

August 17, 2006

BY ECFS

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

Re: *In re AT&T Inc. and BellSouth Corporation Applications for Transfer of Control, WC Docket No. 06-74*

REDACTED – FOR PUBLIC INSPECTION

Dear Ms. Dortch:

AT&T Inc. (“AT&T”) hereby supplements its July 11, 2006 Response of AT&T Inc. to Initial Information and Document Request Dated June 23, 2006 (“Response”) by filing Amended Exhibits 46.1 and 49.1. These amended exhibits include corrected legacy AT&T Corp. international traffic data for 2005.

AT&T also hereby supplements its Response by filing Revised Exhibit 51, which provides revised estimates concerning legacy AT&T Corp. Global Telecommunications Services (“GTS”) revenue data for 2004 and 2005 in addition to the estimates provided in the original Exhibit 51. To arrive at the revised estimates, AT&T has adjusted the data further by excluding its estimates of revenues from purely domestic U.S. traffic as requested by the Staff. Because the revised figures result from estimates layered upon estimates, they are likely to be less precise than the original figures AT&T submitted. As AT&T said in the Response:

Because AT&T does not separately track GTS revenues and the estimation approach used here likely differs from the manner in which other providers and third parties estimate company-specific and industry GTS revenues, these revenue figures cannot be used to calculate market

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shares or to compare AT&T's revenue to "GTS" revenues that may be reported by other providers that directly track their GTS revenues or use other estimation approaches.¹

Information in the Amended Exhibits 46.1 and 49.1 and the Revised Exhibit 51 is both commercially and financially sensitive and is proprietary information that AT&T would not in the normal course of business reveal to the public or its competitors. In addition, Amended Exhibit 49.1 contains "world-total minutes and revenues for facilities-based U.S.-international traffic and pure resale U.S.-international traffic (combined)."² Accordingly, Amended Exhibit 46.1 and Revised Exhibit 51 have been redacted pursuant to the First Protective Order,³ and Amended Exhibit 49.1 has been redacted pursuant to the Second Protective Order.

Those redacted versions are enclosed with this letter. Pursuant to the Protective Orders and the direction of the Staff, five (5) paper copies and fifteen (15) CD-ROM copies of the unredacted filing are being delivered to Gary Remondino of the Wireline Competition Bureau Staff and one (1) CD-ROM copy of the unredacted filing is being delivered to your office. The unredacted filing will be made available for inspection, pursuant to the terms of the Protective Order and Second Protective Order at the offices of Crowell & Moring LLP. Counsel for parties to this proceeding should contact Jeane Thomas of that firm at (202) 624-2877 to coordinate access.

Please let me know if you have any questions.

Sincerely,



Peter J. Schildkraut
Counsel for AT&T Inc.

Enclosures

¹ Response at 100.

² *In re AT&T Inc. & BellSouth Corp. Applications for Approval of Transfer of Control*, WC Dkt No. 06-74, Second Protective Order, DA 06-1415, at 2 ¶ 5 (rel. July 7, 2006) (defining "Highly Confidential Information") ("Second Protective Order").

³ *In re AT&T Inc. & BellSouth Corp. Applications for Approval of Transfer of Control*, WC Dkt No. 06-74, Protective Order, DA 06-1032 (rel. May 12, 2006).