



Federal Communications Commission  
Washington, D.C. 20554

Adopted: August 29, 2007  
Released: August 29, 2007  
DA 07-3796

Joan Marsh  
Vice President – Federal Regulatory  
AT&T Services, Inc.  
1120 20<sup>th</sup> Street, N.W.  
Suite 1000  
Washington, D.C. 20036

Re: IRU Divestitures in connection with the AT&T/BellSouth Merger

Dear Ms. Marsh:

The Wireline Competition Bureau and the Enforcement Bureau of the Federal Communications Commission have completed the review of the proposed divestiture of an indefeasible right of use to fiber strands to the buildings listed in Attachment B to Appendix F of the *AT&T/BellSouth Merger Order* and do not object to the proposed divestiture.<sup>1</sup>

This lack of objection is based on a thorough review of all of the information you provided, including the documents submitted and the representations made by you in your letter of July 30, 2007. Our review was conducted consistent with the divestiture framework agreed to in the *SBC/AT&T Consent Decree*.<sup>2</sup>

Sincerely,

Thomas J. Navin  
Chief, Wireline Competition Bureau

Kris A. Monteith  
Chief, Enforcement Bureau

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<sup>1</sup> See *AT&T Inc. and BellSouth Corporation Application for Transfer of Control*, WC Docket No. 06-74, Memorandum Opinion and Order, 22 FCC Rcd 5662, App. F (2007) (providing for the divestiture of facilities) (*AT&T/BellSouth Merger Order*).

<sup>2</sup> See *United States v. SBC Communications, Inc.*, Civil Action No. 1:05CV02102, Final Judgment (D.D.C. filed Oct. 27, 2005).