



October 19, 2006

**EX PARTE**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Re: Ex Parte, WC Docket No. 06-74

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, COMPTEL hereby gives notice that on September 18, 2006, its representatives met with Commissioner Jonathan Adelstein, and Barry Ohlson and Scott Bergmann of Commissioner Adelstein's office. COMPTEL urged the Commission to deny AT&T's pending license transfer applications in conjunction with its proposed merger with BellSouth. COMPTEL explained that the proposed merger does not enhance the public interest, it further eliminates actual and potential competition between AT&T and BellSouth, and it increases the incentive of the post-merger firm to raise input prices to competitive wireless and wireline carriers. Moreover, COMPTEL also explained that the proposed merger conditions proffered by AT&T on Friday, October 13<sup>th</sup> (as corrected by AT&T's October 16<sup>th</sup> Erratum) do nothing to eliminate the public interest harms previously identified by COMPTEL and others. For all of these reasons, COMPTEL asked the Commission to deny the pending merger application, or at a minimum, to adopt conditions more likely to facilitate future entry and expansion in the post-merger firm's ILEC territories.

Representing COMPTEL were Earl Comstock, CEO of COMPTEL, and the undersigned attorney.

Sincerely,

/s/ Jonathan Lee  
General Counsel