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July 22, 2005

**BY ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re:** *In the Matter of Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from AT&T Corp., Transferor, to SBC Communications Inc., Transferee, WC Docket No. 05-65 – REDACTED FOR PUBLIC INSPECTION*

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Dear Ms. Dortch:

Staff have requested that SBC Communications Inc. provide the underlying source information used by Dr. Schwartz in Table 3 of his Initial Declaration, which shows that the Internet-related revenues confirmed the unconcentrated nature of providers of Internet Backbone related functions. Table 3 of the Initial Schwartz Declaration was constructed from unpublished data gathered by third party research firm, IDC. SBC has been given permission by IDC, however, to submit the data underlying Table 3 under the terms of the First Protective Order issued in this proceeding. A copy of the source data containing the information on Dedicated Internet Access (“DIA”) and Upstream Transit (“UT”) revenues that were used by Dr. Schwartz is Confidential Exhibit 1 to this letter.

Staff also requested that SBC provide the names of the “Providers” listed in Appendix 4 to the Initial Schwartz Declaration, which showed the trends in AS connections. With the permission of Telegeography, SBC is providing as Exhibit 2 to this letter the requested data.

In accordance with the Order Adopting Protective Order<sup>1</sup> and at the request of the Staff, SBC is filing by hand a copy of Confidential Exhibit 1 with Gary Remondino of the Wireline Competition Bureau and with the Office of the Secretary, while this letter and Exhibit 2 are being filed electronically by ECFS. The unredacted document will be made available for inspection, pursuant to the terms of the Protective Order, at the offices of Crowell & Moring LLP.

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<sup>1</sup> *In re Applications of SBC Communications Inc. & AT&T Corp.*, WC Dkt No. 05-65, Order Adopting Protective Order, DA 05-635 (WCB rel. Mar. 10, 2005).

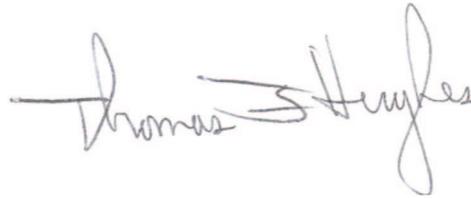
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If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, reading "Thomas F. Hughes". The signature is written in a cursive style with a large, looped "H" and a long, sweeping underline.

Thomas F. Hughes

cc (via email): Gary Remondino  
Marcus Maher