"It would be difficult to formulate an order that would effectively deal with all of the different kinds of anticompetitive behavior . . . with respect to many different subjects. There is evidence which suggests that AT&T's pattern during the last thirty years has been to shift from one anticompetitive activity to another, as various alternatives were foreclosed through the action of regulators or the courts or as a result of technical development. In view of this background, it is unlikely that, realistically, an injunction could be drafted that would be both sufficiently detailed to bar specific anticompetitive conduct yet sufficiently broad to prevent the various conceivable kinds of behavior that AT&T might employ in the future.[155]"

"[155] For these reasons, and because of the enforcement problems discussed below, courts have generally rejected this type of detailed injunction in favor of the 'surer, cleaner remedy of divestiture.'" *United States* v. *E.I. du Pont de Nemours & Co.*, 366 U.S. 316, 334 (1961). *See also United States* v. *Paramount Pictures, Inc.*, 334 U.S. 131, 165-175 (1948), and *United States* v. *Crescent Amusement Co.*, 323 U.S. 173, 189-190 (1944))."

United States v. *AT&T*, 552 F. Supp. 131, 167-68 & n. 115 (D.D.C. 1982) (Greene, J.)