

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Application for Consent to) WC Docket No. 06-74
Transfer of Control Filed by)
AT&T Inc. and BellSouth Corporation)

Comments of
Communications Workers of America

on
Merger Condition Proposals Submitted
by AT&T Inc. and BellSouth Corporation

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The Communications Workers of America (“CWA”) responds to the Commission Public Notice in which it seeks comment on proposals submitted by AT&T Inc. (“AT&T”) and BellSouth Corporation (“BellSouth”) to the Commission on potential merger conditions.¹ The AT&T/BellSouth proposals are contained in a letter to Chairman Kevin Martin attached to the Public Notice.²

CWA represents more than 175,000 employees at the merging companies. CWA represents 97,000 employees at AT&T, more than 42,000 at BellSouth, and more than 36,000 at Cingular. CWA has a long and proud history of partnership with these companies. CWA members look to share in the growth at the merged AT&T/BellSouth.

The merger of AT&T and BellSouth holds the promise of accelerating the deployment of high-speed Internet networks to many more Americans. The U.S. has fallen to 16th in the world in broadband penetration, with U.S. broadband speed far slower than in many other industrial nations. The combination of BellSouth’s fiber-rich network with AT&T’s investments in IPTV technology and content will result in faster deployment of high-speed networks than if the companies remain separate. The merger will also permit integration of the separate AT&T, BellSouth, and Cingular wireless networks into a single IP network capable of carrying local and

¹ Public Notice, “Commission Seeks Comment on Proposals Submitted by AT&T Inc. and BellSouth Corporation,” WC Docket No. 06-74, Oct. 13, 2006.

² Letter from Robert W. Quinn, Jr., Senior Vice President, Federal Regulatory, AT&T Services, Inc. to the Honorable Kevin Martin, Chairman, Oct. 13, 2006 (“Quinn Letter”).

long distance voice, data, and wireless traffic, making possible converged wireless/wireline services.³

AT&T/BellSouth's proposals include commitments to promote accessibility of broadband service by 1) extending broadband service (at speeds in excess of 200 kbps in at least one direction) to all residential living units in the AT&T/BellSouth region; 2) ensuring that at least 30 percent of the incremental deployment will be to rural or low-income households; and 3) providing a free ADSL modem and \$10 ADSL service to new subscribers. These proposals will provide concrete, merger-related benefit to consumers in the BellSouth region.

CWA encourages the Commission and AT&T/BellSouth to explore additional commitments regarding deployment of AT&T's Project Lightspeed in the BellSouth region. Commitments to bring the benefits of truly high-speed networks to the BellSouth region would represent a significant merger-related benefit.

AT&T/BellSouth has also discussed the possibility of repatriation to BellSouth territory of jobs that had been expatriated to overseas locations. CWA believes that specific commitments to bring offshore work back to this country to be provided by union-represented, career employees is a very positive merger-related benefit.

AT&T/BellSouth's proposals on public safety and disaster recovery will also

³ AT&T Inc. and BellSouth Corporation Public Interest Statement, WC Docket No. 06-74, March 31, 2006, 6-12, 20-25.

increase the public interest benefit of the proposed merger.

AT&T/BellSouth has agreed to abide by the FCC's Policy Statement on an Open Internet. The companies have also discussed network neutrality non-discrimination. Merger-related conditions should focus on specific, verifiable benchmarks for high-speed network deployment, which will provide the capacity to protect consumers' unrestricted access to an open Internet.

With sufficient bandwidth, consumers will be able to access whatever content they want on the Internet without fear of blocking, privileging, or degradation of any content or service. Any concerns about "net neutrality" should be addressed in an industry-wide rulemaking that would apply to all carriers, and not in the context of a merger proceeding.

Respectfully Submitted,

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October 24, 2006