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September 1, 1993

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Stop Code 1170
1919 M Street, N.W.
Washington, D.C. 20554

Re: Rules For the Filing of International
Circuit Status Reports
CC Docket No. 93-157

Dear Mr. Caton:

Enclosed for filing with the Commission are an original and four copies of the Comments of American Telephone and Telegraph Company in the above-referenced proceeding.

Kindly acknowledge receipt of this document by date-stamping the extra copy furnished herewith for that purpose and returning a copy to bearer.

Very truly yours,

Michael Andre Dennella

cc: Mr. Robert E. Gosse

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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) CC Docket No. 93-157
Rules For the Filing of International)
Circuit Status Reports)

COMMENTS OF AT&T

American Telephone and Telegraph Company ("AT&T") files these Comments, pursuant to the Commission's Notice of Proposed Rulemaking ("NPRM"), released July 2, 1993. AT&T supports the Commission's proposals included in the NPRM, subject to the affected carriers being afforded a reasonable opportunity to provide input into the development of the proposed filing manual, and a clarification that IMTS and private line remain the relevant service categories for Circuit Status Reports.

Background

In the NPRM, the Commission proposes 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.

As the Commission points out in the NPRM, the circuit status reports filing requirement was implemented in the early 1970s and applied to the U.S. international carriers in existence at that time.¹ No such reports have been requested of the approximately fifty additional facilities-based U.S. international carriers which have come into existence since then.² AT&T is one of the seven carriers identified by the Commission, which currently files monthly Circuit Status Reports. AT&T has filed detailed reports since the requirement originated.

Discussion

For the reasons of efficiency, consistency among carriers, and usefulness of information for today's regulatory and market environment, as set forth in the NPRM, it is appropriate for the Commission to codify the Circuit Status Reports filing requirement. Codification will not only help to ensure that the Commission receives consistent information from all relevant carriers, but it will assist carriers in complying with the filing requirement.

¹ NPRM, p. 2.

² NPRM, p.2, n.3, p.5, App. A.

Given that regulatory changes as well as changes in the nature of the international telecommunications industry have occurred since the origination of the Circuit Status Reports filing requirement, it is now appropriate to eliminate unneeded information and reduce the filing to once per year. AT&T's experience has been that, in dealing with a dynamic international network such as its own, the monthly filing requirement presents considerable time pressures, with uncertain attendant benefits. Now that the Commission has confirmed that it has no need for the information, except on an annual basis, the public interest requires that the Commission follow through with its proposal of reducing the frequency of the filing requirement to once annually.

If Circuit Status Reports are to be meaningful to the Commission for the purposes identified in the NPRM, i.e., determining use of existing cable and satellite facilities, determining whether a carrier is providing direct or indirect service to countries, and assessing industry trends in the use of international transmission facilities, then such reports should be filed by all of the U.S. international facilities-based carriers--as is proposed in the NPRM.

AT&T supports the proposed development of a filing manual by the Chief of the Commission's Common Carrier Bureau. Such a manual could be the vehicle setting forth details with respect to filing Circuit Status Reports. AT&T

suggests that this manual be developed with input from the affected carriers. Such input will enhance the likelihood that, to the extent consistent with the final rule, details of the filing requirements are designed in a way affording maximum efficiency to the Commission Staff and the affected carriers. A further benefit of including filing requirement details in a filing manual rather than embodied in an additional rule, is that a filing manual could be promptly updated as necessary. Such updating could occur with commensurate public input, but without the time and expense of a full rulemaking proceeding.

The NPRM proposal that the filing manual specify a format for the reports will ensure that carriers provide Circuit Status Reports in a format that will be useful to the Commission. We suggest that this format be developed with input from affected carriers, so that efficiencies can be realized by carriers providing reports, as well as by the Commission Staff.

One detail of the format of the Circuit Status Reports that can be addressed at the outset however, is a clarification of the relevant service categories. Section 43.82(b) of the proposed rule requires that certain information be provided for each of the "specified services". The proposed rule does not identify service categories nor does the NPRM indicate any intent to create new service categories for purposes of the Circuit Status

Reports. AT&T recommends, therefore, a clarification (perhaps in the filing manual) that the expression "specified services" continues to refer to the currently used service categories of IMTS and private line for purposes of the Circuit Status Reports. IMTS and private line are the service categories AT&T has identified in its monthly Circuit Status Reports in accordance with the Commission's most recent instructions on the format of monthly Circuit Status Reports.³

AT&T supports the proposal that reports be filed on computer diskettes. We would hope that this objective can be accomplished without the need for carriers to invest in additional computer software or hardware. In that regard, we propose that filing carriers be afforded options as to the software to be utilized for such reports. Absent that, we would propose that any designation of software be made in consideration of input by the affected carriers. Software options and requirements could be part of the of the details to be included in the proposed filing manual.

³ See April 9, 1981 letter of Mr. William F. Adler, Chief, FCC International Facilities Authorization & Licensing Division to Mr. E. E. Carr, AT&T, No. 61100.

Conclusion

AT&T supports the proposals included in the NPRM and recommends their implementation, subject to a reasonable opportunity for input by affected carriers on matters of details with respect to the proposed filing manual, and clarification that IMTS and private line are the relevant service categories for purposes of the Circuit Status Reports. AT&T believes implementation of such proposals will result in useful efficiencies for the Commission, the affected carriers, and will serve to benefit the public interest. AT&T is prepared to work with the Commission Staff in developing an appropriate filing manual.

Respectfully submitted,
AMERICAN TELEPHONE AND TELEGRAPH COMPANY

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September 1, 1993

CERTIFICATE OF SERVICE

I, Catherine Houston, do hereby certify that a copy of American Telephone and Telegraph Company's Comments, dated September 1, 1993, has been sent by United States mail, postage prepaid, to the following:


Catherine Houston

Dated: September 1, 1993

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