



October 24, 2005

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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 21, 2005, Wendy Fast of Consolidated Telephone Company, Charlie Cooper of Telec Consulting Resources, Cheryl Parrino of Parrino Strategic Consulting and I spoke separately with Jessica Rosenworcel, Competition and Universal Service Legal Advisor to Commissioner Copps and Scott Bergmann, Legal Advisor for Wireline Issues to Commissioner Adelstein via conference calls 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 and expressed that without such conditions the mergers of SBC/AT&T and Verizon/MCI should not be approved.

These proposed merger conditions are available as a separate attachment to this filing.

Sincerely,

Ken Pfister
Vice President-Strategic Policy

Attachments