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VIA OVERNIGHT UPS

April 29, 2011

Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

- claim of confidentiality
- notice of intent
- request for confidentiality
- filed by OPC

COMMISSION CLERK

For DN 02998-11, which is in locked storage. You must be authorized to view this DN.-CLK

110000-0T

11 MAY -2 PM 2: 18
ACTION CENTER

RE: RNK Inc. d/b/a RNK Communications, Inc. (Company Code TX942) Request for Confidential Information on RNK's REVISED responses to the Data Requests associated with the Commission's 2011 Competitive Local Exchange Carrier (CLEC) Questionnaire

Dear Clerk Cole:

According to the procedures contained in the Commission's rules,¹ RNK requests confidential treatment of its revised responses to some of the Data Requests associated with the Commission's 2011 CLEC Questionnaire ("Questionnaire.") In particular, RNK submits that responses to Parts II-A (information regarding its local voice grade equivalent channels), II-B (information pertaining to its Voice over Internet Protocol ("VoIP") customers) and V (Zip Codes of its customers) included with its revised Form 477 filings to the FCC, for the period ending December 31, 2010 be kept confidential. In addition, RNK respectfully requests that its revised responses to Table 5 5 of the Commission's data sheets for the period ending December 31, 2010 be also kept confidential.

In particular, Part II-A of its FCC Form 477, which was filed under a confidentiality request with the FCC, states the number of Voice Grade Equivalents RNK provides to its customers in Florida, and various other statistics regarding the same, including how they are provisioned and whether RNK is the presubscribed long distance carrier. Part II-B of its FCC Form 477 states the number of its interconnected VoIP customers, the percentage of those customers that are "nomadic," and how many resellers of RNK's VoIP service have end users in the state of Florida. Part V of its FCC Form 477 consists of a list of ZIP codes of RNK's customers. Moreover, Tables 1 and 5 of the Commission's requests break down RNK's "traditional" and interconnected VoIP service customer base, respectively, by number of customers in each exchange or rate center, as well as by class (business or residential) of customer.

The information that is requested by the Commission is confidential and is treated as such by RNK. This information is not known to the public or to RNK's competitors and is maintained by specifically authorized individuals within the RNK. When it is necessary for RNK to release this information to an third party, it does so only under a strict Non-Disclosure Agreement signed by the receiving party placing them under a contractual duty to maintain confidentiality regarding RNK's competitive information. Furthermore, RNK has requested, and received, similar treatment for similar reports submitted to other State Public Utility Commissions, and to the FCC.

¹ Rule 25-22.006(5), F.A.C.

- COM _____
- APA _____
- ECR _____
- GCL _____
- RAD _____
- SSC _____
- ADM _____
- OPC _____
- CLK _____

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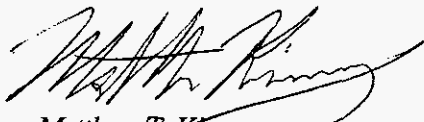
The Commission requires RNK to divulge information that is competitively sensitive and confidential. It request RNK to provide information that would provide detailed intelligence regarding the location and nature of RNK's customer base. Any one (or part of any one) of these alone would be cause for RNK to demand confidentiality, but in the aggregate it gives competitors a detailed picture of RNK's business plan. Piecing this information together, in conjunction with other, publicly available information will give competitors detailed insight regarding the thrust of RNK's competitive endeavors and, perhaps, use it to their business advantage to undermine or unfairly target RNK's services or prices, or duplicate RNK's business plan, among other actions they might take. Simply stated, maintaining the confidentiality of customer information and network structure is in the public interest and does not deprive the citizens of Florida of any vital information necessary for an informed choice.

Included with this letter is a sealed envelope containing a 3.5-inch Floppy Disk with the Confidential Responses to the data table requests in Microsoft Excel format as well as an unredacted version of RNK's FCC Form 477, in Adobe .PDF Format. The sealed envelope also contains hard copies of the confidential tables and Form 477, with confidential information highlighted as required by the Commission's rules.

Also are two hard copies of a redacted public version of the Data Tables and the Form 477. The redacted public versions of both documents will also be filed via email.

If you have any questions, feel free to contact me at (781) 613-6148 or by email at matt@rnkcom.com.

Sincerely,



Matthew T. Kinney
Manager of Regulatory Compliance

Form 477 Submission for FRN: 4343737, Company: RNK, Inc., State: FL, Operations: Non-ILEC, Data as of Dec 31, 2010
 Status: On Apr 27, 2011, the status for this Form 477 submission was changed to Revised - Submitted.

All filers must complete Items 1 through 11 below

Data Description	Value
Data as of	Dec 31, 2010
1. FRN	4343737
2. Company	RNK, Inc.
3. Type of Operations	<input type="radio"/> ILEC <input checked="" type="radio"/> Non-ILEC
4. Use this drop-down list to select a single name, such as the holding company, to identify all commonly-owned or commonly-controlled filers. Commonly-controlled filers with no holding company should decide on a single name to use for this question. Select "not shown" if no appropriate name appears in the list.	Wave2Wave Communications, Inc.
If you selected "not shown" above, type in the single name that will identify all commonly-owned or commonly-controlled filers.	
5. State	FL
6. Contact person (person who prepared the submitted data)	Matthew Kinney
7. Contact person telephone number and email address	Phone. 7816136148
	Email. mat@mkcom.com
	Confirm Email. mat@mkcom.com
8. Status of submission	Revised - Submitted
9. Indicate whether you request non-disclosure of some or all of the information in this submission because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.	<input type="radio"/> No <input checked="" type="radio"/> Yes
10. Official (corporate officer, managing partner, or sole proprietor) whose signature certifies that he/she has examined the information contained in this Form 477 and that, to the best of his/her knowledge, information and belief, all statements of fact contained in this Form 477 are true and correct. For purposes of this Form 477, the entry of the official's name on this line shall constitute that official's electronic signature to this certification. Persons making willful false statements in a Form 477 can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).	Sanford McMurry
11. Certifying official telephone number and email address	Phone. 7816136000
	Email. sandy@mkcom.com

REDACTED

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Part II.B: Interconnected VoIP Service

See Instructions for definitions of terms used in this Part. If you report end user subscriptions in (1) - (2), you must also complete Part V of Form 477.

Reporting by State: Subscriptions reported in (1) must be reported in the state of the subscriber's "Registered Location" as of the data-collection date. (This is the most recent information obtained by an interconnected VoIP service provider that identifies the physical location of the end user. See 47 C.F.R. § 9.3.) Subscriptions reported in (2) must be reported in the same state as the broadband connection purchased in conjunction with the VoIP service.

	(1) VoIP subscriptions that end users purchased from you without also purchasing a broadband connection from you	(2) VoIP subscriptions that end users purchased from you in conjunction with the purchase of a broadband connection	(3) Wholesale customers who purchased your VoIP service to resell as their own VoIP service
(a) Total number. See instructions on what to include.	[REDACTED]	[REDACTED]	[REDACTED]
(b) Percentage of (a) provided under residential grade service plans	[REDACTED]	[REDACTED]	
(c) Percentage of (a) purchased under terms that allow use with any broadband connection ("nomadic" functionality)	[REDACTED]	[REDACTED]	
(d) Percentage of (a) provided in conjunction with a copper wire-based broadband connection (DSL or Other Wireline)		[REDACTED]	
(e) Percentage of (a) provided in conjunction with a fiber-to-the-end user broadband connection		[REDACTED]	
(f) Percentage of (a) provided in conjunction with a Cable Modem broadband connection		[REDACTED]	
(g) Percentage of (a) provided in conjunction with a fixed wireless broadband connection		[REDACTED]	
(h) Percentage of (a) provided in conjunction with any other type of broadband connection		[REDACTED]	

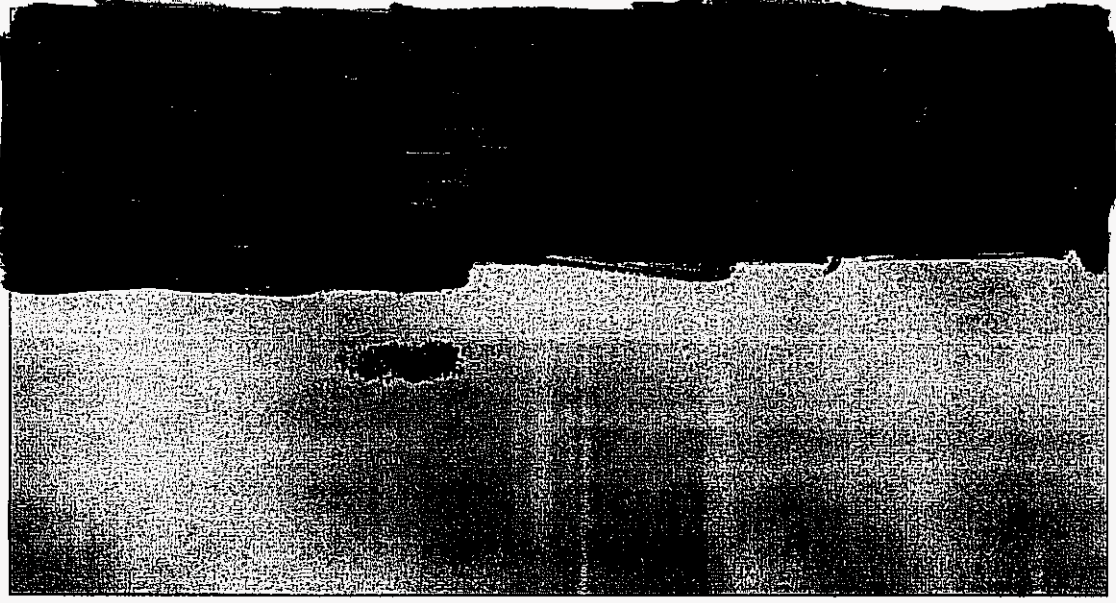
Part II.A: Local Exchange Telephone Service

	(1)	(2)	(3)	(4)
	Voice-grade equivalent lines and voice-grade equivalent wireless channels in service to your end user customers	Voice-grade equivalent lines you provided to unaffiliated communications carriers under resale arrangements including, among others, commercial agreements that replaced UNE-P and resold services such as local exchange, Centrex, and channelized special access	Lines you provided to unaffiliated communications carriers under any UNE loop arrangement where you did not also provide UNE switching for the line. (Do not convert UNEs to voice-grade equivalents.)	Lines you provided to unaffiliated communications carriers as UNE-P. (Do not convert UNEs to voice-grade equivalents.)
(a) Total number. See instructions on what to include.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
(b) Percentage of (a) that are residential lines	[REDACTED]			
(c) Percentage of (a) for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]			
(d) Percentage of (a) used for residential service AND for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]			
(e) Percentage of (a) provided over your own (including affiliates) local loop facilities or the equivalent	[REDACTED]			
(f) Percentage of (a) provided over UNE loops obtained from an unaffiliated carrier without also obtaining that carrier's UNE switching for that line	[REDACTED]			
(g) Percentage of (a) provided over UNE-Platform (but treat commercial agreements that replaced UNE-P as "provided by reselling," below)	[REDACTED]			
(h) Percentage of (a) provided by reselling unaffiliated-carrier services including, among others, commercial agreements that replaced UNE-P and resold services such as local exchange, Centrex, and channelized special access	[REDACTED]			
(i) Percentage of (a) provided over optical fiber at the end user premises	[REDACTED]			
(j) Percentage of (a) provided over coaxial cable at the end user premises	[REDACTED]			
(k) Percentage of (a) provided over fixed wireless at the end user premises	[REDACTED]			

Part V: Zip Code Information -- Local Voice Telephone Service and Interconnected VoIP

If you reported local exchange telephone lines in service to your end user customers, in Part II.A (1), or VoIP subscriptions that end users purchased from you, in Part II.B (1) or (2), you must list the 5-digit ZIP Codes in the state in which you had end user customers. Do not include any ZIP Codes in which you offered your local exchange telephone or VoIP service but had no end user customers, and do not include any out-of-state ZIP Codes.

Type all five digit ZIP codes in the following text box, separated by either commas, spaces, or carriage returns:



Errors / Warnings

No Errors or Warnings found.

Table 5: VoIP Access Lines on a Voice-Grade Equivalent (VGE) Basis

REDACTED

Company Name:

Company Code*:

* Your Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

THIS TABLE IS TO ONLY CAPTURE VoIP LINES. DO NOT INCLUDE LINES REPORTED IN TABLE 1.

Complete Table 5 if you provided VoIP service to Florida *end users* via one or more *voice-grade equivalent (VGE)* lines or wireless *VGE* channels.

An access line connects the end user's customer premises equipment (CPE) to the serving switch and allows the end user to originate and/or terminate local telephone calls on the public switched telephone network (PSTN). The access line counts in Table 5 below must be based on **all** of your different types of access lines (including fixed wireless) that are used to provide VoIP service.

Each field must be populated. All entries must be made without quotation marks.

The data must include lines of all affiliated companies.

TABLE COLUMN INSTRUCTIONS:

Column (a). **Reported NPA-NXX data should not be based on secondary service locations (i.e., where service has been moved temporarily to a secondary location such as a vacation home).**

Each NPA-NXX and corresponding data must be entered in a separate row. Please combine lines that have the same NPA-NXX.

Column (b). Enter the abbreviation **Res** for Residential lines or **Bus** for Business lines. **Residential lines and business lines must be entered in separate rows.**

Column (c). Enter line count as *voice-grade equivalents (VGEs)*. Report *VGEs* based on how the customer is billed. If the customer is billed for a dynamic bandwidth VoIP product, the line count would be the maximum number of VoIP lines available. If the customer is billed for a specific number of VoIP lines, or a range of lines, the VoIP line count would be the number of VoIP lines or the highest number of the range, respectively. **Each line count must be entered in separate rows.**

Please provide data as of December 31, 2010.

(a)	(b)	(c)
NPA-NXX i.e.(850-413)	Res or Bus	Total <i>VGE</i> Lines

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