

October 11, 2006

BY ECFS

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

Re: Minor Amendments to AT&T Inc. and BellSouth Corporation Applications for Approval of Transfer of Control, WC Docket No. 06-74

Dear Ms. Dortch:

In the last day, AT&T Inc. (“AT&T”) and BellSouth Corporation (“BellSouth”); collectively, the “Applicants”) have filed (via the Universal Licensing System and in another letter already filed in ECFS) various minor amendments to the applications previously filed in this merger proceeding. These minor amendments are detailed in Exhibit 4 to this proceeding’s lead application for the wireless radio services (File No. 0002545739), which exhibit is attached hereto. Collectively, the amendments update the merger applications to reflect changes in the licenses held by various subsidiaries of BellSouth and by Cingular Wireless LLC (“Cingular”) and its subsidiaries during the course of this proceeding. Pursuant to an agreement with the Staff, the Applicants have filed these minor amendments at this time, so the Commission’s licensing records will be as up-to-date as possible for tomorrow’s open meeting at which the Commission is scheduled to consider these applications.

The filing of these minor amendments is not barred by the general prohibition against filing “presentations” during the “sunshine period.”¹ These ministerial filings are not “directed to the merits or outcome of [this] proceeding,” so they are not “presentations.”² Rather, they merely update the Commission’s records. However, even if these minor amendments were deemed to be presentations, they would be exempt under Section 1.1204(a)(1) because they “involve[] the filing of required forms”³ and under Section 1.1204(a)(10) because they were “requested by” and “made with the advance approval of” the Staff.⁴ Therefore, these minor amendments would be exempt from the sunshine period prohibition.⁵

¹ See 47 C.F.R. § 1.1203.

² See *id.* § 1.1202(a).

³ See *id.* § 1.1204(a)(1).

⁴ See *id.* § 1.1204(a)(10).

⁵ See *id.* § 1.1203(a)(1).

Marlene H. Dortch, Esq.

October 11, 2006

Page Two

If any questions arise about this letter, please feel free to contact one of us.

Respectfully submitted,

/s/ Peter J. Schildkraut

Peter J. Schildkraut
Arnold & Porter LLP
555 Twelfth Street, N.W.
Washington, D.C. 20004
202-942-5634

Counsel for AT&T Inc.

/s/ Scott D. Delacourt

Scott D. Delacourt
Wiley Rein & Fielding LLP
1776 K Street, N.W.
Washington, D.C. 20006
202-719-7459

Counsel for BellSouth Corporation

Attachment