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January 19, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Assessment and Collection of Regulatory Fees for Fiscal Year 2017, MD Docket
No. 17-134

Dear Ms. Dortch:

On January 17, 2018, Vonda Long-Dillard and the undersigned of AT&T met with Thomas Buckley and Roland Helvajian of the Office of the Managing Director and David Krech of the International Bureau to discuss the proposed regulatory fees for International Bearer Circuits ("IBCs") in the above-captioned proceeding. Carol Bourdette of AT&T and Mika Savir of the Enforcement Bureau participated by conference call.

During the meeting, we expressed AT&T's support for the Commission's proposals to revise the current five IBC regulatory fee tiers for international submarine cable capacity and to apply the revised fee tiers to all international terrestrial and satellite capacity. We also expressed support for the addition of lower fee tiers for providers with small volumes of IBC capacity. We noted our concerns that the two-tier fee for terrestrial and satellite circuits advocated by CenturyLink would not fairly allocate these fees given the disparities in the circuit volumes held by different operators and that such disparities are likely to increase as the result of the Commission's recent decision to apply the IBC regulatory fees to non-common carrier terrestrial circuits.

We also noted our concerns with the proposal by the Submarine Cable Coalition to replace a significant portion of the IBC fees on non-common carrier submarine cables (or all IBC fees for all cables) with a flat fee on international Section 214 authorizations. Such changes would effectively reverse the Commission's decisions to provide a competitively neutral IBC fee structure and would unreasonably burden U.S. international common carrier operators, including resellers which do not own or operate IBC capacity and therefore do not pay IBC fees.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "James Talbot". The signature is written in a cursive, slightly stylized font.

James J.R. Talbot
Assistant Vice President – Senior Legal Counsel

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cc: Thomas Buckley
Roland Helvajian
David Krech
Mika Savir