



July 20, 2005

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ex Parte Submission

Re: SBC Communications Inc. and AT&T Corp. Applications for Approval of Transfer of Control – WC Docket No. 05-65; and Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control – WC Docket No. 05-75.

Dear Ms. Dortch:

On July 19, 2005, Daniel C. Pyzik of FiServ, Inc., John C. Smith of First Data Corporation, Laurel Kamen of American Express, and the undersigned on behalf of the Ad Hoc Telecommunications Users Committee (“Ad Hoc”), met with Michelle Carey, Wireline Legal Advisor to Chairman Kevin Martin.

The Ad Hoc representatives discussed the issues raised in Ad Hoc’s Reply Comments in this docket as well as (1) the lack of competitive providers and facilities in geographic areas outside of urban cores, which are the same geographic areas in which Ad Hoc members have most of their locations; (2) the BOC’s claims that regulation prevents them from negotiating custom deals with enterprise customers, even for services or in areas for which the BOCs have received contract tariff authority under the FCC’s pricing flexibility rules; (3) the specialized interstate services and service features available only from AT&T and MCI, including a national network presence; (4) the refusal or inability of the BOCs and Tier 2 interexchange carriers (“IXCs”) to provide the same service level agreements as the Tier 1 IXCs; and (5) the lack of cable, satellite and other wireless services that are substitutable for wireline services.

Pursuant to Section 1.1206(b) of the Commission’s Rules, 47 C.F.R. § 1.1206(b), this letter is being filed with the Office of the Secretary.

Sincerely,

A handwritten signature in cursive script that reads 'Colleen Boothby'.

Colleen Boothby

Counsel for
Ad Hoc Telecommunications Users Committee