October 4, 2005

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

Re: *SBC/AT&T Merger and Verizon/MCI Merger, WC Docket Nos. 05-65 and 05-75*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, CompTel hereby gives notice that on October 3, 2005, its representatives had separate meetings with Commissioner Kathleen Q. Abernathy along with Russell Hanser, Legal Advisor to Commissioner Abernathy, and Commissioner Jonathan Adelstein and Scott Bergmann, Legal Advisor to Commissioner Adelstein. In these meetings, CompTel urged the FCC to deny the above-referenced license transfer applications currently pending before the Commission. CompTel explained that, consistent with its Petitions to Deny these applications, the mergers in question would reduce competition for special access services (both channel terminations and interoffice transport) by reducing the amount of non-Bell metro transmission services available throughout the SBC and Verizon regions, and by foreclosing potential access revenue (from purchases by AT&T or MCI) from competitive wholesale carriers in the SBC and Verizon ILEC regions. Additionally, CompTel urged the Commission to deny the license transfer applications on the basis that they will eliminate the vigorous competition that currently characterizes the Internet backbone market by concentrating traffic in the hands of the two largest carriers.

Moreover, CompTel explained, consistent with its September 29, 2005 *ex parte* in the above-referenced dockets, that merger conditions would need to be exceedingly comprehensive in order to even begin to mitigate the competitive harms posed by the mergers. Thus, CompTel recommended that the more appropriate course of action would be to deny the above-referenced license transfer applications. Representing CompTel were Earl Comstock, CEO, and the undersigned attorney.

Sincerely,

_____/S/_____

Jonathan D. Lee
Sr. Vice President,
  Regulatory Affairs