

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

October 27, 2006

Re: Letter Submission in FCC WC Docket No. 06-74

Dear Ms. Dortch:

The America Channel submits this letter ex parte in the Commission's WC Docket # 06-74 (AT&T-BellSouth transaction).

Numerous parties have articulated thoughtful positions regarding this transaction. While we have not previously filed in this docket, we believe that AT&T's acquisition of BellSouth should be viewed primarily as a transaction which will result in accelerated rollout of video services in BellSouth's 9-State region.

The need for entry of a new competitor in the video distribution business in these markets, is in our judgment paramount. For some time, consumers and competitors have been subjected to the lack of effective competition which has characterized the video distribution industry – with severe adverse effects on consumer pricing, consumer choice, diversity, quality of content, and the ability of content providers to compete irrespective of affiliation.

These harms are not speculative – but actual, extensive, well-documented, and long-term. Consumers and content competitors are in critical need of more video competition on the ground. Based on experience, we believe that AT&T's acquisition of BellSouth will accelerate this competition, and provide independent programmers with new opportunities in BellSouth's regions – which will translate into more competition in content, more consumer choice, pricing pressure on expensive affiliated channels (and therefore improved consumer pricing), and greater diversity.

We believe this transaction is and should be a vehicle for creation of urgently needed video competition in BellSouth's 9-State region. For these reasons, we ask the Commission to approve the transaction.

Thank you for your consideration of these matters.

Sincerely,

A handwritten signature in black ink, appearing to read 'D.G.', with a small dot at the end of the second stroke.

Doron Gorshein

cc: Chairman Kevin Martin
Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Deborah Taylor Tate