Associate
Willkie Farr & Gallagher LLP
202-303-1197
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.

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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 9th day of September, 2015

[Signature]

Mia Guzzetti Hayes
Associate
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20006
202-303-1197
APPENDIX A

Acknowledgment of Confidentiality

WC Docket No. 05-25, RM 10593

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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 9th day of September 2015

[Signature]

Mia Guizzetti Hayes
Associate
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20005
202-303-1197
APPENDIX C
Acknowledgment of Confidentiality
WC Docket No. 05-25; RM-10593

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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 1st day of September, 2015.

Stephanie Power
Associate
Willkie Farr & Gallagher LLP
202-303-1249
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.

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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 7th day of September, 2015

Stephanie Power
Associate
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20006
202-303-1249
APPENDIX A

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WC Docket No. 05-25, RM 10593

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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 9th day of September, 2015

[Signature]

Stephanie Power
Associate
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20005
202-303-1249