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August 17, 2006

VIA ELECTRONIC FILING

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

Re: **Review of the Emergency Alert System, EB Docket No. 04-296**

Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as amended by the Cable Television Protection and Competition Act of 1992, MB Docket 05-311

In the Matter of Review of AT&T Inc. and BellSouth Corp. Application for Consent to Transfer of Control, WC Docket No. 06-74

Dear Ms. Dortch:

On Wednesday August 16th, Bob Quinn, Senior Vice President Federal Regulatory, and the undersigned both from AT&T met with Commissioner Tate and Aaron Goldberger, her Legal Advisor. During the meeting, AT&T reiterated its position that Commission has the necessary legal authority to streamline the franchise process and preclude build-out. AT&T cited its prior filings in MB 05-311¹ as examples that the Commission's record includes empirical data that local franchising authorities are unreasonably delaying the deployment of facilities necessary to allow new entrants to compete with cable companies and the franchising authorities are making unreasonable demands during the franchising process. Due to actions such as these, the Commission should act swiftly to enact a streamlined franchising process that allows entry into the video market so that consumers can enjoy the benefits of competition. As outlined in its public interest statement and subsequent comments filed in WC 06-74, AT&T also discussed the video related public interests benefits of the proposed AT&T – BellSouth Merger.

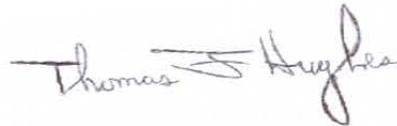
¹ See, e.g., Appendix C to AT&T's Reply Comments filed March 28, 2006; AT&T's May 24, 2006 ex parte filing.

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Consistent with its comments filed in EB 04-296, AT&T indicated that as a provider of IP video service it intends to participate in the Emergency Alert System (EAS), including providing presidential alerts. AT&T will "pass through" all EAS alerts, local as well as national, provided by local broadcast channel feeds. AT&T is developing an IPTV-specific solution for non-broadcast channels and is in the process of working with its middleware provider to define the interface between EAS equipment and the IPTV middleware. IP video is still a nascent technology and technical challenges remain in implementing EAS over this technology. AT&T is working with vendors to develop the appropriate equipment due to the fact that only a limited set of current EAS system receivers provide alert information in IP format. In addition, AT&T's IP video vendors have not yet developed the proxy server capability to route EAS messages to the appropriate end user. As a result of these and other technical challenges, the Commission should allow sufficient time to allow implementation. Specifically, AT&T requested that the Commission establish no deadlines earlier than December 31, 2007. At the same time, it was noted that the Commission should refrain from adopting rules that unduly restrict the manner in which IP service providers distribute and display emergency information, or that otherwise restrict innovation in this area.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Thomas J. Hughes". The signature is written in a cursive style with a large, stylized initial "T".

CC: Aaron Goldberger