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December 15, 2006

VIA ECFS

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

Re: *Ex Parte Notification: WC Docket No. 06-74: In the Matter of the Application Pursuant to Section 214 of the Communications Act of 1934 and Section 63.04 of the Commission's Rules for Consent to Transfer Control of BellSouth Corporation to AT&T, Inc.*

Dear Ms. Dortch:

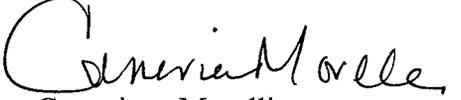
On December 14, 2006, the undersigned and Rick Richardson of Momentum Telecom, Inc. met with Chairman Tate's Legal Advisor, Ian Dillner. At that meeting, we urged the Commission to adopt the proposed condition addressing access to Section 271 network elements suggested by COMPTTEL. We pointed out that adoption of the COMPTTEL Section 271 merger condition would provide a vehicle to address the competitive issues regarding special access rates, terms and conditions identified by the Special Access Coalition. Adoption of the condition would have the added benefit of rendering unnecessary the increasing number of costly, resource-intensive lawsuits and proceedings before federal courts and state commissions in which the issue of state jurisdiction over Section 271 network elements is at issue. Further,

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adoption of the Section 271 merger condition would provide a mechanism for the administration of rates and terms for Section 271 network elements by the entities best suited for the job, *i.e.* the state commissions.

Respectfully submitted,


Genevieve Morelli

Attachment
cc: Ian Dillner