

October 23, 2006

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

**Re: Notice of Oral *Ex Parte* Presentation - WC Docket No. 06-74, AT&T Inc. and BellSouth Corporation Applications for Approval of Transfer of Control**

Dear Secretary Dortch:

On October 20, 2006, Alexandra Wilson, Vice President of Public Policy for Cox Enterprises, Inc., Megan Delany, Senior Director and Legislative Counsel of Federal Government Relations for Charter Communications, and the undersigned met with Scott Deutchman of Commissioner Michael J. Copps's office to discuss the issues set forth in the written *ex parte* presentation filed by Advance/Newhouse Communications, Cablevision Systems Corp., Charter Communications, Cox Communications, and Insight Communications Company on September 27, 2006 in the above-referenced docket. We also discussed the conditions proposed by AT&T/BellSouth and reiterated the need for interconnection-related merger conditions as previously addressed in the September 27, 2006 *ex parte* filing. Finally, we explained that the transiting and forbearance conditions proposed by AT&T/BellSouth were insufficient. During the meeting, the parties discussed and distributed the attached handout.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

/s/ Michael H. Pryor

Michael H. Pryor

Attachment

cc: Scott Deutchman

**Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.**

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## CONDITIONS TO ENSURE FAIR AND EFFICIENT INTERCONNECTION

- Extend section 251/252 interconnection rights to cable voice providers, regardless of technology or regulatory classification.
- Establish interconnection arrangements that enable the exchange of IP voice traffic using an optical level, IP interface at technically feasible points identified by the cable provider.
- Reaffirm the right of competitors to choose a single, technically feasible point of interconnection in a LATA and bar AT&T from imposing additional build out or trunking requirements.
- Reduce the costs and delay of negotiating interconnection agreements by permitting cable telephony providers to:
  - opt into any interconnection agreement approved in any in-region state, subject to state-specific pricing and performance plans.
  - opt into agreements even if not yet updated to reflect changes of law, if the cable providers agrees to negotiate an amendment.
  - use their existing agreement as a starting point for re-negotiation.
  - extend the term of existing agreements for up to three years, subject to amendment for changes of law.
- Exchange non-access traffic, including VOIP, on a bill and keep basis at the cable voice providers request.
- Require AT&T to provide transiting service pursuant to section 251 and at cost-based rates.