

September 30, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Dear Ms. Dortch:

Re: 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.

Applications for Consent to Transfer Control of Filed by
Verizon Communications, Inc. and MCI, Inc., WC Docket
No. 05-75.

This will provide notice that on September 29, 2005, Nancy E. Lubamersky, Vice President, Public Policy and Strategic Initiatives, TelePacific Communications, and the undersigned met with: Michelle Carey, Office of Chairman Kevin J. Martin; Russell Hanser, Office of Commissioner Kathleen Q. Abernathy; and Scott Bergmann, Office of Commissioner Jonathan S. Adelstein concerning issues in the above-captioned proceeding. We presented the views set forth in the attached document which was provided at the meetings.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat" followed by a long horizontal flourish.

Patrick J. Donovan

- Introduction to TelePacific Communications

- Losing AT&T and MCI as independent providers removes the majority of competitive alternatives to reach TelePacific customers' buildings ("last mile" of HiCap)
 - SanDiego03/15 addressability

"TelePacific, a member of the Joint CLECs, ... reports that for all its circuits to various buildings in San Diego, it relies wholly on PacBell for special access channel terminations because alternative providers are only available 4.5 percent of the time."
From 7/29/05 Joint CLEC Reply Comments in Dkt. 05-25
 - San Francisco 01/03/21 addressability

Nine percent of TelePacific customers will be "reachable" using alternative DS1 providers.
 - SBC-CA's 95/5 Special Access/UNE ratio limits for discounts

- Price certainty is key to competitive LECs
 - SBC-CA's month-to-month, Limited service and Full service MSA Special Access prices have increased this year.
 - SBC also revamped its DS1 Term Pricing Plan

- Loss of AT&T and MCI from the competitive LEC community causes a severe resource imbalance in participation in special access pricing proceedings.

- Cap SBC interstate special access rates for five years

SBC Communications Inc.

This filing is being made on a streamlined basis on 15 day's notice under Section 204(a)(3) of the Communications Act.



FRN: 0005-0490-85

April 29, 2005

Transmittal No. 223

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

The accompanying tariff material, issued by Pacific Bell Telephone Company (PBTC) and bearing Tariff F.C.C. No. 1, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended.

This filing, scheduled to become effective May 14, 2005 consists of the tariff page indicated on the following Check Sheets:

<u>Tariff F.C.C. No.</u>	<u>Check Sheet Revision No.</u>
1	213th Revised Page 1
	58th Revised Page 1.7
	9th Revised Page 1.12
	25th Revised Page 1.14

With this filing, PBTC is proposing rate changes involving Special Access High Capacity Service and Broadband Circuit Service (BCS) rate elements. Increases to High Capacity rate elements will be offset with decreases being made to BCS rate elements. There will be no impact to existing regulations. This filing will also establish a new tariff section, Section 17, as the vintage section for the PBTC F.C.C. No. 1 tariff.

Supporting information discussed under Section 61.49 of the Commission's Rules, to the extent applicable, is included.

Wireline Competition Bureau

Page 2

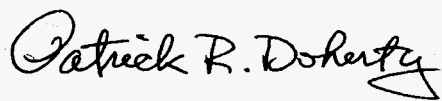
April 29, 2005

In accordance with Section 61.14, this transmittal letter and associated attachments are being filed electronically today via the Federal Communications Commission's Electronic Tariff Filing System (ETFS) in compliance with the electronic filing procedures. .

Payment in the amount of \$720.00 has been electronically transmitted to the Mellon Bank in Pittsburgh, Pennsylvania, in accordance with the fee program procedures. The Form 159 is being transmitted electronically via ETFS as a proprietary document. These actions have been committed on the date established as the issued (filed) date as reflected above.

Personal or facsimile service petitions against this Transmittal, as required under Section 1.773(a)(4) of the Commission's Rules, should be sent to A. Alex Vega, Area Manager - Tariff Administration, Four Bell Plaza, Room 1970.04, Dallas, Texas 75202, facsimile number (214) 858-0639. All other correspondence and inquiries concerning this Transmittal should be addressed to Debra L. Clemens, Associate Director-Federal Regulatory, (202) 326-8882, 1401 I Street, N.W., Suite 1100, Washington, D.C. 20005.

Sincerely,

A handwritten signature in cursive script that reads "Patrick R. Doherty". The signature is written in black ink and is positioned to the left of the "Attachments:" section.

Attachments:

- Transmittal Letter
- Tariff Pages
- Tariff Review Plan (TRP)
- Description and Justification
- Exhibit

PBTC - Rate Changes

ST	ZN	DESCRIPTION	BASE PERIOD DEMAND	CURRENT RATE	PROPOSED RATE	CURRENT REVENUE	PROPOSED REVENUE	REVENUE CHANGE
CA	1	DS1 CHAN TERM	312,228	\$125.55	\$129.00	\$39,200,225	\$40,277,412	\$1,077,187
CA	2	DS1 CHAN TERM	306,992	\$135.55	\$136.00	\$41,612,766	\$41,750,912	\$138,146
CA	3	DS1 CHAN TERM	398,352	\$143.00	\$144.25	\$56,964,336	\$57,462,276	\$497,940
CA	1	DS1 TPP - CHAN TERM TPP 1YR	142	\$125.00	\$126.00	\$17,750	\$17,892	\$142
CA	2	DS1 TPP - CHAN TERM TPP 1YR	131	\$135.00	\$136.00	\$17,685	\$17,816	\$131
CA	3	DS1 TPP - CHAN TERM TPP 1YR	61	\$142.50	\$144.00	\$8,693	\$8,784	\$92
CA	1	DS1 TPP - CHAN TERM TPP 2YR	693	\$120.00	\$126.00	\$83,160	\$87,318	\$4,158
CA	2	DS1 TPP - CHAN TERM TPP 2YR	518	\$130.00	\$135.50	\$67,340	\$70,189	\$2,849
CA	3	DS1 TPP - CHAN TERM TPP 2YR	650	\$137.50	\$139.00	\$89,375	\$90,350	\$975
CA	1	DS1 TPP - CHAN TERM TPP 3YR	541	\$117.50	\$121.00	\$63,568	\$65,461	\$1,894
CA	2	DS1 TPP - CHAN TERM TPP 3YR	605	\$122.50	\$123.75	\$74,113	\$74,869	\$756
CA	3	DS1 TPP - CHAN TERM TPP 3YR	791	\$132.50	\$133.50	\$104,808	\$105,599	\$791
CA	1	DS1 TPP - CHAN TERM TPP 5YR	4,887	\$105.00	\$113.00	\$513,135	\$552,231	\$39,096
CA	2	DS1 TPP - CHAN TERM TPP 5YR	6,855	\$110.00	\$115.00	\$754,050	\$788,325	\$34,275
CA	3	DS1 TPP - CHAN TERM TPP 5YR	11,080	\$120.00	\$121.50	\$1,329,600	\$1,346,220	\$16,620
CA	1	DS1 TPP - CHAN TERM TPP 7YR	906	\$102.50	\$110.00	\$92,865	\$99,660	\$6,795
CA	2	DS1 TPP - CHAN TERM TPP 7YR	721	\$107.50	\$112.00	\$77,508	\$80,752	\$3,245
CA	3	DS1 TPP - CHAN TERM TPP 7YR	949	\$117.50	\$118.75	\$111,508	\$112,694	\$1,186
CA	1	DS1 CHAN MIL - > 0 IOM	388,639	\$9.00	\$10.00	\$3,497,752	\$3,886,391	\$388,639
CA	2	DS1 CHAN MIL - > 0 IOM	627,021	\$9.50	\$10.00	\$5,956,700	\$6,270,210	\$313,511
CA	3	DS1 CHAN MIL - > 0 IOM	2,668,490	\$10.00	\$10.15	\$26,684,900	\$27,085,174	\$400,274
CA	1	DS1 TPP - CHAN MILE - PER MILE TPP 1YR	0	\$9.00	\$10.00	\$0	\$0	\$0
CA	2	DS1 TPP - CHAN MILE - PER MILE TPP 1YR	0	\$9.50	\$10.00	\$0	\$0	\$0
CA	3	DS1 TPP - CHAN MILE - PER MILE TPP 1YR	276	\$10.00	\$10.00	\$2,760	\$2,760	\$0
CA	1	DS1 TPP - CHAN MILE - PER MILE TPP 2YR	0	\$9.00	\$10.00	\$0	\$0	\$0
CA	2	DS1 TPP - CHAN MILE - PER MILE TPP 2YR	15	\$9.50	\$10.00	\$143	\$150	\$8
CA	3	DS1 TPP - CHAN MILE - PER MILE TPP 2YR	2,471	\$10.00	\$10.00	\$24,710	\$24,710	\$0
CA	1	DS1 TPP - CHAN MILE - PER MILE TPP 3YR	0	\$8.75	\$9.75	\$0	\$0	\$0
CA	2	DS1 TPP - CHAN MILE - PER MILE TPP 3YR	285	\$9.25	\$9.75	\$2,636	\$2,779	\$143
CA	3	DS1 TPP - CHAN MILE - PER MILE TPP 3YR	4,104	\$9.50	\$9.75	\$38,988	\$40,014	\$1,026
CA	1	DS1 TPP - CHAN MILE - PER MILE TPP 5YR	0	\$8.50	\$9.50	\$0	\$0	\$0
CA	2	DS1 TPP - CHAN MILE - PER MILE TPP 5YR	2,464	\$9.00	\$9.50	\$22,176	\$23,408	\$1,232
CA	3	DS1 TPP - CHAN MILE - PER MILE TPP 5YR	53,833	\$9.25	\$9.50	\$497,955	\$511,414	\$13,458
CA	1	DS1 TPP - CHAN MILE - PER MILE TPP 7YR	0	\$8.25	\$9.25	\$0	\$0	\$0
CA	2	DS1 TPP - CHAN MILE - PER MILE TPP 7YR	87	\$8.75	\$9.25	\$761	\$805	\$44
CA	3	DS1 TPP - CHAN MILE - PER MILE TPP 7YR	6,813	\$9.00	\$9.25	\$61,317	\$63,020	\$1,703
CA		DS1-COLLOCATION TRANSPORT (1.544 MBPS)-IOM	12,237	\$9.00	\$10.00	\$110,137	\$122,375	\$12,237
CA		DS1 - TPP - COLLOCATION TRANS - CHAN MILE - PER MILE - TPP 1YR	0	\$9.00	\$10.00	\$0	\$0	\$0
CA		DS1 - TPP - COLLOCATION TRANS - CHAN MILE - PER MILE - TPP 2YR	0	\$9.00	\$10.00	\$0	\$0	\$0
CA		DS1 - TPP - COLLOCATION TRANS - CHAN MILE - PER MILE - TPP 3YR	0	\$8.75	\$9.75	\$0	\$0	\$0
CA		DS1 - TPP - COLLOCATION TRANS - CHAN MILE - PER MILE - TPP 5YR	0	\$8.50	\$9.50	\$0	\$0	\$0
CA		DS1 - TPP - COLLOCATION TRANS - CHAN MILE - PER MILE - TPP 7YR	0	\$8.25	\$9.25	\$0	\$0	\$0
CA	1	DS1 MUX - DS1 TO VG/DIG.	2,910	\$200.00	\$240.00	\$582,000	\$698,400	\$116,400
CA	2	DS1 MUX - DS1 TO VG/DIG.	3,357	\$250.00	\$275.00	\$839,250	\$923,175	\$83,925
CA	3	DS1 MUX - DS1 TO VG/DIG.	1,882	\$275.00	\$300.00	\$517,550	\$564,600	\$47,050
CA	1	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 1YR	0	\$190.00	\$230.00	\$0	\$0	\$0
CA	2	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 1YR	0	\$200.00	\$250.00	\$0	\$0	\$0
CA	3	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 1YR	0	\$210.00	\$250.00	\$0	\$0	\$0
CA	1	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 2YR	0	\$180.00	\$210.00	\$0	\$0	\$0
CA	2	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 2YR	0	\$190.00	\$210.00	\$0	\$0	\$0
CA	3	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 2YR	0	\$200.00	\$250.00	\$0	\$0	\$0

PBTC - Rate Changes

ST	ZN	DESCRIPTION	BASE PERIOD DEMAND	CURRENT RATE	PROPOSED RATE	CURRENT REVENUE	PROPOSED REVENUE	REVENUE CHANGE
CA	1	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 3YR	0	\$170.00	\$200.00	\$0	\$0	\$0
CA	2	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 3YR	0	\$175.00	\$200.00	\$0	\$0	\$0
CA	3	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 3YR	0	\$180.00	\$200.00	\$0	\$0	\$0
CA	1	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 5YR	0	\$160.00	\$195.00	\$0	\$0	\$0
CA	2	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 5YR	0	\$165.00	\$195.00	\$0	\$0	\$0
CA	3	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 5YR	0	\$170.00	\$195.00	\$0	\$0	\$0
CA	1	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 7YR	0	\$150.00	\$190.00	\$0	\$0	\$0
CA	2	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 7YR	0	\$155.00	\$190.00	\$0	\$0	\$0
CA	3	DS1 - TPP - CO MUX - DS1-DSO VOICE/DIGI - TPP 7YR	2	\$160.00	\$190.00	\$320	\$380	\$60
CA		BCS OC3 CHAN TERM VOL 1-MO-3 YR	120	\$2,560.00	\$1,900.00	\$307,200	\$228,000	(\$79,200)
CA		BCS OC3 CHAN TERM VOL 1-MO-5 YR	598	\$1,420.00	\$1,278.00	\$849,418	\$764,476	(\$84,942)
CA		BCS OC3 MIL FIXED-MO-3 YR	1,330	\$1,400.00	\$1,036.00	\$1,862,127	\$1,377,974	(\$484,153)
CA		BCS OC3 MIL FIXED-MO-5 YR	13,103	\$1,050.00	\$933.00	\$13,757,864	\$12,224,845	(\$1,533,019)
CA		BCS OC3 COLLOCATION TRANSPORT-FIXED-3YR OPP	0	\$1,400.00	\$1,260.00	\$0	\$0	\$0
CA		BCS OC3 COLLOCATION TRANSPORT-FIXED-5YR OPP	1	\$1,100.00	\$990.00	\$1,200	\$1,080	(\$120)
CA		BCS OC3 COLLOCATION TRANSPORT-IOM-3YR OPP	0	\$154.00	\$138.60	\$0	\$0	\$0
CA		BCS OC3 COLLOCATION TRANSPORT-IOM-5YR OPP	62	\$110.00	\$99.00	\$6,840	\$6,156	(\$684)
CA		BCS OC3 COLLOCATION TRANSPORT-NRC-3YR	0	\$1,500.00	\$1,350.00	\$0	\$0	\$0
CA		BCS OC12 CHAN TERM-VOL 1-MO-3 YR	24	\$7,300.00	\$6,570.00	\$175,864	\$158,277	(\$17,586)
CA		BCS OC12 CHAN TERM-VOL 1-MO-5 YR	85	\$4,600.00	\$4,140.00	\$391,418	\$352,276	(\$39,142)
CA		BCS OC12 CHAN TERM-VOL 2+-MO-3 YR	0	\$6,500.00	\$5,850.00	\$0	\$0	\$0
CA		BCS OC12 CHAN TERM-VOL 2+-MO-5 YR	30	\$3,700.00	\$3,330.00	\$111,168	\$100,051	(\$11,117)
CA		BCS OC12 MIL-FIXED-MO-3 YR	564	\$6,500.00	\$5,846.00	\$3,667,773	\$3,298,738	(\$369,034)
CA		BCS OC12 MIL-FIXED-MO-5 YR	1,012	\$5,800.00	\$5,220.00	\$5,872,500	\$5,285,250	(\$587,250)
TOTAL						\$207,025,909	\$207,025,647	(\$262)