>> Hopefully everybody can hear me out there. Let's get started. For some reason, you can't hear me, I hope you know to e-mail to let us know you're not receiving the audio. You probably didn't receive the instruction. Let's get started. This is the special access data collection high level overview webinar. Good morning. My name is Billy Layton assistant chief for the Division of Competition Bureau. Joined in the room with FCC staff people that are working on the special access data collection project including Eric Ralph, Bureau's chief economist, Dina Shetler, Pam Marlack. Wealth of talent in the room to help with us. I appreciate you all listening in today. Try too get the next screen.

Having a little technical difficulty, just bear with me. I'll just do it this way.

So the special access data collection mandatory one-time collection. Largely collecting data from 2013 from providers and purchasers of dedicated services. In certain entities that are providing best efforts, business type services. In price cap areas. We plan to use this data for comprehensive analysis for special access market as part of a

larger reform effort and regulation of incumbent LECs in price cap areas, responses are due by December 15, 2014 as you may know. Noncompliance is subject to fine or forfeiture so this is a serious collection. We use the term special access. Many of you are not in the incumbent LEC business. So you may not be familiar with that term. We use it in connection with the regulation of the ILECs to mean dedicated nonswitch transmission of voice and data between two points at guaranteed service levels. The picture you see below is of an ILEC type network where you have the dedicated transport between the wire centers and the users terminations to the end user. We use the term dedicated service to be a broader encompass. A lot of times people think special access as what's regulated by the FCC. We used a term that would be kind of more broadly thought of in capturing to mean not only circuit-based, TV based, DSL-1's and 3, packet based surveys like ethernet. As I go through the presentation today, we have several advanced questions and I'll try to address them as best I can. As we go through the slides. For example, we have one question from Dave SERED asking about what ethernet cable be included in the CBS data. No, it

would not. It would be covered in PBDS data.
Likewise, someone asked is sonic considered CBDS or
PBDS. While at a technical level, people think of
sonic as a circuit-based service. Our use of the
term circuit-based CBDS and TBDS is trying to capture
what's regulated and what's not by ILECs or thought
of in that realm. So for purposes of the
collections, sonic is treated as a PBDS service.
Largely because of the commission has prior years
fronted forbearance relief to ILECs and the provision
of that service largely. We're trying to see by
using these two subcategories of dedicated service,
to view them separately to make comparisons. We also
use the term best efforts business broadband area
access service. A lot of confusion I think in prior
talks with people as to what's the best effort
service vs. dedicated service. And how you
distinguish the two. For our purposes, these are
mutually exclusive categories. It's either one or
the other. And how we view them is largely the
dedicated transmission and guaranteed service levels
is our key kind of indicators as you see in the
definition, which obviously, I mean, instructions for
the collection and the questions, definitions, are

all in the website. Which I'll get to here in just a
second. I'm sure many of you would are on this event
is already seen those documents. If not, we'll
direct them to you.

So our collection is focused on gathering data
in price cap areas. Once again, this is a jargon
that is used in the regulation of incumbent LECs.
Two different categories. Rate of return and price
cap. This map year you're seeing here indicates in
green areas of price caps. Most of the country is
price cap. Many of your large metropolitan areas
would be included in the price cap areas. We have a
link to this map in particular. As of the last
couple of days, we've added a tool, mapping tool.
Let me see if I can get this. On this website, down
at the bottom, encyclopedia overview page, there will
be a quick link to a mapping tool that will give you
a greater degree of drill-down, down to the street
level as well as county, showing you those areas
which are shaded orange are considered rate of
return. Help you delineate between price cap and
rate of return areas. This is a newer tool, last
couple of days. In response to feedback received
from small cable companies. You think of things more

of in terms of the street level as far as how they
evaluate their own service territories.

Why that becomes relevant in price cap areas,
that's the scope of our collection. Whether you are
recovered in large part. You're clearly serving in a
price cap area or purchasing in a price cap area,
faced with a decision how do I parse out my decision
in a report. Might be more burdensome to parse it
out, what location, where your revenues are, what
type of areas. We'll take it across your territory
to ease the burden on respondents, so to speak.
(question)
>> In short, if you want to report for both price cap
and rate of return areas, you could do that too. If
you prefer just to report in price cap areas, and you
need to look at a street map, that will allow you to
drill right down to the street level.
>> We're taking a quick timeout while I talk to my
tech support.
>> Okay, we're back.

Okay, question we get a lot is am I required to
file. In fact, with all the, we have several
categories. He can inclusions from categories,
de minimis threats, from certain filer types. We put

in the reference to form 447, caused a lot of
confusion as well. So decision tree, to help people
guide them down this path of whether you need to do
anything, to what anything is that you need to do.
So decision tree starts with this form 447 reference
we have. And conceptually, we have this as a
mechanism to help us capture the full scope of
facilities-based competitors in price cap areas.
Basically, it's a list that we can use to check. The
group that we believe that would be covered. By
saying that, I mean when you file form 447, you
report broadband connections to end users, we feel,
best efforts largely, we also believe subsumed in
that group, which is a group of roughly at the
holding company level, about 16 to 1700 people or
companies. Within that group, we feel confident we
will capture in large part, the facilities-based
competitors of dedicated service providers in right
cap areas.

     We're having people, if you actually, that
triggers, if there's a trigger for you, you have
actually head that or require to file that form for
2013, report those types of connections, we're having
you come forward and kind of affirmatively tell us

either you are covered by our collection or you are not. Quite possible, some of these entities are exclusively in rate of return areas and really, aren't the folks that we're looking for this collection. This will give us a list to follow up to if people do not come forward and file something, then this will give us a list to go back to for enforcements purposes to see were you actually covered by our collection and didn't file. That's kind of the purpose behind the form 447 reference.

You start there. Where you're required to file that form, report those type of collections for 2013. If it's no, then you go down on the left side, and then you're looking at what we call filer types. Are you a provider in a price cap area? Are you a purchaser? Are you best efforts? If it's no across the board, then you don't do anything.

If you were required to file the form 447, the answer is yes, required to file it, you need to have a different decision tree. Go to the right. Do the same questions on each filer type category, whether you were triggered by that. If the answer is no across the board there, streamline certification down at the bottom right-hand corner there. Just need to

certify not covered. Website, which we'll talk about
here shortly, is designed to take these streamlined
certifications where you just simply identify who you
are, and say, I'm not the guy you're looking for, and
you certify as such. So we feel like I said, 1700
roughly, holding company level, file form 447. Our
thought or thinking is, maybe roughly of that 500 or
less, are actually providers in price cap areas. So
roughly, we expect to get hard data, which is this
blue elliptical object in the middle. Data in
response to data collection questions from a group
about roughly 500 or so providers. That wouldn't
count the purchasers though.

     So we get a lot of these questions. Looking at
the advanced ones here about how do the exceptions
and the de minimis thresholds work. We'll get that
as we go through the different filing categories. I
would say at the outset, for provider, top tier,
there is no de minimis threshold. There is no
categorical exclusion.
regardless of the size, and the number of connections
to locations that you have, you would be, if you
provide dedicated service in a price cap area, then
you would be covered. For those questions directed

at those providers. That's important concept.

    Then if you go to the purchaser, we have a
de minimis threshold of 5 million. If you spent
5 million or less in 2013 in a price cap area, then
you're not considered a purchaser. So what does that
mean? It means you wouldn't have to answer it's
questions directed at purchasers. And then for best
efforts, we have the de minimis, I think it's 15,000,
1500, threshold. And to the extent that you fell
below that threshold, you wouldn't be answering the
questions directed at best efforts providers. With
that being said, let's say you were no across the
board but happen to have 447 that you filed or were
required to file. You would still need to do the
streamline certification. So we get a lot of
questions on this point. Just Eric wants to add
something
>> Let me throw in that. Of course, the de minimis
exemption, for example, you could still turn around,
sorry, is this the -- on the de minimis is that the
one that would be voluntary? Okay. Sorry, I'm
mixing up -- there's some questions in there that are
voluntary per se. You could choose not to answer
those. If you have an issue, we would strongly

encourage you to answer them. Whole before of
questions especially in the purchaser section the
that are voluntary. That would limit your burden if
you choose not to answer those.

>> In my advance questions, enhanced price. He
wrote, first we are provider of less than 15,000
customers and less than 1500 business customers.
What questions are we provided to file. I don't know
if he means effort or dedicated service. No
exception from that service. Respond to those
particular questions as a provider. On the best
efforts piece, provider of best efforts, they
wouldn't respond to the best efforts customers or
best efforts questions. On purchaser side,
5 million, less than 5 million, wouldn't respond to
the purchaser questions. So for sections, guessing
provider sections 2A, on the collection, 2D, which
goes to all providers, and that would be it in that
example. Also, just looking back a little bit. We
had a question from Andrew Stevenson. Are bundles
with voice, Internet access and data considered to be
dedicated service? If dedicated service is a
component of your bundled offering, we're considering
that you're providing dedicated service. Providing

it as part of a bundle, but still providing it.

So did have one question asking when website is going to be up. Up as of October 1. There was a PN announcing that. Secured web portal. You have an FRN, log in, you designate what filer type you are. Presented with essay type questions. On your filer type, where you can upload answers. And then for the data collection questions that are numerical in nature, we have a special database container which will be used to gather that information, which not yet available. But it will be available in the near future. We are still in the process of testing that container with folks. As soon as we get the bugs worked out, we'll release that to the public and for use way container works, you're creating a database on your own network using a scrips we provide using a program called oracle. Load files, text CSB files, organize your data in the format specified in the instructions. You will load those files into this database container. Database container will then be dumped, zipped, and then uploaded to our website for delivery to the FCC. That's in a nutshell, the process. The more on that to follow. To get updates on where that stands, I know there's a lot of

questions about this database container. Please
check the FCC overview website periodically for more
information. We continue to update that website
weekly. Not only with FAQ's on weekly basis, because
as we see patterns of questions that we get from
folks, we provide answers there. So look there first
before calling the hot line which is another Avenue.
And the number will be at the end of the slide show
for the hot line.

    So the collection questions. You've already
figured out your part of the file. You've figured
out your file. Now it's answering various questions.
Looking at the advanced questions, see seem to be
centered on section 2A what's required of competitive
providers. We'll try to clear that, those
requirements for you. Clarify those requirements for
you. Looking at competitive providers, location
seems to be one much the number one questions that we
get. What locations are you trying to, you want us
to report. A lot of people ask, hey, we're selling
to a carrier, do we have to report it? Or vs., we're
selling it retail to a customer, do we have to report
it? I think conceptually, it's not so much who
you're selling it to. It's the nature of the

facility. So we're focused on the location questions last mile connectivity. Looking at locations where nonresidential locations where end users being business types, governments, educational institutions, located and you're connecting them. You own that facility, that connection, or you lease it as an IRU, in the case of competitive providers, or obtain it as a UNE. Unbundled element. Question shouldn't be are you selling that connectivity to another carrier who's selling it. The question is do you own a last mile facility to a location where end user is located? If so, then you have to provide information on that location in response to those questions.

Then we'll drill down on each of these categories. You can see here the nature of the competitive provider questions. Location, maps, billing information, revenue related, and then other, as mentioned before, there's no exception or exemption or categorical exclusion for small businesses in relation to these competitive provider questions.

As I mentioned, here are the triggering points. Last mile facility, IRU, obtained as a UNE.

Competitive providers, it's not only what you are
actually selling as a service to people, like
providing, use that term providing as like selling.
It's also your idle facilities, dark fiber included
that are capable of providing dedicated service,
capable. For more information on what we consider
capable, it's in the September 2013 Bureau level
order DA-13909. 13-909 I believe it is. If you go
to the FCC overview page, you'll see it on the list
of important decisions at the bottom of website.

for capable, this might be the next slide. I'll
work on that. That last point is pretty important.
Locations, simply leasing. That last mile facility,
you're simply a leaser. You don't own it. You don't
lease it as an IRU. You don't obtain it as a UNE.
If you're just leasing, that's not a cover location
because you're really not a facilities based provider
of that connection. What you are is a purchaser of
that connection. Customer and then you're reselling
it, perhaps. Or you're the end user using it.

So in capable, in the September 2013 order, we
outlined, clarified this more. Pretty
straightforward. If you're not a cable company, it's
basically any connection, any last file facility that

you own, leases an IRU or obtain at UNE is to be

reported. Those locations need to be reported. If

you're a cable company, we've given slightly

different treatment. Idle and in-service connections

connected to Metro head ends. Considered capable, if

it's not connected to a Metro E head end, it would be

those actually being used to provide dedicated

service.

     I'll try to -- we've had a lot of questions on

these sections. So I'll try to just peruse them here

real quick. Some of these are kind of wordy. I'll

do the best I can. It says, Eric, could you come

over here? Several questions from John Francis. If

a UNE is used by a CLEC provision, is that reportable

by the CLEC. We considered DSL as part of best

efforts?

>> Yes. It would depend a little bit. To the extent

that what was being supplied was essentially best

efforts Internet service, no, it would not be

relevant. To just give an illustration. If you are

supplying same kind of service that you would supply

to a household, where you take a UNE from an

incumbent local exchange carrier, and you provide

maybe telephone service, and ordinary, a DSL Internet

service, that would not be considered dedicated
service. That would be considered a best effort
service. That would not be a location that would
count in this area that you would still, not want to
be caught by the best efforts section. That's a
separate question.

>> Trigger is UNE to provide dedicated service.
Dedicated service and best efforts service are
mutually exclusive categories. It can't be both.

>> Right.

>> It says, if -- another one from John Francis. If
a leased facility is used to host VoIP, it is subject
to being reported? Used for hosted VoIP. Is it
subject to being reported? If you're just simply
leasing the facility, you don't own it, lease it as
an IRU or obtain it as a UNE to provide dedicate the
service, it is not a location covered within that
reporting requirement.

>> If, for some reason, you were for example, the
lease was for a UNE, so you're getting a UNE and
obtaining -- sorry, obtaining a UNE from incumbent
LEC and you are supplying just a voiceover Internet
telephone service, that's all that you were
supplying, that would not count as a dedicated

service. It would have to be that you were leasing a
UNE, purchasing a UNE from a LEC, and then you were
supplying, for example, DS1 service over that UNE to
your customer, then that would count. Or you might
be providing a complex set of business services that
really couldn't be supplied except for the underlying
supply of the dedicated service. Then again, that
would be counted. If all you're doing is providing
best efforts Internet service or voice service of
some kind, that wouldn't be counted. Or both best
efforts Internet service and ordinary voice service,
there was no SLA's, in that agreement, it was just a
standard, effectively standard PSTN plus best efforts
Internet, it would not be counted.

>> Okay, I'll proceed. I want to make one point. We
dived into the location questions. You can see above
that, in that CHART here, questions to isolate
facilities service providers. The way it's designed,
first two questions tell us if you have any of these
facilities that we're interested in. That you own
them, based on IRU Orvin obtain them as a UNE. If
you're a wholesaler or carrier that it's wholesale,
access resells it, you're not going to be answering
the rest of the remaining questions in section 2A.

Or even the questions in section 2D. You'll note in the collection questions, there's a note to this effect. What you would be answering are questions related to purchasers which are in the later sections.

Sorry, just jumping around here. I don't see it here.

So I guess next we'll talk about billing, mapping will come later. Billing, we get a lot of concern about billing. It's for your monthly, for 2013. It's important to understand what with the billing questions for competitive providers, that we're only interested in where you are actually billing out the dedicated service component and in an identifiable manner, meaning it's not part of a bundle, it's given one rate, it's actually itemized out on the bill for the customer, or you just sell it just the transmission part separate from the bundle. The reason is we're trying to do an apples to apples type comparison with the rates charged by ILECs who do the history, they have a different way of pricing their services. Not as much as a bundle so to speak for their legacy services. By not including like bundled rates, single rate for a bundle of services,

enterprise services, you're offering a customer, if you exclude that from the billing information questions, we believe that should take out a lot of the billing information that you would have to report. It should be a much smaller subset. So that should tremendously decrease the burden on you providing that type of information. The way those questions are set up, it goes like provide the monthly billing, link to a location, then we have you identify a billing code, related to the circuit element, and then adjustment codes, some people have taken stress over the I guess the math or the CHART that we provide as an example of the way things can be broken out for billing codes. That's an ILEC type model. We understand that it's competitive providers don't you necessarily bill that way and that question does allow for you to customize and define your own billing codes for, let's say end to end type service. So you don't have to break it down by the various parts. So we're not asking you to break down your information in an ILEC model. The tools are there for you to define it as you bill it, so to speak.

We recognize there's a challenge here. Basically the locations that you reported previously,

you can have a unit guide for those locations. Link
what you're billing to the location. We know that is
a challenge. It's been expressed to us how billing
systems maybe inventory systems don't necessarily
sync. So we recognize that may be a difficulty.
Also, this billing question the way it's phrased is
not limited to necessarily the last mile facility
solely. It does allow for say your dedicated
transport type services, middle mile, interoffice
transport type services you provide, provide billing
information in that regard. We're not only
interested in I think some of the questions I got in
advance, were, hey, we sell to a carrier. Do we have
to provide billing information? Yes. The answer is
yes. We don't care who you sell it to. We're
interested in what you're selling to, not only the
last mile facility, but also for this question, the
dedicated transport. If you look at the instructions
on the data formatting, recognize that you might not
have a location ID when providing transport.
Provide instructions to how to handle that in that
situation.
>> Let me go back to the dedicated service vs.
managed or bundled or enterprise services. To help

be clearer, if you're selling a straight-up ethernet link or TDM service such as DS1 or DS-3, then those are -- that's a straight out list price for that particular service, that's definitely something you would report.

If, instead, you're selling to the customer a complex managed services, and there is no break down or no really sensible break down between, say, the voice part of that and the data management part of that and the access to the Internet part of that, then you would not be reporting that. The only instance where you're selling lots of services that you would actually have to report a price would be that if you actually had the services separated out and there was a dedicated service separated out with a list price, that was part of your line item on your bill, then you would just have to report that one piece of your total bill to that customer.

>> I see there's a couple of billing-related questions. I'm going to have the billing guru. while he's reading that and creating answers to those questions, I'm going to go forward a little bit.

So the mapping question. Two parts. It's showing your fiber routes that you own or leases,

IRU. In the I guess the local geographic area.
Different treatment, depending on whether you're a
cable company or not a cable company. If you're not
a cable company, still competitive provider, you
would go all the way down to location. If you're a
cable company, you would do the middle mile office
transport routes. Accuracy standard. Sheet file
formats. They will be uploaded as essay question in
that part of the secure web portal, it will be listed
like an essay question where you would have fields to
upload documents. That's where you'll find where you
will be responding. Separate part of that question
is reporting of notes. For noncable companies, it
will be all nodes that use intersect with third-party
networks. For cable, going to be Metro E upgraded
head ends. Accuracy standard there. Questions come
up as to a lot of the other questions we reference
the year 2013, this one, we do not. People have
asked, when, at what point in time does the
information need to be accurate. We've taken a
position only FAQ's, should be as of now. Should be
accurate as of when you file, not necessarily as of
the end of the year, 2013. Going back, my guru has
had a chance to look at billing questions.

>> Accuracy filing, we don't require you to create maps exactly the day that you file. It's we're saying you don't have to go back to 2013.

if you have a map that's suitable that you produce in March of 2014, that's perfectly good.

>> So the first question here is, by David Saret, it concerns what happens when the there is sort of a multi-year contract for a dedicated service, that contract ends, and then the consumer continues to purchase on a month to month basis after that. Where the contract, I believe is the question as phrased here, ended before the reporting period. So the contract terms, technically ran out, say, before 2013. But the services continued to purchase on the same terms, same price, I presume, the same amount bills, into 2013, how do you report the end date for the contract?.

So the way I would report that, is once the contract period ends, you would just report it as if it were a month to month service. So that the initial contract term would not even be included in that billing. If that makes sense. So the service that's continued to build billed on a month to month basis, would be continued as if it was purchased,

term of one month and the purchase price for that
month. There would be no necessary end date reported
with that because service would just be on a month to
month basis.

the second question by Andrew Stevenson, says,
in providing prices by circuit element, do we have to
report by bill cycle for the months or circuit
element appears in the January cycle 1, disconnected,
do we have to report them? I think what this
question is asking is, if the circuit was
disconnected in, say, December of 2012, but billed in
January of 2013, do you have to report that. I think
the answer that we have for that is no, right? This
is only for services provided in 2013. Disconnected
in 2013, billed in 2013, you do not have to report
that circuit.
>> Thank you, Jack.
>> competitive providers, Sam. Competitive
providers. Sampling question. 2A6, talking about
sampling of locations provided previously. Not
something you're going to be submitting information
by the 2014 deadline. Intended to be a post
submission inquiry. Something that the commission
would come back to, Respondents, provider

Respondents, after the fact. Details of which are still being logistically worked on how that would occur. Probably along the lines of e-mail or some sort of letter asking for sampling, from a sampling that we pull some additional information on, on the deployment history. The reason why we're doing this fee sampling we recognize that it might be hard to get some of these details. We want to kind of limit the number of locations that are not required to do it for all locations.

The revenue questions we have, as an OMB approval process, terms and conditions and help us size the market for various category of services being these legacy services and also the packet based type of services. We had a revenue break down as to bandwidth by capacity, sold. That's no longer a mandatory requirement. As a result of OMB should be noted in the question as it currently stands. Something you could provide on voluntary basis. similarly with the RFP's, it was a three part question. First part was tell us about your successful bids. I think actual verbiage in front of he me, something like top five successful bids in the past few years. Then it went to unsuccessful bids,

then process to how you decide to bid. Those last
two components as a result of OMB's process are now
optional. But you can provide those if you desire.

>> Looking for the advanced questions. Give they a
minute.

>> for ILECs, the questions are set up basically the
same. I mean, watches for their operations. They
don't have to report their idle connections so to
speak. Just what they're selling. That's the big
difference. Billing information, they should have a
lot more of it because of the way they offer their
service. Subject to regulation. Identify wire
centers and the regulatory treatment associated with
them. Then there's the revenue terms and conditions
related questions. To help us understand like what
kind of contracts and tariffs, what terms and
conditions are associated with them. As we kind of
try to categorize the type of conditions. There's
no, just like with the competitive providers, there's
no small business exemption or de minimis cutoff.

     So this is a section C of the collection best
efforts providers. It only applies, you get the
de minimis, set forth there, 15,000, 1500. There's

also another trigger to require you to provide info.
It's if you submitted data in connection with the SBI
grant program for 2013. If you didn't, these
questions are not triggered, it's just the way it was
set up. So it's important, not a lot of people are
really cognizant of that other condition.

Then the questions directed as all providers.
Like two essay type questions. They're pretty
straightforward. Questions directed at purchasers.
There's two categories. Purchasers here. Those that
are mobile wireless providers and those that are not.
As a result of OMB, several things have happened.
One, you have a de minimis threshold now of
$5 million cutoff. Less than that, don't have to
respond at all to these questions. If you're above
that, still, many of the questions, I think the only
there's like a handful now, four or five in each
section that are mandatory. The rest are optional.
That being said, the point of these questions are to
identify problems in the provision of service by
carriers to customers. If we don't have the record
of a problem, then it really leash it's the
commission with little to do-leaves the commission
with little to do to resolve that question. Many of

these questions are optional, they are important. If
those seeking relief from the commission, we would
need a record to base that relief.

So I encourage people, even though they're
optional, to respond.
I wouldn't say there's not a burden associated with
answering these questions, but hopefully you'll see
the benefits of responding, outweighing the burden in
that regard.

In the September 2013 order, we also had, did a
clarification as to other types of entities excluded
from the collection. Because of the way purchasers
were defined, any entity subject to the commission's
jurisdiction that could be a really large pool if you
think about it. Equipment manufacturers, tower
registration owners, holders, other types of
licensees, experimental licensees. You name it.
Could have been a large pool. Only reason you are
subject to the commission's jurisdiction is because
of one of these type of categories, like you're not a
provider service elsewhere. Then we gave relief.
Exclude you from the collection all together. But
for a long list of those entities, further details on
that, those exclusions, you can look at the FCC

overview Web page. You can also look in the instructions. Talks about it. You can also look at the September 2013 order.

Okay, so we have a lot of questions and advanced questions talking about protective order. Person that worked closely on that item, which is we released a protective order on October 1, 2014. Recognizing that much of the information that we're asking for people is commercially sensitive. That order sets forth the processes for handling, submitting, accessing that information. I will turn it over to Chris COVES in our office who worked closely with talk about that and answer questions that we received.

>> Thanks Billy. So one key point to bring up based on questions we received is that when the data container is operational and filers upload documents through the portal through the data container, all that have data is presumptively highly confidential data under the protective order. We received question regarding mapping data from Scott Ringo, and how to handle at the essay uploads with the confidential filing option and highly confidential filing option. Basically, in the confidential filing

option, can you submit a redacted document. Stamp it

redacted consistent with the protected order. In the

highly confidential section, you can upload your

highly confidential fiber route mapping data.

Received questions regarding references to specific

questions in the appendix for highly confidential

data and information. And basically, at this stage,

all data submitted in response to the collection by

the web portal databased container presumptively is

highly confidential. Highly confidential categories

cover the category of information in the appendix and

are broader than the specific question numbers

referenced. That said, the Bureau will supplement

the data collection protective order as necessary.

We received a question from Andrew Stevenson

regarding whether filers have to have a counsel of

record. If you look at the protective order, there

are two different categories of access that you can

gain by executing the acknowledgment. A

confidential-only access and highly confidential

access. Basically, with the confidential access, you

can have internal staff. You can also have

consultants. For it's highly confidential access,

you will need an outside consultant or outside

counsel not involved in competitive decision-making to be able to analyze that data. Those were some of the questions we received.

>> Just looking over the advanced questions, basically, reached the end of the slide deck. I'll still take this opportunity to answer questions that I can on the fly here. Which was, think I Scott Ringo had a question regarding the purchaser section 2F. How many of the questions are optional. But yet in the instructions, it says you still need to upload a document in the web portal. The reason why that is, if a question is optional, we're asking for that document to be uploaded basically saying unapplicable. If that's what you want. Or do not wish to respond to that particular question, if it's optional. Just the way that website is designed. It's looking for a document fields. If it doesn't see a document uploaded at all, the way it's designed, it will gets an error message. So for all of those essay upload questions, there lass to be some document uploaded. As part of the validation process of the website during the submission. Otherwise, we'll get an error. What I mean there is to further clarify, when you have a certain filer

type, certain essay questions are going to pop up.
System is going to be looking for uploads and those
in response to those particular questions. So
hopefully, that helps.

So this is the highlight number. Filtering
system. Front line questions that people who man the
stations can answer. The harder questions get
directed upward to staff for further responses. We
encourage people to take advantage of that.

Also, as mentioned, as we get all of these
questions coming in, we're getting a lot of them come
in, we're updating the FAQ section on the overview
website weekly at this point. Providing additional
answers. So continue to check that. I think it will
have the date it's most recently updated on it.

I know there's still a lot of questions
remaining. I'm sure more came in as we were talking.
This will not be the last opportunity to speak on the
subject. November 14th, we're having an SEBA brown
bag session at Wiley Rind, saying legal community,
it's open to all it all. Doesn't wish to attend in
person, another opportunity to talk to us
face-to-face. Mostly from practitioners though to
discuss how are we supposed to be responding to these

questions in particular, what are you looking for, and things of that nature. Less about the overview, probably more just giving people an opportunity to talk to us.

Also, in early December, maybe late November, with the holidays around there, cognizant of that, we're going to have another webinar talking more just on the filing mechanics and walking through website, database container should be available at that point. If not, then that's an issue. It should be publicly available and there's a lot of complexities with that database container and a lot of documentation that we have. Put together. We expect a lot of questions in that regard on the database container. So I think that's about it for us. We have five more minutes. I guess we can -- okay. I'll just randomly pick out some questions here. From Dottie North, can we certify for all of our FRN's and affiliates at the holding company level. That's going to the certification piece. The way it's set up, if you see the instructions, you can file as a one giant entity holding company level, reporting all of your data for your various subsidiaries in one fell swoop or break it out by individual companies. Or operating

entities UNEs, you can do that as well. All that we ask, if you break it out, expands for attachment, help us link up so we can roll them all up for our purposes internally. If you did file as one, holding company parent level, for all of your subsidiaries, yes, you can certify in fact, you would be expected to certify at that point for the parent would certify for everyone in that point, accuracy of the information is being provided.

If you break it out, the way it's set up, the person filing has to certify. That's just the way it's set up. So that's the answer there.

I recall a question, somebody asked, in the file ID question, we have an area identify who your parent is. Parent doesn't have an FRN, does it need to get one. Short answer is yes. We want to identify the parent. If you're a subsidiary of somebody else. So please, yes. Register the FRN. That's a pretty straightforward simple process. Doesn't cost any money. Pretty much automatic grant or issuance, rather. But yes, we would like to see that. There fact, if you identify the parent in the filer ID section and don't provide an FRN, you should get an error message in that regard.

We've had a lot of questions on privacy security. Can't really address them right this second. People have asked in the billing information, we've asked for people to provide subscriber names and also subscriber names, I'll stop there. How that relates to CPNI, EQWA and cable-EX. Cognizant of those concerns. We do feel that there is a position for the FCC in getting that information and we continue to work on that front and we will provide guidance, could be as an FAQ or elsewhere, once all the details are worked out. But we are cognizant of that issue. So I really don't have anything else. Do you have anything else?
>> We get a lot of questions on dark fiber. For competitive providers, facility that's capable of providing dedicated service for our purposes. Something we want to know about. The fact that it's idle and not in use right now, doesn't mean we don't want to know about it. So if you own it, lease it as an IRU or obtain it as a UNE, I doubt you would do that actually, then yes, it would be a connection to a location that's reportable.

So I think we'll wrap up. Please use the SPADC@FCC.ulv e-mail for questions. We'll continue

to Monday or that throughout the process. And we

appreciate your attendance today and hope you found

it helpful. We look forward to seeing you and

talking with you in the future. All right? Thanks.