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FRN: 0021140421

October 27, 2011

Application No. 1

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Attention: Wireline Competition Bureau

Dear Ms. Dortch:

Effective November 1, 2011, AT&T Operating Companies (ATTOC) will adopt the AT&T Corp. Tariff F.C.C. No. 1 by reissuing the entire tariff in ATTOC's own name as "AT&T Operating Companies Tariff F.C.C. No. 1 (Advanced Services)," pursuant to § 61.171 of the Commission's Rules.

ATTOC proposes to issue the tariff under the name "AT&T Operating Companies." As proposed, the name "AT&T Operating Companies" will appear on the title page and in the upper left hand corner of each page of the tariff. The official name of the issuing carriers will be Illinois Bell Telephone Company, Indiana Bell Telephone Company, Inc., Michigan Bell Telephone Company, The Ohio Bell Telephone Company, Wisconsin Bell, Inc., Nevada Bell Telephone Company, AT&T Corp., The Southern New England Telephone Company, and Southwestern Bell Telephone Company. This tariff is limited to Advanced Services and does not contain any of the Issuing Carriers' Access Services. As discussed below, pursuant to §§ 61.151 through 61.153 of the Commission's Rules, ATTOC seeks special permission under which the Commission would grant waivers of §§ 61.52(b)(1), 61.54(b)(2), 61.54(a), 61.54(c)(4), 61.54(i), 61.58, 61.74, and 61.171 of the rules in connection with ATTOC's adoption of the tariff.

ATTOC requests waiver of § 61.52(b)(1) to permit it to place the name "AT&T Operating Companies" on each tariff sheet. Since the Issuing Carriers to this tariff will be listed on the Title Page, ATTOC requests a waiver of § 61.54(b)(2) of the Commission's rules. ATTOC will list the exact legal name of the carriers issuing the tariff as the "Issuing Carriers" of the tariff. Waiver of this section of the rules will minimize administrative changes should there be a future change in the corporate form. ATTOC would reflect such a change by updating the list of "Issuing Carriers" rather than modifying each page of the new tariff.

ATTOC requests a waiver of § 61.54(a) to permit ATTOC to include the "Definitions of Terms and Abbreviations" page after the "Reference to Other Publications" page and before Section 1 of the Tariff. This waiver will allow ATTOC to adopt the tariff without changes to comply with § 61.171.

Except for Sections 2.3, 2.12.3, 2.12.4, 2.12.5, 2.12.6, and 2.13.1, ATTOC requests waiver of §§ 61.54(c)(4) and 61.54(i) of the Commission's Rules to permit ATTOC to not use marginal coding or other notations to reflect each page as new material "(N)" as would otherwise be required by these rules. ATTOC does propose changes to the existing Sections 2.3, 2.12.3, 2.12.4, 2.12.5, 2.12.6, and 2.13.1. Therefore, these changes will be appropriately symbolized. All other changes will be non-substantive.

ATTOC requests waiver of § 61.58 of the Commission's Rules to make these changes, including cancelling AT&T Corp. Tariff F.C.C. No. 1, on one day's notice. This waiver is necessary to ensure an effective date of November 1, 2011, which is needed to facilitate changes to the corporate structure.

ATTOC requests a waiver of § 61.74 of the Commission's Rules. This waiver is specifically limited in order to allow ATTOC to continue to reference in the tariff the same existing cross-references for which the Commission has previously granted waivers to AT&T Corp. for its Tariff F.C.C. No. 1.

In accordance with 47 C.F.R. § 61.153, this Application letter and the appropriate illustrative tariff pages are being filed electronically today via the Commission's Electronic Tariff Filing System (ETFS). Payment in the amount of \$845.00 has been electronically transmitted to the US Bank in St. Louis, MO in accordance with the fee program procedures. Form 159 is being transmitted electronically via ETFS. These actions have been committed as the issued (filed) date as reflected above.

In accordance with the requirements of § 61.21(a)(3) of the Commission's rules, the FCC Registration Number (FRN) for ATTOC is 0021140421. ATTOC is making this filing on behalf of issuing carriers with the following FRNs:

Illinois Bell Telephone Company:	0002860856
Indiana Bell Telephone Company, Inc.:	0002904654
Michigan Bell Telephone Company:	0002776771
The Ohio Bell Telephone Company:	0002946986
Wisconsin Bell, Inc.:	0002716561
Nevada Bell Telephone Company:	0005049127
AT&T Corp.	0004496774
The Southern New England Telephone Company:	0003576931
Southwestern Bell Telephone Company:	0016627473

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All correspondence and inquiries concerning this application should be addressed to Debra L. Clemens, Director-Federal Regulatory, 1120 20th Street, N.W., Suite 1000, Washington, D.C. 20036, or by telephone at (202) 457-3066.

Sincerely,

A handwritten signature in black ink, appearing to read "Christi Shewman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Christi Shewman  
General Attorney

Attachments:

Illustrative Tariff Pages