and foreign carriers and (ii) encourage expansion of the global network.[12] However, there is no evidence that either assertion is actually true.

Even if it can be assumed that lower accounting rates would lead to lower U.S. calling charges, an assumption disputed by clear evidence, it has not been demonstrated that international calling patterns are demand elastic. The Commission cites the U.S. domestic experience, but the U.S. domestic market is very different from the international market. Even if it is true that international services are price elastic in the U.S. market, it does not necessarily follow that international services are similarly elastic in foreign markets where other factors, including demographics and disposable income, come into play.

Generally speaking, it may be true that markets for international services are growing. But this may be due to general increases in disposable income, increased availability of telephone facilities, reduced blockage due to improved service quality and increased digitalization. HKTI submits that the Commission has not made a general case, and that one probably cannot be made, that above cost accounting rates are restricting the growth of IMTS and that significant traffic stimulation would result from reductions in accounting rates.

2. No Specific Potential Anticompetitive Behavior By Foreign Companies Is Identified

The Commission indicates that it is important to reduce above cost accounting rates to eliminate a source of subsidies for foreign monopoly carriers to fund anticompetitive behavior through affiliates in U.S. markets. Not only is the potential relationship between above cost accounting rates and any such anticompetitive behavior totally attenuated, unsupported and speculative, but the proposed remedy is inappropriately indirect and overbroad.

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[12] Notice at ¶ 10.

First, there has been no demonstration that foreign carriers are in fact receiving significant "transfer payments" through settlements. In fact, a proper calculation of net settlements, correcting for the diversion of direct revenues to U.S. carriers as a result of refile, call back and other reverse charge services, may show that deficits are actually incurred by foreign carriers.

Second, cross subsidies can always be effected by any company to affiliates through profits. There is no way that the Commission could effectively separate out the specific effects of above cost accounting rates (even if they did result in transfer payments). Nor could the Commission actually curb anticompetitive behavior that may be funded through profits from other sources.

Most importantly, the Commission has not included consideration of potential anticompetitive activities of U.S. carriers. As mentioned herein, "dumping" practices in foreign markets are funded by revenues from reverse charge services, as well as higher than warranted charges on U.S. consumers.

3. Delays in Foreign Regulatory Liberalization Have Not Been Shown To Be Due To Above Cost Accounting Rates

The Commission generally asserts that, as long as accounting rates remain above cost, and foreign monopolies can reap subsidy profits, they will have little incentive to introduce domestic competition.[13] This is a gross generalization and oversimplification.

Every administration, even the U.S., takes many factors into account in its decisions to introduce telecommunications reforms. In any country, decisions to authorize competition in various services, to set rates at certain levels and to require and/or permit certain subsidies

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[13] Notice at ¶ 23.

must accommodate complex policy concerns. As the Commission is well aware, these decisions are multifaceted and difficult.[14]

In Hong Kong the level of accounting and settlement rates is not by any means the predominant factor in determining the timing, or terms and conditions of, competitive entry in international services. In fact it is quite the opposite. The Hong Kong regulator, OFTA, requires that the delivery fee from international calls help support the development of local service and national network expansion. This fee essentially serves as a floor, below which international accounting rates cannot fall without HKTI incurring an actual loss on international calls. Thus it is domestic sector policy, a matter wholly within the sovereign prerogative of Hong Kong's regulatory authorities, which constrains accounting rate reductions beyond a certain level.

C. The More Appropriate Direct Focus Of FCC Concern is U.S. Collection Rates

The appropriate focus of regulatory attention, as stated by the FCC, is the international collection rates actually charged by U.S. carriers to U.S. consumers. It is these rates which have a direct effect on the U.S. consumer, and it is such rates that are directly and indisputably within the jurisdiction of the Commission. If the Commission believes that U.S. international collection rates are not at the level they should be, then it is to those rates, not accounting rates, that the Commission should direct its regulatory attention.

In fact, viewed properly, settlements paid according to accounting rates are merely an expense incurred by carriers and recovered through rates. In the context of a ratemaking proceeding, the Commission may "impute" lower settlement payments based upon what it

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[14] The FCC, for example, has been much slower in opening international simple resale (ISR) than the U.K., Australia and Sweden. ISR will, however, increase competition and lower collection and accounting rates, the very objectives that the FCC contends are its goal.

may consider to be more appropriate accounting rates on each route. The practical effect of such an approach is merely that the carrier must change entries in its books of account to show that "excess" settlements payments are "below the line" and not recoverable through customer charges.[15] This approach, which is commonly taken domestically with respect to contractual arrangements between regulated carriers and unregulated subsidiaries, is the most appropriate analog to international settlement arrangements. In both cases, U.S. carriers enter into contracts with entities not subject to the FCC's jurisdiction. In such cases, the FCC appropriately ignores the "price" of the transaction and instead limits its action to what it in fact has jurisdiction to regulate, namely charges to ratepayers.

HKTI submits that the Commission should be concerned with the relationship between what U.S. carriers charge their own customers as well as the expenses incurred by carriers in paying settlements to foreign correspondents. First, as accounting rates do decline, as those to Hong Kong are already scheduled to do, the Commission should ensure that U.S. customers in fact benefit from a direct flow through of such reductions.[16] Also, given the

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[15] See, e.g., Separation of Costs of Regulated Telephone Service from Costs of Non-Regulated Activities, 2 FCC Rcd 1298, 1304 (1987).

[16] In a recent letter to FCC Chairman Reed Hundt, several members of the Committee on Commerce of the U.S. House of Representatives specifically addressed the attention of the Commission, as well as to U.S. carriers, on this issue:

> The Commission's work to reduce settlement rates to cost is vitally important to U.S. consumers, in addition to telecommunications providers. Therefore, we intend to monitor whether settlement rate reductions are resulting in consumer price reductions. The Commission should make future settlement rate reductions contingent on real reductions in consumer prices. Telecommunications providers should know that further Commission action in this area is dependent, in part, on the extent to which cost savings derived from the Commission's settlement rules are passed on to their consumers.

(continued...)

anomaly of at least the last 5-6 years of rising US collection rates and declining accounting rates, the FCC should impose "benchmark" collection rates, rather than accounting rates, on U.S. carriers. U.S. carriers should not be permitted to unreasonably increase their profits by merely pocketing the savings and keeping customer rates unnecessarily high.

Second, the Commission should not permit U.S. carriers to "dump" international services into foreign markets below cost, i.e. the settlement rate. Such practices do as much to distort traffic imbalances and essentially constitute marketplace abuses by U.S. carriers.[17]

IV. THE COMMISSION LACKS JURISDICTION TO IMPOSE CHANGES IN ACCOUNTING RATES UNILATERALLY

A. The FCC Has No Authority to Prescribe Matters Within the Jurisdiction of a Foreign Administration Or Which Under International Law Are To Be Determined Bilaterally

1. International Law Requires Accounting Rates To Be Set Bilaterally

According to international agreement as articulated in the International Telecommunications Union (the "ITU") Treaty, accounting rates are to be determined by mutual agreement.[18] Unilateral prescription by any administration is anathema to this

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[16](...continued)
Letter of January 29, 1997 to Reed Hundt from Congressmen Tom Bliley, Chairman, Commerce Committee; John D. Dingell, Ranking Democratic Member; W.J. "Billy" Tauzin, Chairman, Subcommittee on Telecommunications, Trade and Consumer Protection; Michael G. Oxley, Chairman, Subcommittee on Finance and Hazardous Materials, p. 3.

[17] In the case of Hong Kong, such practices constitute unfair competition as such services are not subject to the national delivery fee, which serves as an absolute collection rate floor for HKTI.

[18] See Article 6.2.1, International Telecommunication Regulations (Melbourne, 1988):

> For each applicable service in a given relation, administrations shall by mutual agreement establish and revise accounting rates to be applied between them, in accordance with the provisions of [these Regulations] and taking into account relevant CCITT Recommendations and relevant cost trends. (Emphasis added.)

international obligation for mutuality.[19] Thus, because the Commission's jurisdiction over foreign or international communications is limited to the U.S. side of the service, and because ITU law expressly requires mutuality with respect to accounting rates, the Act cannot be read to confer on the Commission the authority to prescribe international settlement rates.[20]

2. The Commission Lacks Statutory Authority to Regulate The Foreign End of International Circuits

The Notice constitutes an unprecedented claim by the Commission as to the breadth of its jurisdiction. While the Commission notes at numerous places the bilateral nature of international telecommunications, its proposed actions clearly ignore that aspect of the issue. The entire thrust of the Notice is direct determination by the Commission for each country and/or foreign carrier specific rates for terminating U.S. originated traffic.[21] In that regard,

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[19] HKTI also submits that the Commission's discretion in this regard is subject to the obligations of the U.S. as signatory to the ITU Convention, and should be formally reviewed in an opinion by the U.S. State Department.

[20] The Commission's reliance on the laws of the ITU as support for its position is misplaced. The Commission notes that both the ITU Constitution and Regulations allow member nations to authorize carriers to enter into "special mutual arrangements" with respect to international telecommunications matters not of interest to members in general and otherwise covered by ITU law. Notice at ¶ 6 & n.5, citing Article 9, International Telecommunication Regulation (Melbourne, 1988), and Article 31, Constitution of the International Telecommunication Union (Nice, 1989). These provisions, the Commission argues, indicate that member nations are not "compelled by the international legal regime" to establish accounting rates bilaterally. Notice at ¶ 6 & n.5

[21] The Commission maintains that its proposed actions are aimed only at U.S. carriers. E.g., Notice at ¶ 19. However, the entire focus of the Commission's proposals is on foreign carriers and regulatory issues, including country-specific costs and country - specific transition periods to mitigate adverse impacts in foreign markets. E.g., Notice at ¶¶ 24, 39-74. In stark contrast, the Notice is nearly devoid of discussion on issues that unquestionably are within its jurisdiction, including determination of U.S. benchmark termination costs to be used by U.S. carriers in negotiations with foreign

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the Notice clearly states that its proposals "will require substantial adjustments for many countries . . . ."[22] The Commission asserts jurisdiction for such actions under Sections 1, 4(i), 201-205 and 303 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. §§ 154(i), 201-205 and 303. HKTI respectfully disagrees that the Commission's actions can be properly classified as directed at U.S. carriers or that the cited provisions of the Act provide jurisdiction for the actions contemplated.

While the Commission does have the authority to regulate generally "foreign communication by wire and radio," 47 U.S.C. § 152(a), the Act does not confer on the Commission plenary jurisdiction over matters that are within the jurisdiction of foreign administrations, the Commission itself has long acknowledged that authority over the foreign end "resides in the particular foreign correspondent."[23] The Commission recently

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[21](...continued)
carriers. The Commission addresses the relationship between its proposed policies and U.S. carrier pricing policies only in one brief paragraph, and in doing so reveals that the connection between its proposals and U.S. consumer interests may be very weak. Notice at ¶ 91. Therefore, notwithstanding assertions to the contrary, the Commission's focus in this proceeding is in fact directly aimed at foreign half circuits and use of accounting rate reform to force changes in carrier practices and regulatory policies in foreign countries, and not at modifying U.S. carrier practices for U.S. consumer benefit.

[22] Notice at ¶ 25.

[23] Uniform Settlement Rates, 84 F.C.C.2d 121, 122 (1980). See also Regulation of International Accounting Rates, 7 FCC Rcd 559, 561 (1991) ("Because the international communications market involves a cooperative effort of service providers in two different countries, the provider at the foreign end, or the government under whose jurisdiction the foreign provider operates, has the power to facilitate or impede the success of a U.S. international resale policy"); AT&T, 88 F.C.C.1630, 1638 (1982) ("In the case of oversees facilities, however, the facilities are jointly owned by United States interests and their foreign correspondents who are beyond our jurisdiction.")

acknowledged the necessity, as a matter of international comity, that its international policies take into account different regulatory frameworks of foreign jurisdictions.[24]

The Commission cannot rely on the expansive and general power conferred by section 4(i) of the Act, 47 U.S.C. § 154(i), to authorize its actions. Section 4(i) gives the Commission the authority to make rules and issue orders "as may be necessary in the execution of its functions" in connection with the regulation of the communications industry. 47 U.S.C. § 154(i). However, such powers are not infinitely broad.[25] The Commission's authority must be exercised within and be consistent with its statutory framework.[26]

Neither do Sections 201-205 of the Act give the Commission the necessary jurisdiction. These Sections give the Commission powers to regulate rates, but do not themselves confer jurisdiction. Also, nothing in the Act can be read to suggest that Congress gave the FCC the right to "regulate" foreign carriers' foreign operations. While certainly the Sections apply to "foreign communications," the Commission consistently has defines foreign communications as a "half-circuit."

In evaluating an agency's interpretation of its own organic statute, the Courts have considered whether the interpretation under review is a novel one or a long-held view. In fact, over the entire 60-year history of the FCC's involvement in accounting rates, beginning with the 1936 decision in Mackay Radio and Telegraph Company, Inc., 2 F.C.C. 5892

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[24] VIA USA Ltd, 9 FCC Rcd at 2292.

[25] American Tel. and Tel. Co. v. F.C.C., 487 F.2d 865, 876 (2d Cir. 1973).

[26] AT&T, 487 F.2d at 877 ("in exercising authority pursuant to Sections 4(i), 4(j), or 403, the Commission's action must not be inconsistent with Sections 203-205").

(1936), the agency has been careful to avoid making any assertion of total jurisdiction and has permitted accounting issues to be determined on a bilateral basis.[27]

Nor does Section 303(r) of the Act give support to the Commission's jurisdictional assertions. The text of the Section makes plain that the authority granted is limited to where the FCC has been granted jurisdiction elsewhere in the Act. Similar to Section 4(i), Section 303(r) is not a grant of authority.

B. Even if Jurisdiction Were Proper The Commission Would Have to Conduct Hearings To Prescribe Accounting Rates

Even if the Commission had authority under Sections 201-205 of the Act to regulate settlement arrangements and prescribe accounting rates, proper exercise of such authority would require evidentiary hearings. It has long been held that there is nothing in the Act that permits the FCC to evade this necessity for a hearing.[28] Consequently, the FCC could not set accounting rates by rulemaking, and would be required to hold evidentiary hearings.

C. The Commission May Not Condition Section 214 Authorizations As Proposed

The Commission proposes to condition authorizations granted to foreign companies or their affiliates under Section 214 of the Act, 47 U.S.C. § 214 on the achievement of "cost based" accounting rates. The Commission suggests that such conditions would be applied in the event that it is determined that existing accounting rates cause "distortions" in the international market place. HKTI submits that such policy could not be applied in a fair and uniform way and it would thus be arbitrary and capricious.

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[27] In fact, the FCC completely resisted such interference even during the long and very difficult dispute last year between AT&T and Telmex concerning accounting rate renegotiations.

[28] AT&T, 487 F.2d 865.

In particular, the Commission cannot determine "distortions" in the international marketplace solely on the basis of the level of accounting rates. As described herein, "distortions" in the form of traffic imbalances are caused by a myriad of factors which may only indirectly be related to accounting rates. Even so, there is no evidence that distortions are caused by the absolute level of accounting rates, i.e., accounting rates above cost, even though traffic imbalances may be due, in part, to asymmetries in accounting rates. Any assessment of distortions must take into account the entire set of interrelated factors that may give rise to uneconomic incentives and behaviors, including, in some cases, the Commission's own international settlements policies.[29]

D. The Proposed Unilateral Enforcement Actions Are Improper

For the reasons discussed above as to the Commission's lack of jurisdiction and authority to prescribe accounting rate reductions, the Commission also lacks jurisdiction and authority to enforce such prescriptions as proposed.[30]

V. THE COMMISSION'S PROPOSED BENCHMARK COSTING METHODOLOGY IS INAPPROPRIATE

The Commission's selection of TSLRIC as a costing methodology for benchmarks is improper. This is a costing methodology based upon the one proposed to be applied by the Commission in its own domestic interconnection proceeding.[31] The proposed use of this

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[29] See Policy Statement on International Accounting Rate Reform, 11 FCC Rcd 3146, 3150 (1996); Regulation of International Accounting Rates, CC Docket No. 90-337, Phase II, Fourth Report and Order, FCC 96-459 (re. December 3, 1996), at ¶¶ 10-14.

[30] Notice at ¶¶ 87-90.

[31] Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, First Report and Order, 11 FCC Rcd 15499 (1996), Order on Reconsideration, 11 FCC Rcd 13042 (1996), petition for review pending and partial stay granted, sub nom. Iowa Utilities Board et al. v. F.C.C., No. 96-3321 and consolidated cases (8th Cir., Oct. 15,

(continued...)

methodology is merely further evidence that the Commission's effort to unilaterally set new accounting rates are ill advised.

As the history of the Commission's own struggles with cost allocation makes clear,[32] there is no objective solution to the problem of allocation of joint and common costs. This is an issue that is deeply imbued with social policy. In fact, the U.S. FCC, as well as administrations all over the world, continue to struggle with the best means of allocating joint and common costs to achieve policy objectives such as affordability as well as economic efficiency and to achieve "proper" balance among local, national long distance and international services. Solutions to these issued that are deemed appropriate in the U.S. may not be considered suitable by policy makers in other countries.

Very few administrations have had the opportunity to examine cost allocation issues to the same extent as the Commission. The Commission's proposal is useful in that it represents the decades of experience the Commission has had on these issues. Nonetheless, each country is entitled to examine these issues from their own perspective. If there is to be one cost allocation methodology utilized to set "cost-based" accounting rates worldwide, it should be arrived at through joint discussions and efforts among all interested nations, and not dictated by the U.S. Thus, unilateral prescription of bilateral accounting rates based upon the use of this particular costing methodology is clearly improper. The ITU is a much more appropriate forum for deliberation of such issues.

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[31](...continued)
1996), partial stay lifted in part, Iowa Utilities Board et al. v. F.C.C., No. 96-3321 and consolidated cases (8th Cir., Nov. 1, 1996).

[32] See, e.g., AT&T, 61 FCC 2d 587 (1976); recon. denied, 64 FCC 2d 971 (1977), further recon., 67 FCC 2d 1441 (1978), aff'd in part sub nom. Aeronautical Radio, Inc. v. F.C.C., 642 F.2d 1221 (D.C. Cir. 1980), cert. denied, 451 U.S. 920 (1981)(examining and comparing several different cost allocation methodologies).

Similarly, reliance upon AT&T estimates of "average network cost" as a "starting point" for estimation of incremental costs is improper.[33] Even if all administrations agree to the use of some form of incremental cost, there is no assurance that AT&T's estimate is relevant. AT&T is the party with the greatest vested interest in this proceeding, and has every incentive to underestimate these costs. Thus, AT&T's estimates of incremental cost should be considered only with the greatest skepticism, and should not be accepted without thorough investigation.[34] Thus, the Commission cannot purport to have a reliable basis to develop incremental cost proposals.

VI. THE COMMISSION SHOULD ACT THROUGH APPROPRIATE INTERNATIONAL CHANNELS

As discussed above, unilateral action by the Commission along the lines of its proposal will not achieve the desired objectives, and in fact may help to aggravate certain problems in the international settlements process. It has been demonstrated that settlement outpayments are due, in large measure, to traffic imbalances that are generated and aggravated by the practices of U.S. carriers themselves. Further accounting rate reductions in the manner proposed in this proceeding will only further serve the interests of U.S. carriers, to the detriment of U.S. ratepayers and the international settlements process generally.

It is clear that unilateral action by any nation will not further the cause of either international comity or mutual development of the industry. While the process of negotiating

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[33] Notice at n.57.

[34] As made evident in the Notice, AT&T supplied its estimate only days before the Notice was adopted. Clearly, the Commission staff had no opportunity to review or evaluate the reasonableness of this estimate. The Commission's acceptance at face value of such an estimate from AT&T is highly unusual.

international accounting rates can be frustrating, the process has been designed through multilateral discussion under the aegis of the ITU, to which almost all countries are signatories.[35]

HKTI believes that an appropriate way forward would be to form a special Study Group within the ITU to review international accounting rates and settlement practices, and to determine whether the current system may be replaced by a structure which more accurately reflects the tariff structures existing in networks worldwide.[36] Without wishing to prejudge the outcome, one solution which addresses the various stages of development would be one which reduces settlement payments as tariffs tend toward balance in the terminating country. National entities would set their own inpayment requirements.

This approach would rightly involve discussion with all countries, and would allow a rational way forward agreed by all, rather than a unilateral declaration which would infringe the rights of sovereign nations to determine how their own telecommunications systems are to be developed.

In any event, HKTI stands ready to fully participate in, and contribute information to, any appropriately constituted multilateral effort to address the issues raised by the Commission in the Notice.

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[35] HKTI notes that ITU Secretary General Pekka Tarjanne in fact has invited comments to be submitted to the ITU on accounting rate issues for reference in Study Group 3 meetings to begin in May 1997. Especially as the meetings in this more appropriate forum are already scheduled for the very near future, the apparent urgency of the need for unilateral action by the U.S. seems false.

[36] In the Notice, e.g. at ¶¶ 15 and 17, the Commission notes the current widespread interest and efforts in international fora to address settlement rate reform. It is particularly curious given the Commission's acknowledgment of these multilateral efforts already underway that the Commission believes that unilateral action is more appropriate and productive.

VII. CONCLUSION

For the reasons stated, HKTI believes that the Commission should not adopt its proposals to set accounting rate benchmarks and unilaterally mandate accounting rate reductions. Instead, HKTI recommends that the Commission work within proper multilateral processes to address international settlements issues across a wide range of issues and with appropriate international participation.

Respectfully submitted,

HONGKONG TELECOM INTERNATIONAL

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February 7, 1997

CERTIFICATE OF SERVICE

I, Aileen A. Pisciotta, hereby certify that I have served a copy of the foregoing "Comments of Hongkong Telecom International" on this 7th day of February, 1997, upon the following parties by hand delivery:

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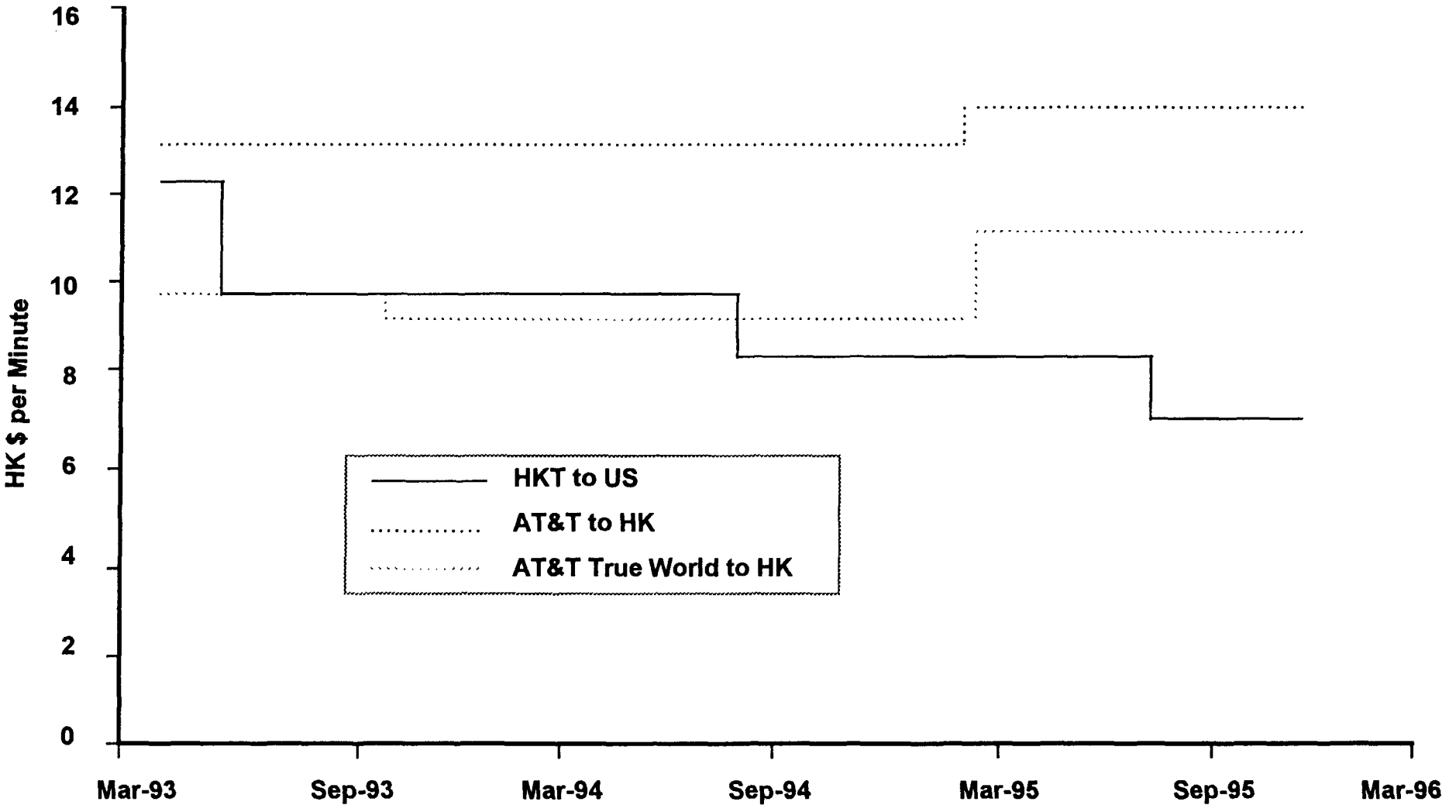
APPENDIX A

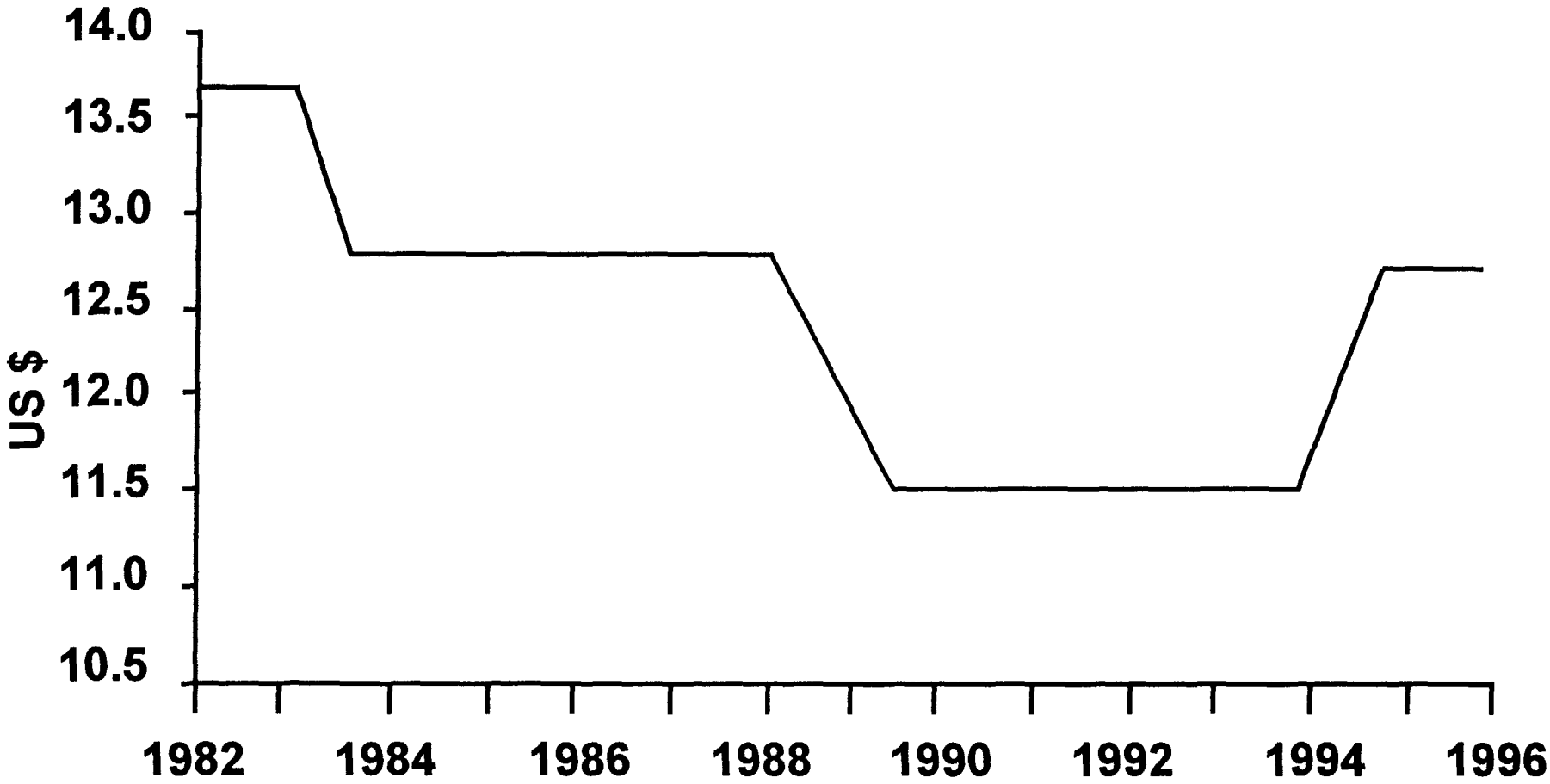
COMPARISON OF HONGKONG TELECOM INTERNATIONAL AND AT&T COLLECTION RATES

Rates for Trans-Pacific Calls

Chart 1



AT&T Rates for Direct-Dialed Calls to Hong Kong Lasting 7 Minutes During The Standard Rate Period (1982 - 1996)



Source - FCC International Trends Report, August 22, 1996

AT&T Discount Rates for Direct-Dialed Calls to Hong Kong Lasting 7 Minutes (1990 - 1996)

Source - FCC International Trends Report, August 22, 1996

APPENDIX B

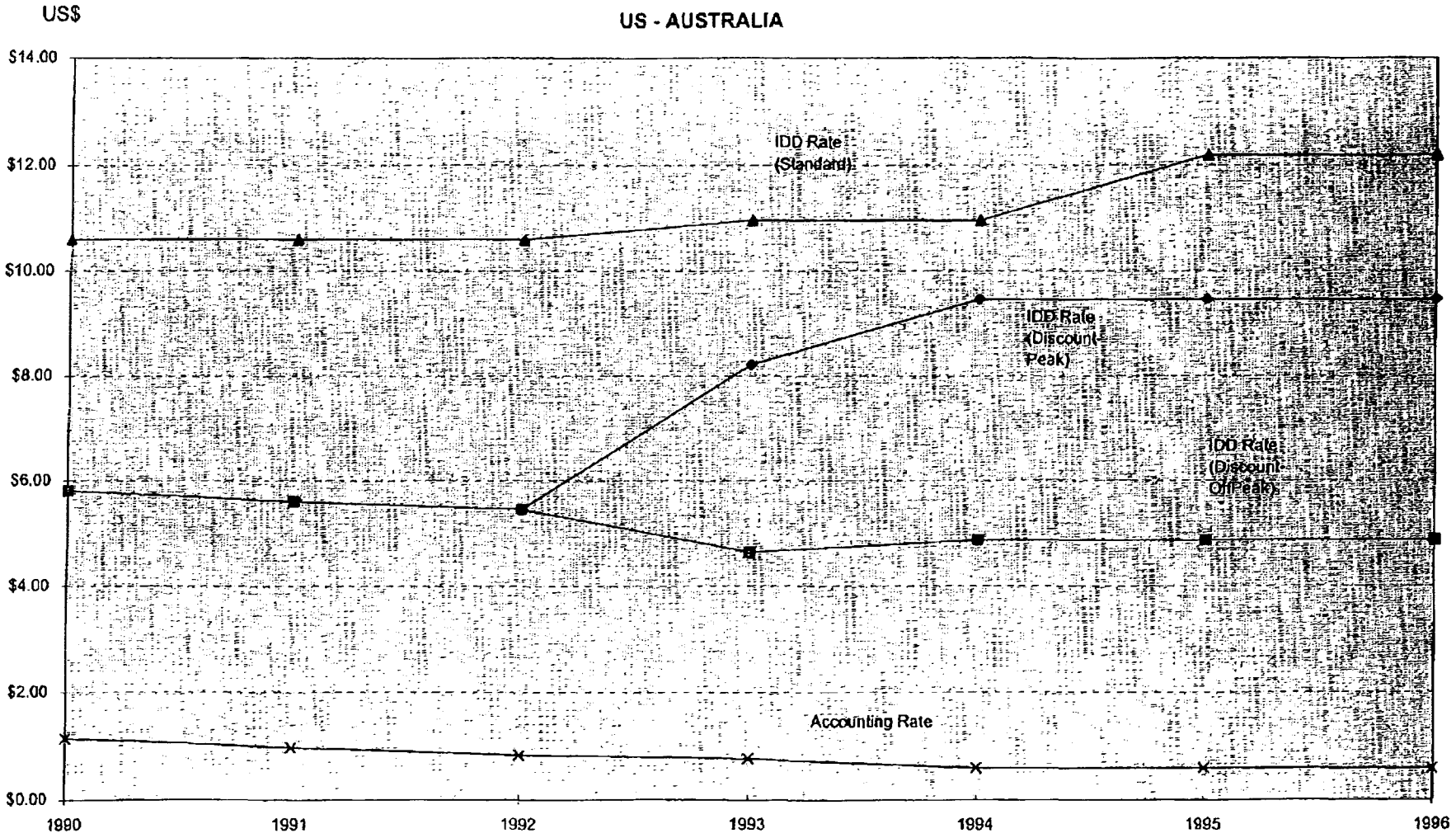
COMPARISON OF CHANGES IN COLLECTION RATES AND ACCOUNTING RATES FOR VARIOUS COUNTRIES

IDD Standard RateAccounting Rate
1990/19961990/1996
% Difference% Difference

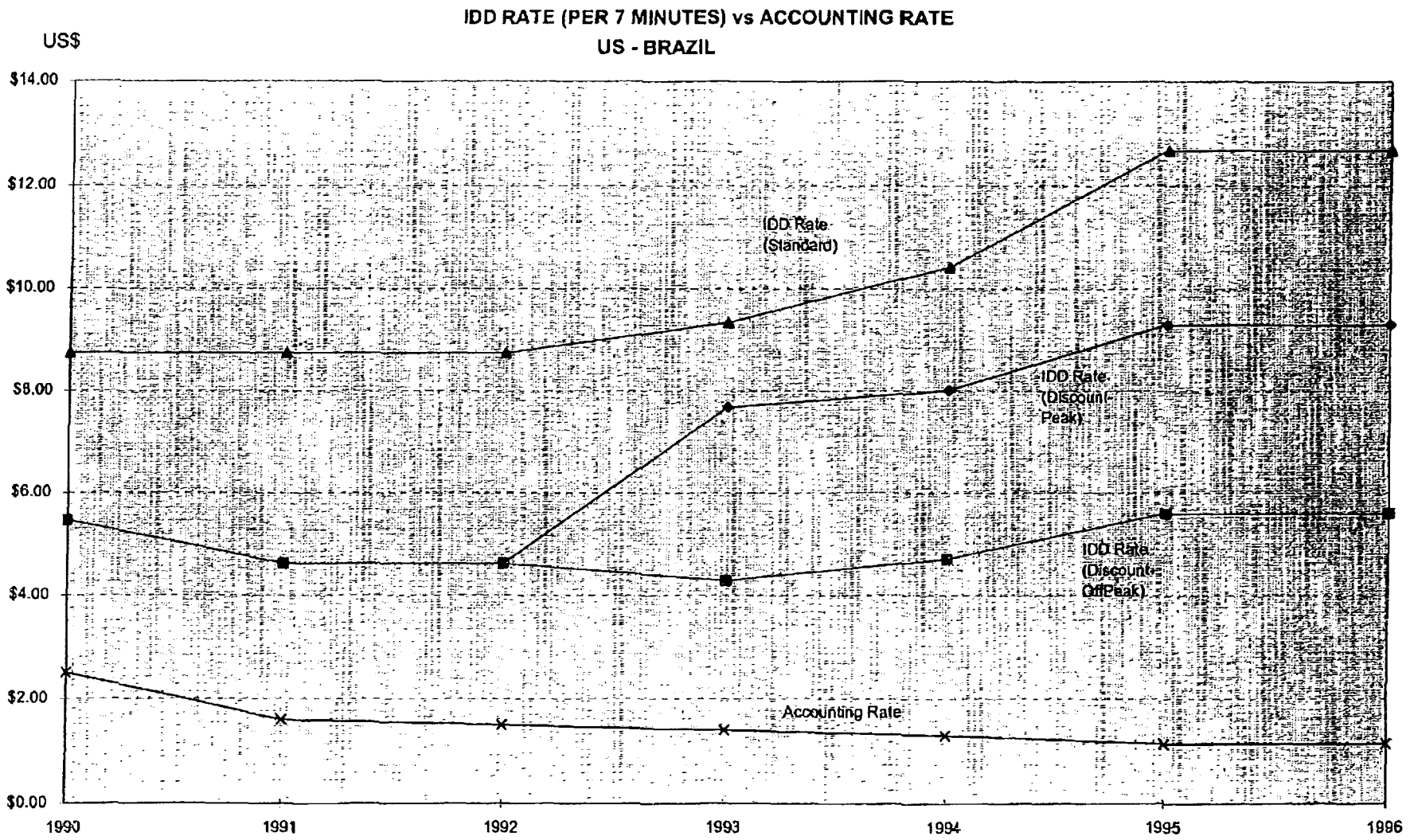
	IDD Standard Rate	Accounting Rate
Australia	15%	49%
Brazil	45%	54%
Canada	19%	14%
China	19%	37%
Colombia	45%	26%
Dominican Rep.	28%	23%
Egypt	34%	26%
El Salvador	29%	20%
France	23%	80%
Germany	15%	87%
Greece	52%	47%
Guatemala	40%	21%
Hong Kong	9%	55%
India	3%	20%
Israel	37%	29%
Italy	33%	76%
Jamaica	48%	21%
Japan	15%	52%
Korea, Rep. of	14%	41%
Mexico	14%	49%
Netherlands	33%	77%
Nigeria	53%	0%
Pakistan	62%	0%
Peru	53%	37%
Phillipines	28%	38%
Poland	15%	37%
Russia	12%	13%
Saudi Arabia	41%	7%
South Africa	33%	40%
Spain	43%	24%
Switzerland	26%	69%
Taiwan	13%	33%
Thailand	14%	35%
United Kingdom	13%	66%

Calculated from data in Table 11, FCC 1996 International Trends Report.

IDD RATE (PER 7 MINUTES) vs ACCOUNTING RATE
US - AUSTRALIA



pmaloverseas/acc/prc.xls



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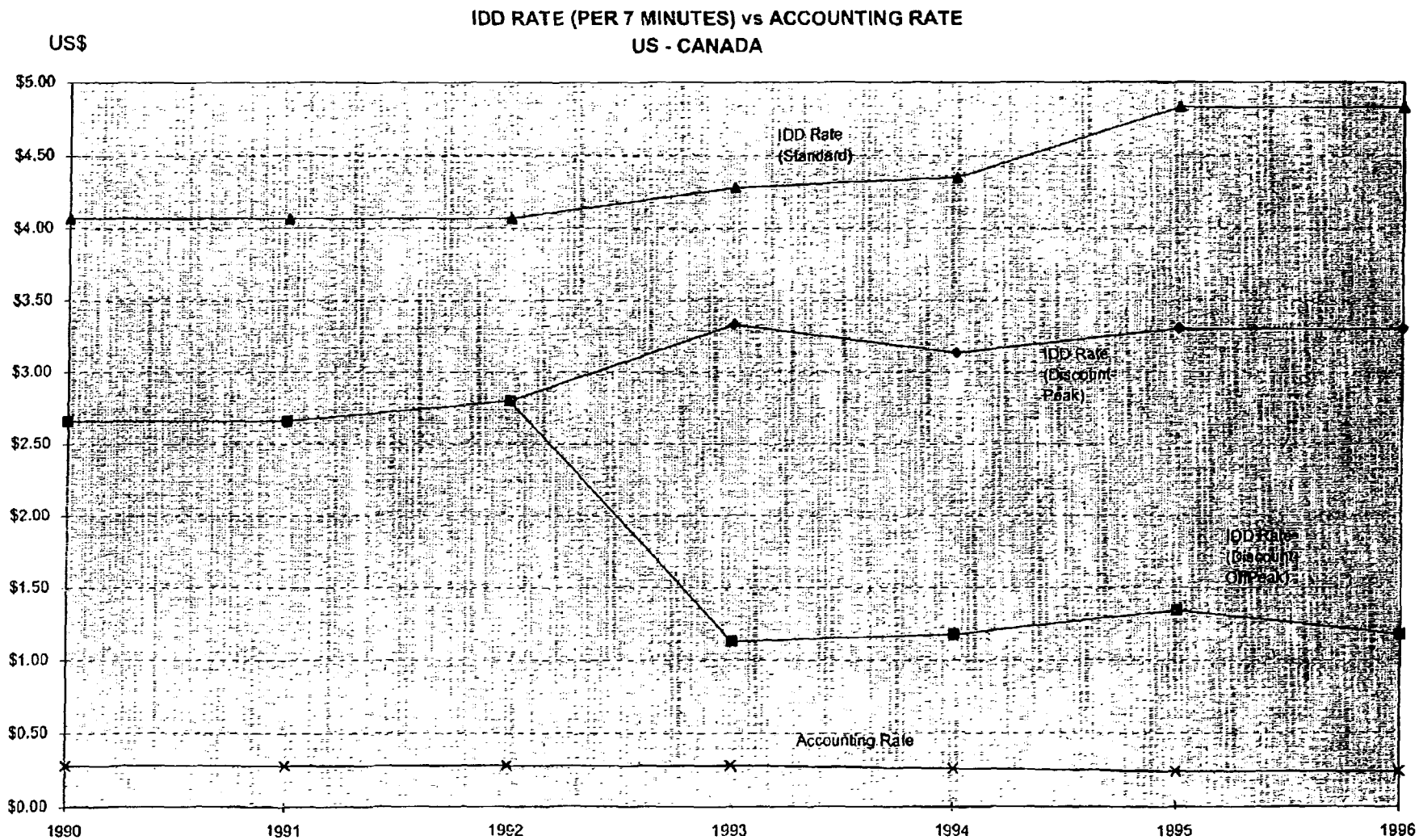
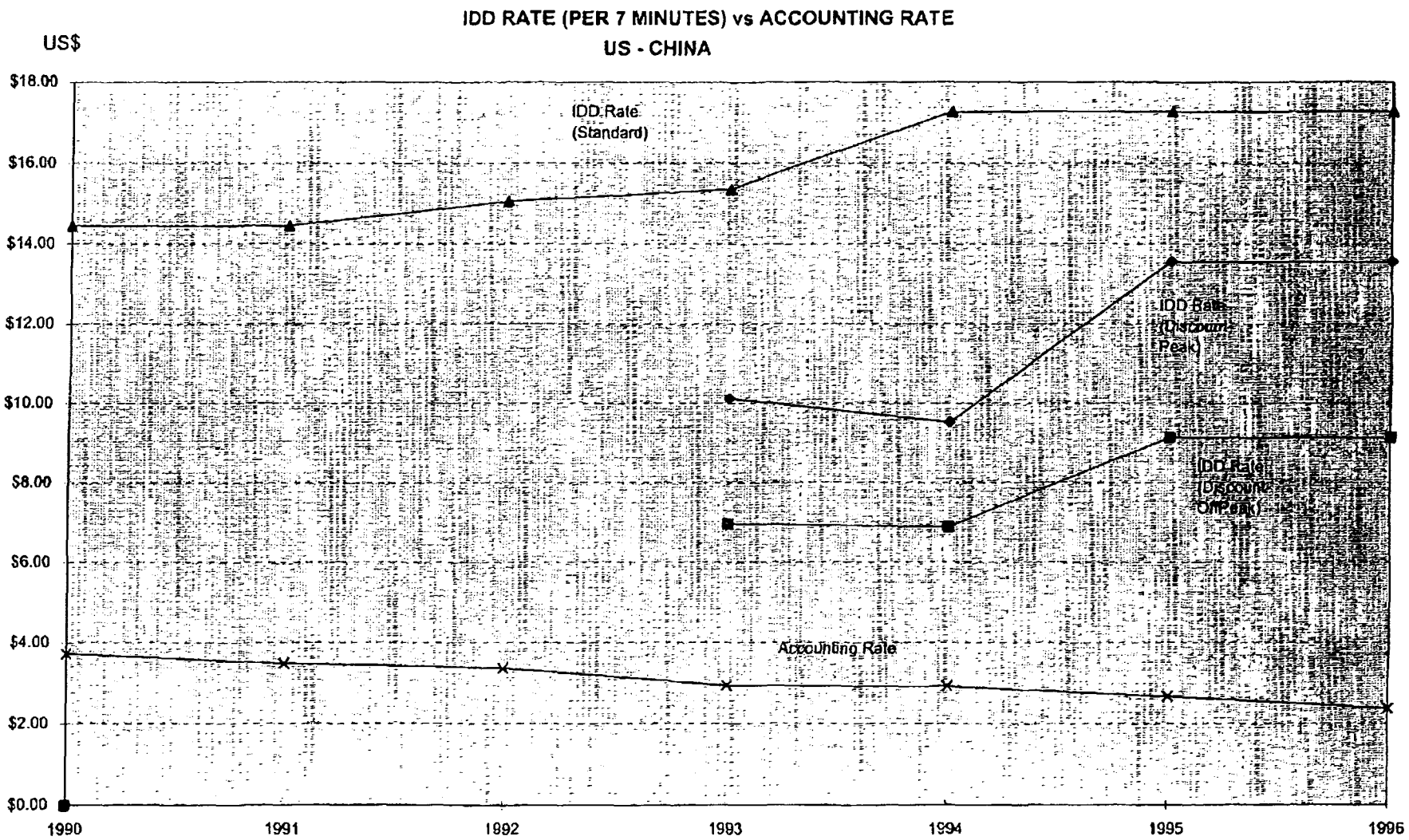


pma/overseas/ecctarc.xls



p/ma/overseas/acctpric.xls