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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Rules for the Filing of International)
Circuit Status Reports)

CC Docket No. 93-157

TO: THE COMMISSION

COMMENTS OF GTE

GTE Service Corporation, on behalf of its affiliated telephone operating companies and satellite service company ("GTE Spacenet") (collectively, "GTE"), hereby submits its Comments on the Commission's Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding, FCC 93-291, released July 2, 1993. GTE Hawaiian Telephone Company ("HTC") is currently the only GTE company required to file monthly international circuit status reports.

Based on significant changes that have taken place since the inception of the monthly circuit status reporting requirement, the Commission is proposing to: "(1) codify in the Commission's Rules, requirements for the filing of international circuit status reports; (2) reduce the frequency of filing such reports from monthly to annually; (3) require all facilities-based international carriers to file such reports; (4) provide for a filing manual with reporting instructions; (5) specify a format for the filing of those reports; and (6) require the filing of such reports on computer diskettes."¹ This report is to consist of: "(1) the number of circuits in each transmission facility an international

¹ See NPRM at ¶1. (Footnotes omitted.)

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carrier has activated for international message telephone, private line and telegraph grade services; (2) the number of idle circuits; (3) and the total number of circuits authorized or activated."²

DISCUSSION

GTE supports the Commission's proposals especially reducing the filing requirement from monthly to annually. This specific proposal would reduce the burden both on international carriers submitting the reports and the Commission staff required to process the reports while still providing sufficient information for the Commission to act on Section 214 applications, assess applications for new international facilities, monitor international services and analyze international industry trends.³ Formalizing format and reporting requirements and providing an instruction manual make it easier for carriers to prepare reports and provide consistency among all carriers.

The NPRM proposes that all facilities-based international common carriers⁴ would be required to file an annual circuit status report. GTE Spacenet, though previously not required to submit a monthly circuit report, would under this proposal be required to file an annual report. This report, however, would contain the same information GTE Spacenet is required to file in two other reports.

Currently, all international common carriers including GTE Spacenet are required under Section 43.61(b) of the Commission's rules to submit an annual report on July 31

² *Id.* at 1 n.1.

³ *Id.* at ¶3.

⁴ The NPRM defines facilities based common carriers "as those international common carriers which acquire international transmission facilities on an ownership or indefeasible right of use basis or lease satellite capacity from Comsat or a separate satellite system." *Id.* at 1 n.2.

detailing the number of leased private line circuits by country and service category and the total revenue. Since GTE Spacenet does not provide International Message Telephone Service ("IMTS"), telex, or any other international services, the 43.61 report provides all the circuit information for GTE Spacenet's international services. In addition, GTE Spacenet, as a nondominant international carrier, is required under Section 63.10(b) to file semi-annual circuit addition reports indicating the international circuits added, the country served, and the service provided. Thus, international carriers like GTE Spacenet, who provide only international private line services, provide similar information on both reports, although not in the same format. This information would be duplicated in the report required by the NPRM. The Commission should consider eliminating redundant reporting requirements for international common carriers like GTE Spacenet.

GTE also suggests that the proposed 43.82 report should require that capacity be reported in equivalent 64 kbps circuits rather than equivalent voice-grade circuits to reflect the transmission of both voice and high speed data. This would provide a more accurate reporting of circuit capacity than voice grade equivalency especially with the increasing importance and frequency of data transmissions.

Finally, GTE believes that the information reported on the international circuit status report should be treated as confidential since it would provide competitors access to highly competitive information. Other U.S. carriers, as well as foreign competitors, can use the information for their own business purposes. In an increasingly competitive atmosphere of international telecommunications, it is vitally important that specific route information including the number of active and idle circuits should not be available to competitors. Competitors can use this information to determine a carrier's routes, how traffic is routed, the capacity currently used to provide service and the readily available surplus. While the Commission may need access to this information in order to make informed decisions regarding international services,

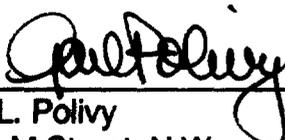
this information should not be made available to competing carriers possibly to be used to gain a competitive advantage. In light of the competitive sensitivity of the information provided, international circuit status reports should be treated by the Commission as confidential and not routinely available to the public.

CONCLUSION

GTE supports the Commission's proposal to reduce international common carrier reporting requirements while still collecting adequate information to make valued judgments regarding international telecommunications. GTE suggests, as an extension of its efforts to streamline reporting requirements, that the Commission eliminate redundant reporting, require circuits to be reported in equivalent 64 kbps rather than equivalent voice-grade circuits and accord confidential treatment for competitive circuit information.

Respectfully submitted,

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