

October 6, 2005

Via Electronic Filing

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

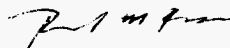
Dear Ms. Dortch:

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 October 5, 2005 Nancy E. Lubamersky, Vice President, Public Policy and Strategic Initiatives, TelePacific Communications, and the undersigned had a telephonic meeting with: Jessica Rosenworcel, Office of Commissioner Copps concerning issues in the above-captioned proceeding. We presented the views set forth in the attached document which was provided to Ms. Rosenworcel.

Sincerely,



Richard M. Rindler

- 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