October 23, 2006

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

Re: In the Matter of Application for Consent to Transfer of Control
Filed by AT&T and BellSouth Corp., WC Docket 06-74.

Dear Ms. Dortch:

On October 20, 2006, Chris Murray and Frank Cavaliere from Vonage participated in meetings with Scott Bergman (Legal Advisor on Wireline Issues to Commissioner Adelstein) and Chris Reichman (Intern, Commissioner Adelstein), as well as Scott Deutchman (Competition and Universal Service Legal Advisor to Commissioner Copps) to discuss the merger conditions proposed by AT&T in its pending combination with BellSouth.

In these meetings the participants discussed Stand-alone DSL, E-911 services, and Network Neutrality. Regarding Stand-alone DSL, Vonage stressed that it is critical to competition for customers to be able to keep their telephone numbers when transferring from one carrier to another, regardless of whether the account is “native” (DSL service operated by the incumbent) or “non-native” (DSL service operated by a competitive carrier).

Vonage also noted the importance of access to 911 services for competitive entry, and requested the Commission consider requiring a uniform plan for territory-wide 911 access, providing a single point of contact and accountability for 911 deployment.

Finally, Vonage answered staff questions on Network Neutrality regarding minimum required bandwidth and maximum tolerable latency for Internet phone services.

In accordance with Section 1.1206 of the Commission’s rules, this letter is being filed with your office in electronic format.

Sincerely,

/s/
Chris Murray
Vonage
1700 K St., NW, Suite 710
Washington DC  20006