



October 20, 2005

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: In the Matter of SBC/AT&T Applications for Approval for Transfer of Control, WC 05-65; and  
In the Matter of Verizon/MCI Applications for Approval for Transfer of Control, WC 05-75.

Dear Ms. Dortch:

This letter is filed in accordance with Commission rules. On October 19, 2005, Wendy Fast of Consolidated Telephone Company, Charlie Cooper of Telec Consulting Resources, Cheryl Parrino of Parrino Strategic Consulting, Mike Huggenberger from Great Plains Communications and I spoke with Scott Bergmann, Legal Advisor for Wireline Issues to Commissioner Adelstein, via conference call on issues related to the above dockets on behalf of the Rural Alliance.

We proposed several merger conditions to mitigate both IP and circuit-switched market power abuse by SBC and Verizon post-merger. These are available as a separate attachment to this filing along with a diagram illustrating a potential post-merger IP backbone situation.

Sincerely,

A handwritten signature in black ink that reads "Ken Pfister". The signature is written in a cursive, slightly slanted style.

Ken Pfister  
Vice President-Strategic Policy

Attachments