

**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,)	
)	
Plaintiff,)	Civil Action No.: 1:05CV02103 (EGS)
)	
v.)	
)	
Verizon Communications Inc. and)	
MCI, Inc.,)	
)	
Defendants.)	

**OPPOSITION OF THE UNITED STATES TO THE NEW JERSEY RATE COUNSEL’S
“MOTION” TO MODIFY PROTECTIVE ORDERS**

The United States opposes the New Jersey Division of Rate Counsel’s “motion”¹ to modify the Court’s Protective Order entered on July 25, 2006 in relation to the unredacted Federal Communications Commission (FCC) Orders and to modify the pending proposed protective orders in relation to the United States’ submission of materials. We object to Rate Counsel’s motion on the grounds that (1) the Court has not granted it leave to participate in these

¹ The Rate Counsel (also referred to as the Rate Payer Advocate) filed a letter, rather than a motion, with the Court making its request. For convenience, we are referring to it as a motion.

