



Robert W. Quinn, Jr.
Senior Vice President
Federal Regulatory

AT&T Services, Inc.
1120 20th Street NW, Suite 1000
Washington, D.C. 20036
Phone 202 457-3851
Fax 832 213-0243

November 8, 2007

VIA ELECTRONIC FILING

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

Re: AT&T Inc. and Dobson Communications Corp Consent to Transfer
Control of Licenses and Authorizations, WT No. 07-153
Notice of Oral Ex Parte Presentation

Dear Ms. Dortch,

Throughout the course of this proceeding, AT&T Inc. and Dobson Communications Corporation (collectively, Applicants) have demonstrated that their merger will generate significant public benefits without any harm to competition. We have shown, for example, that the merger will make available to Dobson's largely rural and suburban customers a much broader array of services that include, rollover minutes, free wireless-to-wireline calling, free mobile-to-mobile calling to a much larger footprint of subscribers, and extensive international roaming options. The merger also will give Dobson customers access to a richer array of handset options, not the least of which is the iPhone.

Integration of the two companies' networks also will result in significant public benefits. Customers of both companies will enjoy enhanced service quality across a broader area, particularly in areas where customers currently experience dropped or blocked calls or dead spots. Greater cell density will permit faster data speeds and better penetration of buildings. Moreover, integration of wireless and wireline networks will benefit customers through unified billing and future innovative services. The combined network also will significantly reduce the combined company's roaming costs in an amount in excess of \$1 billion dollars over the next five years, and the transaction will result in substantial additional cost synergies currently estimated at \$2.5 billion.

These significant benefits will be achieved without any reduction in competition, particularly in light of the divestitures required as conditions for approval of this transaction. Therefore, there can be no doubt that prompt approval of this merger will further the public interest.

Nevertheless, in light of the conditions imposed in the Alltel acquisition approved by Commission last week, and to provide yet another public interest benefit by helping to minimize pressure on the federal universal service fund caused by rapidly increasing demand for high-cost universal service support, AT&T voluntarily commits to be subject to an interim cap on federal high-cost, competitive ETC support. Such cap shall be set at twelve times the level of support that AT&T Mobility and Dobson Communications collectively were eligible to receive as competitive ETCs for the month of June 2007. This cap shall apply until the earlier of comprehensive universal service reform addressing issues related to the distribution of high-cost support; or the elimination or modification of the interim cap, established in WT Docket No. 07-128, on high-cost, competitive ETC support provided to ALLTEL.

AT&T has long supported comprehensive universal service reform as well as an industry-wide, interim cap on high-cost support payments to competitive ETCs.¹ This commitment is consistent with that support and should help stabilize the federal universal service fund while providing the Commission with the necessary breathing room to consider fundamental reform to the current high-cost mechanisms, including such innovative proposals as AT&T's proposed broadband and mobility pilot programs.

In accordance with Commission's rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

/s/ Robert W. Quinn, Jr.

¹ See Comments of AT&T Inc., WC Docket No. 05-337, CC Docket No. 96-45 (filed June 6, 2007).