



June 15, 2006

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

Re: **Forbearance Petition of XO Communications, et al., WC Docket No. 05-170**

Pursuant to Section 1.1206 of the Commission's rules, COMPTEL hereby gives notice that on June 14, 2006, it met with Commissioner Copps and Scott Deutchman, Legal Advisor to Commissioner Copps with regard to the above-referenced forbearance petition. COMPTEL urged the Commission to grant the forbearance petition. COMPTEL specifically encouraged the Commission to forbear from enforcing its cumbersome "eligibility" restrictions, adopted in 2003, to prevent "stand-alone" IXCs and wireless carriers from using UNE combinations to provide exclusively long-distance or mobile wireless services. While COMPTEL never agreed with the policy of requiring a competitor to pay the forward looking cost of an entire element, but then preventing the competitor from providing any service that the BOC could provide using the UNE, the massive consolidation in the industry over the past 3 years has reduced even the ostensible "need" for these restrictions to a virtual null set. The BOCs, themselves, are the biggest IXCs and the biggest CMRS providers by far. Any continuation of these burdensome, architecturally-biased, restrictions will simply serve to perpetuate discrimination against the few remaining competitors to the Bells.

Representing COMPTEL was the undersigned attorney.

Respectfully submitted,

A handwritten signature in black ink, reading "Jonathan D. Lee".

Jonathan Lee

Sr. Vice President
Regulatory Affairs