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August 8, 2007

**VIA HAND DELIVERY**

**REDACTED – FOR PUBLIC INSPECTION**

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

Re: *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers (WC Docket No. 05-25); AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services (RM-10593)*

Dear Ms. Dortch:

Covad Communications Group, NuVox Communications and XO Communications, LLC, through counsel, hereby submit for filing with the Commission their initial Comments in the above-referenced proceedings. The attached document is redacted for public inspection, in accordance the Protective Order in WC Docket No. 05-25. A **CONFIDENTIAL**, unredacted version of the same also has been submitted to the Commission Secretary, and to Ms. Margaret Dailey of the Pricing Policy Division of the Wireline Competition Bureau, under separate cover.

Attached please also find a duplicate of this filing. Please date-stamp the duplicate upon receipt, and return it to the courier. Please feel free to contact the undersigned counsel at (202) 342-8625 if you have any questions, or require further information.

Respectfully submitted,



Brett Heather Freedson

**KELLEY DRYE & WARREN LLP**

Ms. Marlene Dortch, Secretary  
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August 8, 2007  
Page Two

cc: Thomas Navin  
Daniel Gonzalez  
Ian Dillner  
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Scott Bergmann  
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Chris Moore