IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

UNITED STATES' MOTION FOR LEAVE TO FILE A SUPPLEMENTAL RESPONSE

Despite ACTel's three voluminous prior filings (including sixteen exhibits) and the Court's direction that ACTel include in its May 16, 2006 filing any material it wanted the Court to consider, ACTel's June 6, 2006 reply brief includes 11 new exhibits, as well as new information, arguments and citations. The United States seeks leave to file the attached brief response to ACTel's reply in order to explain why these new arguments do not raise any significant issues regarding whether the proposed Final Judgments fall within the public interest.

The response is limited to eight pages and only attempts to respond to new information or arguments made by ACTel.

Pursuant to the requirement of Local Rule 7(m), the United States represents that it has conferred with counsel for ACTel, AT&T, Comptel, and Verizon. AT&T, Comptel, and Verizon do not object to this Motion. ACTel stated that it "does not object . . . so long as the [United States] does not object to ACTel filing a response." Given ACTel's extensive prior filings, and the fact that the United States does not raise any new issues in its proposed Supplemental Response, the United States does not consent to another filing by ACTel.

Respectfully submitted,

/s/
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/s/
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