



Amy L. Alvarez  
Executive Director  
International External Affairs  
AT&T Services, Inc.  
1120 20<sup>th</sup> St., NW, Suite 1000  
Washington, DC 20036

T: (202) 457-2315  
F: (281) 664-9610  
amy.alvarez@att.com

March 5, 2015

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

*Re: Petition for Protection from Anticompetitive Behavior and Stop Settlement  
Payment Order on the U.S.-Pakistan Route, IB Docket 12-324*

*Reporting Requirements for U.S. Providers of International  
Telecommunications Services, IB Docket No. 04-112*

Dear Ms. Dortch:

On March 4, 2015, Eric Loeb, James Talbot, Carol Bourdette and I, all of AT&T, met with Troy Tanner, Kathleen Collins, Jodi Cooper, Howard Griboff, David Krech, Albert Lewis and Olga Madruga-Forti of the International Bureau to discuss the above-mentioned proceedings. Kimberly Cook of the International Bureau participated via conference call.

During the meeting we discussed recent developments that have resulted in the dissolution of the International Clearing House (ICH) mechanism in Pakistan and expressed support for the removal of the Stop Settlement Payment Order on the U.S.-Pakistan route as soon as U.S. carriers negotiate commercial rates.

With regard to the revised reporting requirements that were issued on January 15, 2013, and the related implementing manual for international traffic reporting that was not issued in its final version until February 13, 2015, we highlighted that the process requires more detail than previously reported for both facilities-based and resale providers, thus creating additional burdens in the collection of the data. In addition, with respect to the 43.62 reporting requirements, we raised the issue of conformance to the Form 499A reporting and the aggregation of affiliate entities that can be consolidated into a single entity's filing, and that the aggregation of these entities is burdensome and places significant additional time and headcount constraints on the reporting process. We also expressed concerns with the FCC's delay of the Part 43 testing, which combined with the additional burdens of collecting and certifying the data, directly and negatively impacts AT&T's ability to submit the required data by the publicly stated filing deadline.

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

Sincerely,  


cc: Troy Tanner  
Kathleen Collins  
Kimberly Cook  
Jodi Cooper  
Howard Griboff  
David Krech  
Albert Lewis  
Olga Madruga-Forti