June 10, 2015

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-90

Dear Ms. Dortch:

Pursuant to the Second Amended Modified Joint Protective Order in the above-referenced proceeding1 and the instructions set forth in the Commission’s Information and Discovery Request dated September 9, 2014 (“Request”), AT&T Inc. (together with its subsidiaries and affiliates, “AT&T”) is submitting a supplemental exhibit responsive to Request No. 75. Specifically, this exhibit is the interconnection agreement entered into between AT&T and Cogent Communications, Inc. (“Cogent”) on June 8, 2015. In addition, as an executive summary to assist the Commission in its review of the agreement, AT&T is submitting two items: (i) a copy of the parties’ joint announcement of the agreement and (ii) a Highly Confidential comparison of the material terms of the agreement with those of the May 8, 2015 interconnection agreement between AT&T and Level 3 Communications, LLC. Enclosed is one copy of a DVD-ROM containing the unredacted versions of these documents.

1 Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations, MB Dkt No. 14-90, Second Amended Modified Joint Protective Order, DA 14-1640 (MB rel. Nov. 12, 2014).
As the Commission has stated, “Internet traffic exchange agreements have historically been and will continue to be commercially negotiated.” The enclosed agreement is a particularly recent example of such a negotiation, demonstrating again that, consistent with the Commission’s view, parties within the Internet ecosystem are fully capable of addressing traffic exchange by contract.

AT&T hereby requests Highly Confidential treatment of the June 8, 2015 AT&T/Cogent agreement and the comparison of that agreement with AT&T’s recent agreement with Level 3 Communications, LLC. Separately, AT&T is submitting a redacted public version of this filing via ECFS and unredacted copies of this submission to the Commission Staff.

Please contact me at (202) 942-6608 or Maureen.Jeffreys@aporter.com if you have any questions. Thank you for your assistance.

Respectfully submitted,

Maureen R. Jeffreys
Counsel for AT&T Inc.

Enclosure

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Cogent and AT&T have signed a long-term, bilateral interconnection agreement for their IP networks.

Washington, D.C., and Dallas, Texas, June 10, 2015 – Both companies issued the following statement:

Cogent (NASDAQ: CCOI) and AT&T (NYSE:T) have signed a long-term, bilateral interconnection agreement for their IP networks. This will not only improve efficiency of traffic exchange, but also create additional capacity and new interconnection locations between the networks allowing customers to continue to experience high-quality performance and network reliability. As the Internet continues to evolve, collaborations between Internet service providers facilitate the dynamic, robust and reliable exchange of Internet traffic.

"Both Cogent and AT&T’s customers will benefit from this agreement for years to come," said Dave Schaeffer, chief executive officer for Cogent. "We are putting customer needs at the forefront by enabling an expanded, secure and resilient interconnection environment."

"We ensure our customers have the best network experience possible," said Roman Pacewicz, senior vice president of Marketing & Global Strategy for AT&T Business Solutions. "With the added capacity and new interconnection locations, customers can continue to depend on AT&T to deliver high performance speeds to meet their needs."
Additional Attachment and Exhibit 75.2.27 Are Redacted in Their Entirety as Highly Confidential Information