



CABLE & WIRELESS, INC.

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OFFICE OF THE SECRETARY**

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December 3, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, D.C. 20554

**RE: Oral Ex Parte Presentation
Section 1.1206(b)(2) Disclosure
International Bureau Docket No. 98-148**

Secretary Salas:

On December 3, 1998, Paul Kenefick of Cable & Wireless U.S.A., Inc. ("C&W USA") and Philip Permut of Kelley, Drye & Warren, representing C&W USA, made an oral ex parte presentation to Diane Cornell and Robert McDonald of the FCC's International Bureau concerning an issue pending in the above entitled docket.

C&W USA requested the Commission consider removing the benchmark settlement rate condition for nondominant carriers and for all carriers on routes where the Commission permits international simple resale. C&W USA stated removal of this condition will foster competition by allowing increased facilities based competition. Nondominant carriers do not have the requisite market power to adversely affect competition on affiliated routes and do not have the necessary control of costs to effectively engage in a price squeeze.

If you have any questions or comments concerning this disclosure or the presentation in general, please do not hesitate to contact me at 703-905-5785.

Sincerely,

Paul W. Kenefick
Regulatory Counsel

cc: Phil Permut
Diane Cornell
Robert McDonald

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