



Jack Zinman
General Attorney

AT&T Services, Inc.
1401 I Street NW, Suite 400
Washington, D.C. 20005
Phone 202 326-8911
Fax 202 408-8745

March 16, 2006

VIA ELECTRONIC SUBMISSION

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

Re: AT&T Petition for Declaratory Ruling That UniPoint Enhanced Services, Inc. d/b/a PointOne and Other Wholesale Transmission Providers Are Liable for Access Charges, WC Docket No. 05-276;

Frontier Petition for Declaratory Ruling that USA Datanet Corp. Is Liable for Originating Interstate Access Charges When It Uses Feature Group A Dialing to Originate Long Distance Calls, WC Docket No. 05-276; and

Petition for Declaratory Ruling that VarTec Telecom, Inc. Is Not Required to Pay Access Charges to Southwestern Bell Telephone Company or Other Terminating Local Exchange Carriers When Enhanced Service Providers or Other Carriers Deliver the Calls to Southwestern Bell Telephone Company or Other Local Exchange Carriers for Termination, WC Docket No. 05-276

Dear Ms. Dortch:

On behalf of AT&T Inc. (AT&T), Brian Benison and the undersigned met with Tamara Preiss, Steve Morris and Jennifer McKee of the Wireline Competition Bureau's Pricing Policy Division on March 15, 2006, to discuss the above-reference petitions. We explained that all of the IP-in-the-Middle services at issue in these petitions are telecommunications services subject to access charges under the plain language of section 69.5 of the Commission's rules and the Commission's *IP-in-the-Middle Order*.¹ We urged the Commission to expeditiously issue an order granting the AT&T and Frontier petitions and denying the Vartec petition. All of the matters discussed during the meeting were consistent with AT&T's previous filings in this docket.

¹ 47 C.F.R. § 69.5; *Petition for Declaratory Ruling that AT&T's Phone-to-Phone IP Telephony Services are Exempt from Access Charges*, WC Docket No. 02-361, Order, FCC 04-97 (released April 21, 2004) (*IP-in-the-Middle Order*).

If you have any questions or need additional information, please do not hesitate to contact me.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/

Jack Zinman

cc: Tamara Preiss
Steve Morris
Jennifer McKee