

April 25, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
RE: WC Docket No. 05-65
SBC Communications Inc. and AT&T Corp.
Applications for Approval of Transfer of Control

Dear Secretary Dortch:

The purpose of this letter is to support the applications of SBC and AT&T Corporation to the Federal Communications Commission (FCC) for the approval of a transfer of control between the two companies. The Illinois Telecommunications Association (ITA) is celebrating its one hundredth year of existence representing the telecommunications industry in the State of Illinois and we find it fitting that we have this opportunity to support the merger of SBC and AT&T.

Geographical boundaries as a determinate in regulating telephone service in this country has ended. The segregating of telecommunication services among companies has disappeared. The competitive nature of the telecommunications marketplace for enhanced connectivity is driving the technological innovations and infrastructure investment of today. SBC and AT&T find themselves in a struggle to compete in this environment. Both have endured dramatic declines in market capital, revenues, and jobs; yet both have significant strengths and resources that are critical to the future of the telecommunications industry for the United States in a global economy. The combined company will be a stronger and more enduring global competitor than either company could be alone, capable of delivering the advanced network technologies necessary to offer integrated, innovative high quality and competitively priced telecommunications services to meet the national and global needs of all classes of customers worldwide.

From a public policy position, the Illinois Telecommunications Association has long been an advocate of regulatory expediency and minimal conditioning of telecommunication mergers and acquisitions. Toward that end, we would recommend that the FCC's review of these applications be done in an expeditious manner and that the merger be approved unconditionally. From our perspective, the longer the application period, the greater the loss of synergies for enhanced network deployment. Regulatory conditions on the merger of two very well known companies would only deflect resources away from technological innovations and capital investments. The pace of change in the global telecommunications industry

is such that companies need to be nimble and aggressive and not saddled with onerous regulatory conditions.

We believe the merger of SBC and AT&T will enhance the connectivity of individuals and businesses, be in the public good and advance the position of the United States in a global market. For these reasons, the Illinois Telecommunications Association requests that the Federal Communications Commission approves the merger of SBC and AT&T expeditiously and without condition.

Sincerely,

Douglas Dougherty, CAE
President
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