

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

United States of America,)	
)	
Plaintiff,)	Civil Action No.: 1:05CV02102 (EGS)
)	
v.)	
)	
SBC Communications, Inc. and)	
AT&T Corp.,)	
)	
Defendants.)	
)	
)	
United States of America,)	
)	Civil Action No.: 1:05CV02103 (EGS)
Plaintiff,)	
)	
v.)	
)	
Verizon Communications Inc. and)	
MCI, Inc.,)	
)	
Defendants.)	
)	

**UNITED STATES' UNOPPOSED MOTION FOR MODIFICATION OF
THE COURT'S MINUTE ORDER OF AUGUST 15, 2006**

Pursuant to Local Rule 16(b), the United States respectfully requests that the Court modify the submission schedule set out in its Minute Order of August 15, 2006.

At the status hearing on July 25, 2006, the Court gave the United States an opportunity to supplement the record with additional materials for the Court's consideration, setting out a submission schedule that required the United States to file such supplemental materials by August 7, 2006, with responses due August 17, 2006, and replies due August 28, 2006.

The United States filed its supplemental submission on August 7, 2006, within the deadline initially set by the Court. On August 11, 2006, three amici, COMPTTEL, NASUCA, and the Office of the Attorney General of the State of New York, filed a motion requesting an additional four weeks to respond to the United States' submission. On August 15, 2006, the Court granted the amici's motion in part, making responses due on September 5, 2006 and replies due on September 12, 2006. This revised schedule gave all six amici an additional 19 days to file responses, with the United States' reply due one week later.

Amici used this extra time to generate an enormous volume of materials, much of which was served after the close of business on September 5, 2006. All told, the various materials submitted by the six amici total in excess of 2,000 pages. Based upon its initial review, the United States anticipates that the majority of this material will ultimately prove to be irrelevant to the Court's public interest determination. However, the United States cannot reasonably review this volume of materials and respond in a manner that will be helpful to the Court within the allotted period.

In accordance with Local Rule 7(m), the United States conferred with counsel for AT&T, Verizon, ACTel, COMPTTEL, the Office of the Attorney General of the State of New York, the New Jersey Rate Counsel, NASUCA, and Sprint as to whether they objected to this motion. Verizon neither consented nor objected to the motion; every other defendant and amicus responded that they did not oppose the motion.

Accordingly, the United States respectfully requests that the Court extend the deadline for replies by one week, until September 19, 2006.

Respectfully submitted,

/s/
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Assistant Chief

/s/
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