

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

ORIGINAL  
RECEIVED  
MAR 31 1997  
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of )  
)  
)  
International Settlement Rates )  
)  
)

IB Docket No. 96-261

**REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION**

MCI Telecommunications Corporation (MCI), by its undersigned counsel, hereby replies to comments in response to the Federal Communications Commission's (Commission's) Notice of Proposed Rulemaking (Notice)<sup>1</sup> in the above-captioned proceeding. MCI and most of the commenters to this proceeding support the Commission's goals of improving competition in worldwide telecommunications markets<sup>2</sup> and achieving settlement rates that more closely approximate costs.<sup>3</sup>

For the reasons stated in the Notice and in MCI's Comments in this proceeding, implementation of benchmark rates based on foreign tariff component prices (TCP) would represent an important and reasonable interim step toward the achievement of true cost-based

---

<sup>1</sup> Notice of Proposed Rulemaking, International Settlement Rates, IB Docket No. 96-261, (Released December 19, 1996).

<sup>2</sup> See, e.g., Comments filed by ACC Comments at 1; AT&T (ATT) at iii; Government of Australia at para. 2; Deutsche Telekom AG (DT) at ii; France Telecom (FT) at iii; International Telecom Japan (ITJ) at i; Government of Japan at 1; Primus at 1; Telefonica del Peru (Peru) at ii; Telecom New Zealand Limited (TNZL) at i; and Tricom at 2.

<sup>3</sup> See, e.g., Comments filed by ACC at 4; ATT at i; Association of Telecommunications Enterprises of the Andean Subregional Agreement (ATEASA) at para. 4; Cable and Wireless at 2; DT at ii; FT at 3; ITJ at i; Peru at ii; Primus at 1; Sri Lanka Telecom Ltd. (SLT) at 1; Telecomunicaciones Internacionales de Argentina Telintar S.A. (Telintar) at iii; and Telecommunications Resellers Association (TRA) at 3; and TNZL at i.

04  
FEDERAL COMMUNICATIONS COMMISSION

settlement rates and would further the public interest. Several other commenters also support this view.<sup>4</sup> Accordingly, the Commission should implement expeditiously its benchmarks as interim negotiating targets, as discussed below.

With respect to authorizations for the origination or termination of U.S. international traffic, MCI supports the imposition of an express condition -- the settlement rates on the route in question must be within the low end of the benchmark range.<sup>5</sup> The use of a World Trade Organization (WTO)-compatible effective competitive opportunities (ECO) test, together with this condition, would be the minimum requirements needed to limit the impact of competitive distortion in the U.S. market for international services.<sup>6</sup>

#### **I. THE PROPOSED BENCHMARK METHODOLOGY IS A REASONABLE WAY TO DEVELOP INTERIM TARGET ACCOUNTING RATES**

Settlement rate benchmarks based on foreign tariff component prices (TCP) are closer to cost than current settlement rates in most cases.<sup>7</sup> They would also have the effect of insuring

---

<sup>4</sup> ATT at 17, Frontier at 1, House Committee on Commerce (COC) at 2, Sprint at 10, and WorldCom at 7.

<sup>5</sup> The Commission has proposed that the low end of the benchmark settlement range would be 6 cents-9 cents per minute. Notice at paras. 34 and 53.

<sup>6</sup> The United States Government has recently entered into a WTO agreement on basic telecommunications services. As a result, the Commission has announced recently that it will soon seek comments on whether refinement of the ECO test is necessary to address certain commitments resulting from that agreement. See, "Hundt Tells Congress FCC Will Review Rules Governing Foreign Carrier Entry", Phillips Business Information, Inc. 1997. An unequivocal condition based on rates within the low end of the benchmark range would establish a clear mechanism to limited the impact of competitive distortion in the U.S. market, especially if the ECO test requires refinement.

<sup>7</sup> See, e.g., ATT at 14, MCI at 3, WorldCom at 8. TCP settlement rates were calculated by the Commission using specific network elements: (1) international transmission facilities; (2) international switching facilities; and (3) national extension (domestic transport and termination). Notice at para. 35.

that U.S. carriers would pay no more for terminating service from the United States in foreign countries than domestic customers pay in those countries for termination.<sup>8</sup> As demonstrated below, no commenter has raised a credible reason to justify delaying the implementation of TCP-based benchmark settlement rates as an interim solution. TCP-based rates are more than adequate to recover costs in most circumstances. Also, the Commission's benchmark calculations, with a slight modification proposed by MCI, would satisfy the objectives of the Notice, while alleviating concerns regarding the use of averages or country-specific targets. Finally, U.S. consumers will benefit from a rapid transition to lower settlement rates.

**A. NO PARTY HAS DEMONSTRATED THAT TCP-BASED RATES SHOULD BE ADJUSTED TO REFLECT OTHER COST FACTORS.**

Foreign carrier tariffs, and therefore TCP-based rates, presumably cover carrier costs.<sup>9</sup> In fact, they are likely to be substantially above the cost-based rates that would be charged in a competitive environment.<sup>10</sup> Nonetheless, some carriers or administrations argue that TCP-based rates are too low to allow for full cost recovery,<sup>11</sup> or that the methodology in arriving at these rates is inaccurate in some other respect.<sup>12</sup> However, no convincing evidence and no cost studies have been submitted to substantiate these concerns. In fact, the methodology adopted by the

---

<sup>8</sup> See, e.g., ATT at 15, MCI at 3, and WorldCom at 8.

<sup>9</sup> Id. at para. 42.

<sup>10</sup> Id.

<sup>11</sup> See, e.g., Chunghwa Telecom, Republic of China on Taiwan (Chungwa) at 2, FT at 10, Peru at 12 and Trinidad and Tobago at 9

<sup>12</sup> For example, FT argues that its own experience does not support the Commission's assumptions underlying the calculation of the international transmission component. However, FT does not provide any documentation that would support a different result. FT at 10.

Commission is based upon the same framework of rate components that was included in Recommendation D.140, which encourages cost-based settlement rates. This recommendation was accepted by over 180 countries that comprise the Member States of the International Telecommunications Union.<sup>13</sup> Without documentation, general allegations that the Commission's methodology results in below-cost rates are completely unconvincing, and should be given no weight.<sup>14</sup>

A few parties also allege that higher settlement rates are needed for infrastructure development in their countries.<sup>15</sup> However, there is no evidence on the record that above cost settlement rates result in any increase in infrastructure development or connectivity to the international telecommunications network. Nor has it been demonstrated that the imposition of

---

<sup>13</sup> ITU, Telecommunications Standardization Sector, ITU Recommendation D. 140, Accounting Rate Principles for International Telephone Services, (Geneva 1992, revised 1995) (ITU Rec. D. 140). See also, ITU, Study Group 3 - Contribution 1, Tariff and Accounting Principles including Related Telecommunications Economic and Policy Issues, November 1996

<sup>14</sup> For example, a few foreign carriers allege that cross subsidies artificially reduce their local rates, which would be an element of the national extension (domestic transport and termination) component of TCP-based benchmarks. Therefore, these parties allege, TCP-based settlement charges would include below-cost components and would be too low to allow for recovery of the carriers' costs.

However, these parties have failed to provide convincing documentation that cross-subsidies exist, or that the alleged cross-subsidies adversely affect the overall TCP-based calculation. TCP includes components for international transmission and international switching. Thus, if international rates are subsidizing local rates, then both the international transmission and international switching elements may be significantly above cost. Even if limited cross-subsidies do exist, TCP components, taken as a whole, will still cover a carrier's reasonable costs of originating or terminating international traffic. Thus, allegations of cross-subsidy alone are insufficient to substantiate a claim that actual costs exceed TCP-based settlement rates. Nonetheless, in the event a carrier is able to demonstrate that its costs actually exceed TCP-based settlement rates, it should be able to justify a waiver of the benchmark requirements.

<sup>15</sup> See, e.g., Cable and Wireless at 12. Carriers similarly allege that longer transitions time frames are necessary to accommodate infrastructure improvements. Id.

uneconomic settlement rates is a fair or efficient means for accommodating these concerns.

Thus, there is no credible evidence on the record that calls into question the overall reasonableness of TCP-based rates as a basis for interim target benchmarks. In any event, as demonstrated in MCI's initial comments and herein, little purpose would be served by trying to develop a more complicated scheme based on multiple factors, when it is not clear that these factors will improve the analysis.<sup>16</sup> Individual concerns can and should be accommodated on an interim basis by permitting an individual waiver of the specified benchmark upon a demonstration that other factors should be considered that would justify settlement rates that exceed the TCP component rates. The Commission should, however, make clear that the burden of proof rests with the party seeking the waiver.<sup>17</sup>

**B. THE BENCHMARK RATE SHOULD BE SET AT THE LOWER OF THE COUNTRY-SPECIFIC TCP-BASED RATE OR A TARGETED RATE THAT IS TWENTY PERCENT ABOVE THE MEAN FOR A COUNTRY'S ECONOMIC DEVELOPMENT CATEGORY.**

With respect to averaged vs. country-specific benchmarks, MCI proposed in its comments that each foreign carrier be required to meet the lower of its country-specific benchmark or a targeted rate that is twenty percent above the mean for its country's economic development category.<sup>18</sup> This approach would best accommodate concerns raised by certain parties with respect to both average and country-specific benchmarks.

Several parties favor averages because carriers could manipulate country-specific benchmarks by increasing their tariff rates and, consequently, their TCP-based settlement

---

<sup>16</sup> MCI at 5.

<sup>17</sup> WorldCom at 4.

<sup>18</sup> MCI at 5.

benchmarks.<sup>19</sup> However, placing a cap, as MCI recommends, on cost recovery for high-cost carriers (the average plus twenty percent) limits the impact of inefficiencies and the ability of carriers to manipulate their rates. Other parties argue against average benchmarks because (1) averages fail to consider individual cost variations between countries, such as geographic location and population density<sup>20</sup> or (2) the economic development categories used for averaging are too broad and are thus unfair to those at the bottom end of the scale within each category.<sup>21</sup> MCI's recommended twenty percent margin above the average would alleviate these concerns by allowing greater flexibility to accommodate individual cost differences, and reducing the disadvantage to those in the lower end of a broad economic development category. For these reasons, MCI's recommended approach would best accommodate the concerns of all the parties while still achieving the objectives of the Notice.

**C. THE PUBLIC INTEREST WOULD BEST BE SERVED BY IMPLEMENTATION OF BENCHMARKS IN THE SHORTEST POSSIBLE TIME FRAME.**

In its Comments, MCI demonstrated why the Commission should establish as an objective a short transition period for achieving benchmark rates, and a "glide path" to move settlement rates closer to benchmarks in at least annual increments.<sup>22</sup> No party has convincingly argued that delay is necessary or justified.

---

<sup>19</sup> See, e.g., United Kingdom Government (UK) at para. 10. The Commission expressed similar concerns regarding country-specific benchmarks in its Notice at para. 55

<sup>20</sup> See, e.g., TNZL at 7.

<sup>21</sup> See, e.g., Caribbean Association of National Telecommunications Organizations (CANTO) at 9, Singapore Telecommunications Authority (STL) at 9, and Tricom at 3.

<sup>22</sup> While there are slight variations among U.S. carrier recommendations, in general the time frames recommended are within the shortest time frames proposed by the Commission.

Some commenters argue that a longer transition is needed to encourage foreign infrastructure development.<sup>23</sup> To the contrary, improved technology at reduced costs should permit foreign infrastructure development to proceed more cheaply and rapidly than it has historically. The waiver process would best accommodate individual country variations while promoting good faith efforts to reduce settlement rates. This process, together with a provision permitting carriers with higher than average initial rates to meet a benchmark twenty percent above the average rate for its country's economic category, should provide more than adequate flexibility for carriers to meet the proposed transition schedule.

Previous reductions in settlement rates have resulted in substantial benefits to U.S. consumers in terms of reduced prices for international calls.<sup>24</sup> The record shows, for example, that AT&T's average collection rates have declined more rapidly than the overall average settlement rate costs over the past several years. MCI's effective rates to U.S. customers also typically reflect changes in its underlying costs.<sup>25</sup> In a competitive market, such as the U.S. international services market, implementation of benchmark rates should continue to yield rate reductions and other consumer benefits in the future.

For these reasons, MCI supports the Commission's efforts to reduce settlement rates as expeditiously as possible and will work with foreign administrations to negotiate lower

---

<sup>23</sup> See, e.g., Cable & Wireless at 12.

<sup>24</sup> ATT at 9.

<sup>25</sup> ATT at 10. Contrary to the allegations of some commenters, (See, e.g., Cable and Wireless at 18-20), nominal accounting or settlement rate reductions cannot be compared with changes in collection rates on a penny for penny basis. In addition to the nominal settlement rate, factors such as the inbound/outbound ratio and projected changes thereto, currency fluctuations, transit prices, uncollectibles and other cost factors also affect the marginal cost of service and the pricing constraints on particular routes

settlement rates. If a U.S. carrier makes a showing that it is unable to reach an agreement that meets the applicable benchmark within a reasonable time frame and seeks Commission intervention, the Commission should contact the responsible government authorities and seek their support and assistance in achieving the applicable benchmark rate.<sup>26</sup> Ultimately, if necessary, a U.S. carrier could request, the Commission to utilize its authority to facilitate achievement of the objectives of the Notice,<sup>27</sup> pursuant to Sections 201(a), 201(b) and 205 of the Communications Act.<sup>28</sup>

**II. AUTHORIZATIONS FOR ORIGINATING AND TERMINATING U.S. INTERNATIONAL SERVICES SHOULD INCLUDE A CONDITION THAT SETTLEMENT RATES BE WITHIN THE LOW END OF THE APPLICABLE BENCHMARK RANGE.**

As MCI demonstrated in its comments, a real opportunity to compete in a foreign market remains the most effective mechanism to eliminate the ability of a foreign carrier to distort competition in the U.S. international services market and to ensure that settlement rates gravitate toward cost-based levels.<sup>29</sup>

MCI recognizes, however, that the Commission is likely to initiate a proceeding to examine the ECO-test in light of multilateral commitments that the U.S. Government has recently undertaken in the WTO.<sup>30</sup> Thus, to address the significant potential for competitive

---

<sup>26</sup> MCI at 8.

<sup>27</sup> ATT at 59, Frontier at 13, WorldCom at 4.

<sup>28</sup> See, Regulation of International Accounting Rates, Further Notice of Proposed Rulemaking, 6 FCC Rcd. 3434, 3436 (1991).

<sup>29</sup> MCI at 1.

<sup>30</sup> After comments were filed in this proceeding, the U.S. Government became a signatory to the WTO trade agreement on basic telecommunications.

distortion in the U.S. market, the Commission should also condition authorizations on achievement of settlement rates that fall within the low end of the benchmark range.<sup>31</sup> This condition would be the minimum standard needed to help constrain the impact of competitive distortion in the U.S. international services market. Moreover, this clear standard would demonstrate the Commission's strong commitment to settlement rates approaching cost-based levels.

## **CONCLUSION**

For the reasons discussed above, TCP-based rates in general represent a necessary and reasonable interim step toward achieving the public interest benefits that will result from truly cost-based settlement rates. MCI recognizes that, in some unique situations, a deviation from this general rule may be justified. These limited exceptions can be addressed most fairly and effectively on a case-by-case basis in waiver proceedings. The Commission should, therefore, expeditiously implement its benchmarks as interim negotiating targets.

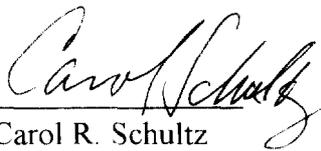
---

<sup>31</sup> See, ATT at 40.

For foreign carrier authorizations, the ECO test remains the best mechanism for preventing competitive distortion in the U.S. international services market. However, settlement rates approaching cost would also help limit the potential for competitive distortion in the U.S. market. The Commission has recently indicated that a possible revision to the ECO standard is imminent and, in that proceeding, MCI will present its comments on any changes that may be necessary to bring U.S. regulation into conformity with the WTO commitments. Whatever the results of that subsequent proceeding, the Commission should condition authorizations for originating or terminating U.S. international services on settlement rates that are within the low end of the benchmark range.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By   
Carol R. Schultz  
John M. Scorce  
Larry Blosser  
1801 Pennsylvania Ave, N.W.  
Washington, D.C. 20006  
(202) 887-3101  
Its Attorneys

March 31, 1997

## CERTIFICATE OF SERVICE

I, Tammy L. Mitchell, do hereby certify that a copy of the foregoing Reply Comments of MCI Telecommunications Corporation was hand delivered or sent by first class United States mail, postage paid on this 31<sup>st</sup> day of March, 1997, to the following:

Mr. Joseph S. Charter  
Permanent Secretary  
Ministry of Works, Communications  
& Public Utilities  
Young Street, St. George's  
Grenada, W.I.

Kenneth Robinson, Esq.  
Telecom Italia  
1133 21<sup>st</sup> Street, N.W.  
P.O. Box 57-455  
Washington, D.C. 20037

Honorable Jeremiah Scott  
Ministry of Communications & Works  
Kingstown, St. Vincent  
and the Grenadines

Chief Executive Officer  
Lattelekom SIA  
Valnu tela 30  
LV - 1050 Riga  
Latvijas Republika

Honorable Robin Yearwood  
Minister of Public Works Utilities  
& Transportation  
Ministry of Public Works, Utilities  
& Transportation  
Cassasa Gardens  
P.O. Box 416  
St. John's Antigua

Ambassador Jeffrey M. Lang  
Deputy U.S. Trade Representative  
Office of the U.S. Trade Representative  
600 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20506

Ambassador Vonya B. McCann  
U.S. Coordinator  
International Communications  
and Information Policy  
Department of State  
Room 4826  
2201 C Street, N.W.  
Washington, D.C. 20520

Mr. Larry Irving  
Assistant Secretary for Communications  
and Information  
Room 4898  
Department of Commerce  
NTIA  
14<sup>th</sup> Street & Constitution Avenue, N.W.  
Washington, D.C. 20230

Leon M. Kestenbaum, Esq.  
Sprint Communications Company  
1850 M Street, N.W.  
11<sup>th</sup> Floor  
Washington, D.C. 20036

Kent Y. Nakamura, Esq.  
Sprint Communications Company  
1850 M Street, N.W.  
11<sup>th</sup> Floor  
Washington, D.C. 20036

Mr. Robert S. Koppel  
Vice President  
International Regulatory Affairs  
Worldcom, Inc.  
15245 Shady Grove Road  
Suite 460  
Rockville, MD 20850

Leon T. Knauer, Esq.  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Avenue, N.W.  
Washington, D.C. 20006-5209

Mr. K. P. Tiwari\*  
Chief General Manager  
Videsh Sanchar Nigam Limited  
Videsh Sanchar Bhavan  
Fort Bombay, INDIA

Mr. I. Rudaka  
Ministry of Transport of the Republic of Latvia  
Department of Communications  
3 Gogola Street  
Riga, LV 1190, Latvia

Telstra Corporation Limited  
231 Elizabeth Street  
Sydney N.S.W. 2000  
Australia

Gregory C. Staple, Esq.  
R. Edward Price  
Koteen & Naftalin, L.L.P.  
1150 Connecticut Avenue, N.W.  
Suite 1000  
Washington, D.C. 20036

Richard S. Whitt, Esq.  
Director, Federal Affairs  
1120 Connecticut Avenue, N.W.  
Suite 400  
Washington, D.C. 20036

Seung-Sul Woo, Esq.  
Vice President  
Strategic Marketing Group  
Korea Telecom  
211 Sejongro Chongnogu  
Seoul, Korea 110-777

Young-Chul Kim, Esq.  
Executive Vice President  
DACOM Corporation  
DACOM Bldg., 65-228, 3-Ga  
Hangana-ro  
Seoul, Korea 140-712

Chung Huh, Esq.  
Senior Managing Director  
ONSE Telecom  
942-1 Daechi-dong Kangnam-ku  
Seoul, Korea 135-280

Mr. Suyue-Ching Lu  
President & CEO  
Chunghwa Telecom Co. Limited (CHT-I)  
No. 31 Ai-Kuo E. Rd.  
Taipei, 106, Taiwan  
Republic of China

Ms. Kelly Boan  
North American Representative  
Telia AB  
234 Oak Court  
P.O. Box 752  
Severna Park, MD 21146

Mr. Zhang Ligui  
General Director  
Directorate General of Telecommunications  
P&T, China  
13, West Chang An Avenue  
Zip: 100804  
Beijing, P.R. China

Mr. V.B. Bajracharya  
General Manager  
Nepal Telecommunications Corporation  
Singh Durbar  
Kathmandu, Nepal

Robert J. Aamoth, Esq.  
Kelley Drye & Warren, L.L.P.  
1200 19<sup>th</sup> Street, N.W.  
Suite 500  
Washington, D.C. 20036

Gary M. Epstein, Esq.  
Teresa D. Baer, Esq.  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Mr. Stanley J. Moore  
Pacific Bell Communications  
5850 West Las Positas Blvd.  
Pleasanton, CA 94588

Mr. Ward W. Wueste  
GTE Service Corporation  
One Stamford Forum  
Stamford, CT 06904

Mr. Pat Phillips  
First Secretary, Trade Policy  
British Embassy Washington/UK Gov't  
Trade Department  
3100 Massachusetts Avenue, N.W.  
Washington, D.C. 20008

Ms. Iris Struiken-Wijdenbosch  
Chairwoman of CANTO  
Caribbean Association of National  
Telecommunication Organizations  
67 Picton Street, Newton  
Port of Spain, Trinidad, W.I.

Mr. Philip J. Richards  
Managing Director  
Telecom Vanuatu Limited  
P.O. Box 146  
Port Vila  
Vanuatu

Mr. David Glickman  
President  
Justice Technology Corporation  
One Justice Way  
Box 1110  
El Segundo, CA 90245

Gail L. Polivy, Esq.  
GTE Service Corporation  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036

Michael J. Shortley, III, Esq.  
Senior Attorney, Regulatory Services  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646

Mr. C. Glenn Alwart  
Government of the Republic of Suriname  
Embassy of the Republic of Suriname  
Washington, D.C.

Mr. Klaus Mai  
A. Bradley Shingleton  
Deutsche Telekom, Inc.  
1020 19<sup>th</sup> Street, N.W.  
Suite 850  
Washington, D.C. 20036

Mr. Tom Bliley  
Chairman  
U.S. House of Representatives  
Committee on Commerce  
Room 2125, Rayburn House Office Bldg.  
Washington, D.C. 20515

Mr. José A. Cela  
President  
AHCJET  
Box 70325  
San Juan, Puerto Rico 00936

Theodore W. Krauss, Esq.  
Danielle K. Aguto, Esq.  
France Telecom North America  
555 13<sup>th</sup> Street, N.W.  
Suite 1100 East  
Washington, D.C. 20004

The Telecommunications Authority  
of Singapore (TAS)  
35 Robinson Road  
Singapore 0106

Albert Halprin, Esq.  
Halprin, Temple, Goodman & Sugrue  
1100 New York Avenue, N.W.  
Suite 650 East  
Washington, D.C. 20005

Mr. Jerry Babski  
Director  
Department of International Cooperation  
Ministry of Communications  
Republic of Poland  
Pl. Malachowskiego 2  
00-940 Warszawa Poland

Raul R. Rodriguez, Esq.  
Walter P. Jacob, Esq.  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Raul R. Rodriguez, Esq.  
Walter P. Jacob, Esq.  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Leon T. Knauer, Esq.  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Avenue, N.W.  
Suite 600  
Washington, D.C. 20006

Adam L. Kupetsky, Esq.  
Swidler & Berlin, Chartered  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

Margaret M. Charles, Esq.  
Swidler & Berlin, Chartered  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

Jonathan J. Nadler, Esq.  
Squire, Sanders & Dempsey  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 407  
Washington, D.C. 20044

Robert J. Aamoth, Esq.  
Kelley Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Suite 500  
Washington, D.C. 20036

Mr. Samuel A. Martin  
Chief Executive Officer  
Telecommunications Services of  
Trinidad and Tobago Limited  
P.O. Box 914, 54 Frederick Street  
Port of Spain, Trinidad, W.I.

Mr. Errald Miller  
President & CEO  
Telecommunications of Jamaica Limited  
47 Half Way Tree Road  
P.O. Box 21  
Kingston 5  
Jamaica, W.I.

European Union  
Delegation of the European Commission  
2300 M Street, N.W.  
3<sup>rd</sup> Floor  
Washington, D.C. 20037

Judith D. O'Neill, Esq.  
Janet Hernandez, Esq.  
Reid & Priest, L.L.P.  
701 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Jeffrey P. Cunard, Esq.  
Debevoise & Kneifel  
555 13<sup>th</sup> Street, N.W.  
Suite 1100E  
Washington, D.C. 20004

Mr. Dato' Mohamed Said Mohamed Ali  
Chief Executive  
Telekom Malaysia Berhad  
Wisma Telekom  
Jalan Pantai Baru  
59200 Kuala Lumpur  
Malaysia

Martin J. Lewin, Esq.  
Aitken Irvin Lewin Berlin  
Vrooman & Cohn, L.L.P.  
1709 N Street, N.W.  
Washington, D.C. 20036

Mr. Simeon L. Kintanar  
Commissioner  
Republic of the Philippines  
Department of Transportation  
& Communication  
National Telecommunications Commission  
865 Vibal Bldg, Edsa Corner Times St.,  
Q.C.

Mr. Eng. M. Obied  
Chairman of Board  
Director General of STE  
Syrian Arab Republic  
Syrian Telecommunications Establishment  
S.T.E.

Mr. Atma Ram  
President  
Pacific Islands Telecommunications Association  
P.O. Box 2027  
Government Buildings  
Suva, FIJI

Mr. H. Soerjodibroto  
President  
Indosat  
Jalan Medan Merdeka Barat 21  
Jakarta, 10110, Indonesia

Mr. Nasser Al-Tammimi  
Telecommunications Director  
The Cooperation Council for the Arab  
States of the Gulf  
Secretariat General  
P.O. Box 7153  
Kingdom of Saudi Arabia, Riyadh 11462

Mr. J. Robert Vastine  
President  
Coalition of Services Limited  
Suite 1110  
805 15<sup>th</sup> Street, N.W.  
Washington, D.C. 20005

Honorable John Fisango  
Minister of Transport  
Communications & Works  
Solomon Islands Government  
Ministry of Transport  
Communication & Works  
P.O. Box G8  
Honlara

James M. Fink, Esq.  
Squire, Sanders & Dempsey, L.L.P.  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 407  
Washington, D.C. 20044

Mr. HJ Hod Parman  
Director General  
Jabatan Telekom Malaysia  
Wisman Damansara, Jalan Semantan  
50668 Kuala Lumpur, Malaysia

Mr. Sethaporn Cusripituck  
Deputy Director General  
The Post and Telegraph Department of  
Thailand  
Bangkok 10210, Thailand

Mr. Aswin Saovaros  
President  
The Communications Authority of Thailand  
99 Chaeng Watthana Road  
Donmuang, Bangkok 10002  
Thailand

Alfred M. Mamlet, Esq.  
Steptoe & Johnson, L.L.P.  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Mr. Terrance P. McGarthy  
President  
The Zephyr Capital Group  
24 Woodbine Road  
Florham Park, NJ 07932

Philip V. Permut, Esq.  
Kelley, Drye & Warren, L.L.P.  
1200 19<sup>th</sup> Street, N.W.  
Suite 500  
Washington, D.C. 20036

Philip V. Permut, Esq.  
Kelley, Drye & Warren, L.L.P.  
1200 19<sup>th</sup> Street, N.W.  
Suite 500  
Washington, D.C. 20036

Mr. Junichiro Miyazaki  
Counselor of Embassy of Japan  
Embassy of Japan  
2520 Massachusetts Avenue, N.W.  
Washington, D.C. 20008

Ing. Marcelo Lopez Arjona  
Secretary General  
ASETA  
Calle La Pradora No. 510  
y San Salvador, Casilla 17-11-06042

Mr. Nooruddin Baqai  
Chief Engineer  
Pakistan Telecom Authority  
Headquarters H-9/4 Islamabad

Mr. W.J. Henderson  
Counsellor  
Embassy of Australia  
1601 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

Ing. Rene Bucaram Bokhazi  
Executive President  
Empresa Estatal de Telecomunicaciones  
(EMETEL)  
Av. 6 de Diciembre y Colon Edificio Partenon  
22202 Casilla Postal 17-01 3055  
Quito Ecuador

Mr. Hiroshi Shibata  
Director - International Services  
International Digital Communications  
5-20-8, Asakusabaski, Taito-ku  
Tokyo 111-61, Japan

Mr. Jose Blackburn  
President  
Empresa Nacional de Telecomunicaciones  
Telecom Colombia  
Calle 23 No. 13-49  
Bogota, Colombia - D.C. 1

James D. Ellis, Esq.  
SBC Communications, Inc.  
175 E. Houston  
Room 1254  
San Antonio, TX 78205

Mr. K.K. Mahendiran  
General Manager, International Service  
Sri Lanka Telecom Limited  
Headquarters  
Lotus Road  
P.O. Box 503  
Colombo 01 (Sri Lanka)

Eng. Abdullah S. Al-Suwailem  
Acting General Manager  
Kingdom of Saudi Arabia  
Ministry of P.T.T.  
Dy. Ministry for Fin. & Admin.  
International Accounts Department  
Riyadh (11112)

Charles C. Hunter, Esq.  
Hunter & Mow, P.C.  
1620 I Street, N.W.  
Suite 701  
Washington, D.C. 20006

Thomas E. Skilton, Esq.  
Squire, Sanders & Dempsey  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 407  
Washington, D.C. 20044

Mark C. Rosenblum, Esq.  
AT&T Corporation  
295 N. Maple Avenue  
Room 3252H3  
Basking Ridge, NJ 07920

Mr. Erik R. Olbetor  
Economic Strategy Institute  
1401 H Street, N.W.  
Suite 750  
Washington, D.C. 20005

Telekomunikacja Polska SA  
(TPSA - Polish Telecom)  
Swietokrzyska 3, str  
00-945 Warszawa  
Poland

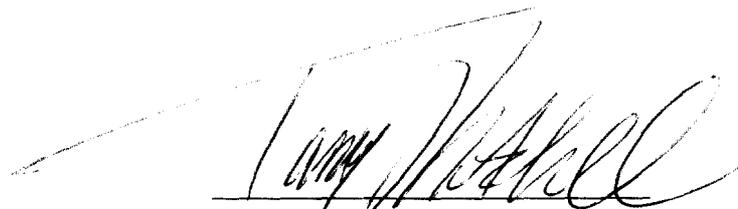
Mr. George Li\*  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
Room 835  
Washington, D.C. 20554

Ms. Diane Cornell\*  
Federal Communications Commission  
2000 M Street, N.W.  
Room 838  
Washington, D.C. 20554

Mr. Troy Tanner\*  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
Room 833  
Washington, D.C. 20554

Ms. Kathryn O'Brien\*  
Federal Communications Commission  
2025 M Street, N.W.  
Room 5202  
Washington, D.C. 20554

Mr. Peter Cowhey\*  
Acting Chief  
International Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
Room 827  
Washington, D.C. 20554



Tammy E. Mitchell

\* **Hand Delivery**