



ORIGINAL

December 22, 1999

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

**RE: BT North America Inc.
Ex Parte Presentation
IB Docket No. 98-192, FCC File No. 60-SAT-ISP-97**

Dear Ms. Salas:

BT North America Inc. ("BTNA") hereby notifies the Commission of an oral presentation on December 9, 1999 to Jim Ball, Michael McCain and Douglas Webbink in the International Bureau. The issues discussed in that meeting are consistent with BTNA's Petition for Waiver of the above-captioned proceeding's limitation on foreign Signatories and their affiliates from eligibility for direct access on certain routes. BTNA demonstrated through an economic analysis why the policies underlying that restriction would not be served when applied to BTNA. Specifically, BTNA demonstrated that BT and BTNA have no incentive – and indeed have strong disincentives – to engage in an effort to set INTELSAT Utilization Charges at artificially low levels. In addition to showing that BTNA does not present a risk to effective competition, BTNA demonstrated that its participation as a direct access user on all routes will serve the public interest.

Please direct any questions concerning this ex parte notification to the undersigned at 202-434-8882.

Respectfully submitted,

Eric H. Loeb
U.S. Regulatory Counsel

cc: Jim Ball, International Bureau
Michael McCain, International Bureau
Douglas Webbink, International Bureau

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