



April 26, 2016

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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: International Settlements Policy Reform, IB Docket No. 11-80; Joint Petition for Rulemaking of AT&T Inc., Sprint Nextel Corp. and Verizon, RM-11322; IConnect Wholesale Inc. d/b/a TeleCuba Petition for Waiver of the International Settlements Policy and Benchmark Rate for Facilities-Based Telecommunications Services with Cuba, IB Docket No. 10-95; Modifying the Commission's Process to Avert Harm to U.S. Competition and U.S. Customers Caused by Anticompetitive Conduct, IB Docket No. 05-254

Dear Ms. Dortch:

On April 21, 2016, Jacquelynn Ruff of Verizon and I met with Denise Coca, Division Chief, David Krech, Associate Division Chief, Jodi L. Cooper, Attorney Advisor, of the Commission's Telecommunications & Analysis Division of the International Bureau, and by telephone with Kathleen Collins, Assistant Bureau Chief of the International Bureau.¹

In line with Verizon's comments previously filed in these proceedings,² we explained that while recent activity provides optimism for the introduction of more robust competition on the U.S.-Cuba route, the commercial environment for telecommunications in Cuba is still developing. We noted that many providers are still in the process of implementing agreements to serve Cuba directly. We explained that to date, the sole Cuban operator – ETECSA – has not negotiated rates at or near the Commission's established \$0.19 benchmark, instead charging U.S. carriers a rate of \$0.60 per minute.

Thus, we urged the Commission to maintain at least one of the tools – the nondiscrimination requirement – that it and U.S. carriers can use to maintain downward pressure on rates between the U.S. and Cuba. While we support the Commission's elimination of its rule-based requirement in 47 C.F.R. §62.22(f), we encouraged the Commission not to relax the

¹ Due to an inadvertent filing error, we request a waiver of the timing requirements of 47 C.F.R. 1.1206(b)(2)(iii) in connection with the filing of this ex parte notification.

² See, e.g., *International Settlements Policy Reform*, Comments of Verizon, IB Docket No. 11-80 (Apr. 4, 2016).

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nondiscrimination requirement found in the *TeleCuba Waiver Order*³ until the prevailing rate drops to, or there is substantial progress toward, the benchmark.

Please contact me if you need any additional information.

Very truly yours,



Katharine R. Saunders

cc: Kathleen Collins
Denise Coca
David Krech
Jodi Cooper

³ *IConnect Wholesale Inc. d/b/a TeleCuba Petition for Waiver of the International Settlements Policy and Benchmark Rate for Facilities-Based Telecommunications Services with Cuba*, Memorandum Opinion and Order, 26 FCC Rcd 5217 (IB 2011) (“*TeleCuba Waiver Order*”).