

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
1998 Biennial Regulatory Review -- )  
Repeal of Part 62 of the )  
Commission's Rules )

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CC Docket No. 98-195

**COMMENTS OF SBC COMMUNICATIONS, INC.  
TO THE NOTICE OF PROPOSED RULEMAKING  
TO REPEAL RULES GOVERNING INTERLOCKING DIRECTORATES**

**COMES NOW** SBC Communications, Inc. ("SBC") to file this, its Comments on the Notice of Proposed Rulemaking to repeal the Part 62 rules governing interlocking directorates. SBC agrees with the Commission's tentative conclusion that Part 62 of its rules governing interlocking directorates is no longer necessary to the public interest, and therefore should be eliminated. Other laws provide sufficient protection against the potential for harm that is targeted by Part 62, which constitutes merely duplicative and unnecessary regulatory red tape.

The Commission is correct that elimination of Part 62 would further the goal of establishing a "pro-competitive, de-regulatory national policy framework" for the United States telecommunications industry. Although SBC did not raise this specific item in its Petition for Biennial Review, the matter was raised by USTA in its Petition for Biennial Review and supported by SBC in its comments on USTA's Petition. SBC applauds this effort of the Commission to move forward to eliminate unnecessary and outmoded regulation where retention of the existing regulatory rules simply cannot be supported under a standard

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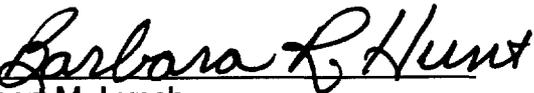
Comments of SBC Communications Inc.  
December 14, 1998

cost/benefit analysis. SBC is in complete agreement with the statement in the Notice of Proposed Rulemaking released on November 19, 1998, that continuation of the rules contained in Part 62 is no longer in the public interest and that, therefore, those rules should be repealed.

Thank you for your consideration of these comments.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

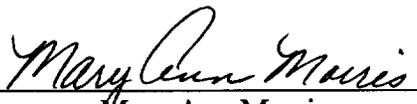
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December 14, 1998

**Certificate of Service**

I, Mary Ann Morris, hereby certify that the foregoing "Comments of SBC Communications, Inc." in CC Docket No. 98-195 has been served on December 14, 1998 to the Parties of Record.

  
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Mary Ann Morris

December 14, 1998

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