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October 24, 2006

Ms. Diane Davis, Rules Coordinator
State of Oregon Public Utilities Commission
550 Capitol Street, Northeast-Suite 215
Salem, OR 97301-2551

Re: AR 509, Comments of AT&T Companies Concerning Rulemaking to Amend
Division 016 Rules Governing Interconnection Agreements

Dear Ms. Davis:

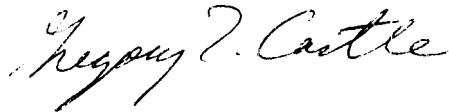
Pursuant to the Notice of Proposed Rulemaking Hearing, dated August 30, 2006, AT&T Communications of the Pacific Northwest Inc., TCG Joint Venture Holdings Inc. d/b/a TCG Oregon, and SBC Long Distance, LLC d/b/a AT&T Long Distance (collectively "AT&T") provide the following comments concerning the proposal to amend rules governing interconnection agreements ("ICAs"). The proposed amendments are intended to expedite the approval process for negotiated ICAs and clarify the rights of parties in arbitration. AT&T supports the Commission's proposal to expedite the approval process of negotiated ICA's by eliminating the formal comment cycle for carriers not party to the ICA. The Commission's proposal will expedite the ICA approval process with little effect on carriers, since it appears carriers rarely file comments concerning ICAs negotiated by other carriers.

AT&T has a limited concern, however, about the proposed change to Oregon Administrative Rule §860-016-0030 concerning the rights of a respondent in an ICA arbitration proceeding. The proposed change would allow a respondent in an arbitration proceeding to file a motion requesting that the Commission dismiss, with prejudice, the petition for arbitration if the petitioner failed to timely prepare and serve an interconnection agreement after the Commission issued a decision in the arbitration. AT&T certainly agrees that a petitioner in an arbitration should not be able to avoid the results of what it may consider an unfavorable decision by not preparing or serving an ICA that conforms to the arbitration decision. AT&T is concerned, however, that the proposed rule inadvertently could produce unjust results.

In AT&T's experience, well-intentioned parties in an arbitration may need more than 14 days to agree upon language to effectuate the results of an arbitration decision. In such cases, the parties may desire to extend petitioner's time for serving the conforming ICA on the respondent. An extension of time under these circumstances works to the benefit of the parties and the Commission by allowing parties to work out differences in a cooperative, rather than adversarial, manner. The proposed rule amendment, if strictly enforced, could make it risky for a petitioner to agree to such an extension because a respondent might then claim the ICA was not timely filed and file a motion to have the arbitration dismissed. To avoid this unjust result, the proposed amendment should be revised to state, "If petitioner, without respondent's consent, fails to timely prepare and serve an interconnection agreement on respondent, respondent may file a motion requesting the Commission dismiss the petition for arbitration with prejudice. The Commission may grant such motion if the petitioner's failure to timely prepare and serve the interconnection agreement was the result of inexcusable neglect on the part of petitioner."

AT&T appreciates the opportunity to comment on the proposed rule changes and requests that the proposed amendment to Rule § 860-016-0030 be modified as discussed above.

Sincerely,

A handwritten signature in cursive script that reads "Gregory L. Castle".

Gregory L. Castle
Senior Counsel
AT&T Services, Inc.

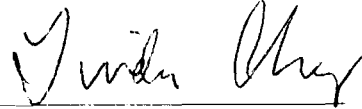
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, (AR509), Comments of AT&T Companies Concerning Rulemaking To Amend Division 016 Rules Governing Interconnection Agreements, on the Oregon Public Utilities Commission by mailing, via overnight delivery, addressed as follows:

Ms. Diane Davis, Rules Coordinator
State of Oregon Public Utilities Commission
550 Capitol Street, Northeast-Suite 215
Salem, OR 97301-2551

and served a copy of the foregoing document by U.S. mail, postage prepaid, on known parties to AR 509, addressed as follows:

Mr. Cameron Nance, Regulatory
Trans National Communications International, Inc.
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