

October 6, 2005

VIA ELECTRONIC FILING

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

Re: Ex Parte Notice, WC Docket Nos. 05-65, 05-75

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, CompTel hereby gives notice that on October 5, 2005, its representative had a telephone conversation with Jessica Rosenworcel, Legal Advisor to Commissioner Michael Copps. In this meeting, CompTel discussed the issues it identified in its Petitions to Deny the above-referenced license transfer applications. CompTel explained the enormous complexities that would need to be addressed in order for the Commission to try to mitigate the myriad competitive harms posed by the SBC/AT&T and Verizon/MCI mergers through post-merger regulation. Specifically, CompTel noted that the Commission would have to take steps to make special access circuits more liquid, and less "sticky," by eliminating exclusionary special access contracts and imposing performance standards on the grooming of special access circuits from Bell networks to those of competitive carriers. Similarly, the Commission would have to address the very complex issue of how to limit opportunities and incentives for the merged firms to leverage their Internet backbones to discriminate against both wholesale and retail competitors. Given the complexity of these problems, and the difficulty of policing regulatory solutions post-merger, CompTel urged the Commission to deny the merger applications. Representing CompTel was the undersigned attorney.

Sincerely,

____/S/____

Jonathan D. Lee

Sr. Vice President,
Regulatory Affairs