

ORIGINAL

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

EX PARTE OR LATE FILED

FACSIMILE

(202) 955-9792

www.kelleydrye.com

RECEIVED

NOV 13 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 13, 2001

NEW YORK, NY  
TYSONS CORNER, VA  
LOS ANGELES, CA  
CHICAGO, IL  
STAMFORD, CT  
PARSIPPANY, NJ  
BRUSSELS, BELGIUM  
HONG KONG  
AFFILIATE OFFICES  
BANGKOK, THAILAND  
JAKARTA, INDONESIA  
MANILA, THE PHILIPPINES  
MUMBAI, INDIA  
TOKYO, JAPAN

VIA COURIER

Dorothy Atwood  
Chief, Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Room 5-C345  
Washington, D.C. 20554

Re: Pay Telephone Reclassification and Compensation Provisions of the  
Telecommunications Act of 1996, CC Docket No. 96-128 NSD File No.  
L-99-34, Ex Parte Filing

Dear Ms. Atwood:

The International Prepaid Communications Association ("IPCA"), by its attorney, hereby submits this letter<sup>1</sup> to explain further its proposed method for resolving the issues raised by the pending petitions for reconsideration and/or clarification in this proceeding<sup>2</sup> with respect to the compensation of payphone service providers ("PSPs") under the Commission's recent *Second Order on Reconsideration*.<sup>3</sup>

<sup>1</sup> IPCA has filed this letter electronically and has served all named Commission Staff via e-mail and hand delivery.

<sup>2</sup> IPCA specifically addresses the proposal of WorldCom and AT&T that the underlying carrier owning the first switch reached by a payphone call remit PSP compensation on behalf of resellers for all calls, regardless of whether completed. See AT&T Petition for Clarification and/or Reconsideration at 2-3 (May 29, 2001); WorldCom, Inc. Petition for Declaratory Ruling and Petition for Reconsideration at 2-4 (May 29, 2001).

<sup>3</sup> *Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Second Order on Reconsideration, FCC 01-109 (rel. Apr. 5, 2001) ("Second Order on Reconsideration")*.

No. of Copies rec'd /  
1 / 10

In this proceeding, IPCA has proposed that the Commission adopt the following positions: (1) to allow SBRs to use billing clearinghouses to compensate PSPs directly, or in the alternative (2) to require IXCs to accept SBR call detail records demonstrating call completion rates and bill SBRs accordingly.<sup>4</sup> As a third-order solution, in the event that an IXC is unable or unwilling to accept SBR call completion data, IPCA proposes the use of a percent call completion (“PCC”) factor.<sup>5</sup> The PCC factor would work in the following manner: Each SBR would provide a company-specific PCC factor to its underlying IXC(s) based on its review of its call completion records. The SBRs would pay that proportion of PSP compensation out of the total number of payphone calls that reach the IXC’s switch.

Each PSP would retain the right to audit any SBR’s PCC factor to assess whether it accurately represents the number of completed calls. In addition, the PCC claimed by each SBR could be updated quarterly to account for changes in the completion factor and could be “trued up” annually to take into account any overpayment or underpayment of PSP compensation.

It is important that the PCC is calculated *on an SBR-by-SBR basis* because SBRs serve different demographics and, as a result, different markets. For example, a carrier who caters to clients calling the African continent will likely have a lower PCC than carriers catering to Western Europe where call completion rates are much higher. Similarly, carriers who market to customers making international calls will have much lower completion rates than carriers whose customers call mostly domestically.

To illustrate this point, IPCA has attached, in summary form (Exhibit 1) and on individual carrier basis (Exhibit 2), call completion data from several of its members.<sup>6</sup> Each SBR has provided the call completion percentage for each destination, and the percentage of calls from payphones that calls to that particular country represent.<sup>7</sup> This data demonstrates how call completion rates vary from SBR to SBR depending on the demographics they serve. Finally, any PCC must also take into account the percentage of “abandoned calls” – specifically, those calls that reach the SBR platform, but for which no destination number is entered. Accordingly, if the Commission were to adopt a PCC figure, that figure must be calibrated according to each SBRs completion rate in order to ensure that SBRs are paying PSP compensation for completed calls only.

---

<sup>4</sup> See IPCA Initial Comments at 9-11 (Oct. 9, 2001); IPCA Reply Comments at 7-9 (Oct. 24, 2001).

<sup>5</sup> See IPCA Comments at 12-14; IPCA Reply Comments at 11-13.

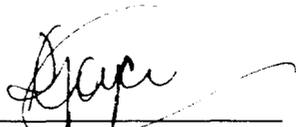
<sup>6</sup> Due to the highly sensitive nature of this information, IPCA is unable to identify any carrier that provided call completion data. Omitting carrier names enables IPCA to file this letter as a public document and avoid seeking to seal this part of the record. IPCA further requests confidential treatment of this information on behalf of its members such that it not be identified in any manner other than as that of switch-based resellers.

Dorothy Atwood  
November 13, 2001  
Page Three

IPCA cautions the Commission, however, that if it chooses to adopt a PCC based on an industry average, then it must provide SBRs with the ability to "opt out" of that PCC. That is, where an SBR determines that its call completion rates are different than the industry average PCC, it must be permitted to notify the underlying carrier, through commercially reasonable means, that it will apply its own and not on the average industry PCC factor.

Please do not hesitate to contact me if you have any questions or concerns regarding this filing.

Respectfully submitted,

By:   
Stephanie A. Joyce  
Kelley, Drye & Warren LLP  
1200 19<sup>th</sup> Street, N.W., Suite 500  
Washington, D.C. 20036  
202.955.9600  
202.955.9792 fax

*Counsel to International Prepaid  
Communications Association*

cc: Chairman Michael K. Powell  
Commissioner Michael J. Copps  
Commissioner Kevin J. Martin  
Commissioner Kathleen Q. Abernathy  
Jeffrey Carlisle, Senior Deputy Bureau Chief  
Diane Griffin Harmon, Assistant Bureau Chief  
Christopher D. Libertelli  
Tania J. Cho

# EXHIBIT 1

**SUMMARY OF CALL COMPLETION RATES**

	Domestic PCC	% Traffic Domestic	International PCC	% Traffic International	Weighted Average
Carrier 1	63.0%	18%	37%	82%	40%
Carrier 2			30%		
Carrier 3			0.91%-62.48%	0%-100%	
Carrier 4	64%				
Carrier 5	58.48%	24%	27.56%	53.30%	28.95%

# EXHIBIT 2

Carrier 1.

Analysis of average completion rates for three months ending October 31, 2001

Completion rate for domestic calls:	63%
Completion rate for international calls:	37%
Average completion rate for all calls:	40%

Because

82% of call attempts were for international destinations

18% of call attempts were domestic destinations

Carrier 2.

Provided no specific information but said that they have an international completion rate of 30%.

<b>Totals</b>	
<b>Destination</b>	<b>Answer %</b>
Afghanistan	9.11%
Alaska	6.90%
Albania	24.81%
Algeria	20.52%
American Samoa	48.75%
Andorra	20.83%
Angola	23.75%
Anguilla	34.33%
Antarctica - Scott	1.80%
Antigua	36.92%
Argentina	35.32%
Argentina - Buenos Aires	0.91%
Argentina - Cellular	45.52%
Armenia	22.95%
Aruba	36.55%
Ascension Island	3.62%
Australia	50.42%
Australia - Cellular	47.52%
Austria	27.06%
Austria - Cellular	34.61%
Austria - Vienna	35.80%
Azerbaijan	26.06%
Bahamas	58.28%
Bahrain	26.16%
Bangladesh	21.62%
Bangladesh - Chittagong	28.18%
Bangladesh - Dhaka	25.15%
Barbados	48.50%
Belarus	19.78%
Belgium	24.63%
Belgium - Antwerp	39.08%
Belgium - Brussels	49.15%
Belgium - Cellular	42.10%
Belize	35.27%

<b>Benin</b>	<b>37.76%</b>
<b>Bermuda</b>	<b>43.87%</b>
<b>Bhutan</b>	<b>39.51%</b>
<b>Bolivia</b>	<b>35.33%</b>
<b>Bolivia - La Paz</b>	<b>29.27%</b>
<b>Bolivia - Santa Cruz</b>	<b>43.96%</b>
<b>Bosnia</b>	<b>29.48%</b>
<b>Botswana</b>	<b>37.47%</b>
<b>Brazil</b>	<b>33.65%</b>
<b>Brazil - Cellular</b>	<b>33.15%</b>
<b>Brazil - Rio de Janeiro</b>	<b>46.95%</b>
<b>Brazil - Rio de Janeiro (Cellular)</b>	<b>34.67%</b>
<b>Brazil - Sao Paulo</b>	<b>51.16%</b>
<b>Brazil - Sao Paulo (Cellular)</b>	<b>40.57%</b>
<b>British Virgin Islands</b>	<b>30.79%</b>
<b>Brunei</b>	<b>23.16%</b>
<b>Bulgaria</b>	<b>31.62%</b>
<b>Bulgaria - Cellular</b>	<b>19.08%</b>
<b>Burkina Faso</b>	<b>28.42%</b>
<b>Burundi</b>	<b>22.51%</b>
<b>Cambodia</b>	<b>24.81%</b>
<b>Cambodia - Phnom Penh</b>	<b>22.84%</b>
<b>Cameroon</b>	<b>32.19%</b>
<b>Canada</b>	<b>61.83%</b>
<b>Cape Verde</b>	<b>32.78%</b>
<b>Caribbean</b>	<b>1.77%</b>
<b>Cayman Island</b>	<b>46.34%</b>
<b>Central African Republic</b>	<b>23.09%</b>
<b>Chad</b>	<b>33.75%</b>
<b>Chile</b>	<b>39.97%</b>
<b>Chile - Cellular</b>	<b>17.45%</b>
<b>Chile - Santiago (Cellular)</b>	<b>9.24%</b>
<b>China</b>	<b>34.05%</b>
<b>China - Beijing</b>	<b>44.90%</b>
<b>China - Cellular</b>	<b>22.91%</b>
<b>China - Chenjdu</b>	<b>42.86%</b>

China - Fuzhou	38.34%
China - Guangzhou	40.89%
China - Qing dao	58.69%
China - Shanghai	45.14%
China - Shen Zhen	50.96%
Christmas Island	0.00%
Colombia	34.65%
Colombia - Armenia	41.97%
Colombia - Baranquilla	42.09%
Colombia - Barranquilla	57.89%
Colombia - Bogota	38.57%
Colombia - Cali	42.07%
Colombia - Cellular	51.79%
Colombia - Manizales	37.69%
Colombia - Medellin	51.66%
Colombia - Pereira	55.34%
Comoros	1.36%
Congo	20.04%
Cook Island	6.88%
Costa Rica	37.05%
Costa Rica - Cellular	58.00%
Croatia	35.48%
Cuba	7.35%
Cyprus	29.85%
Czechoslovakia	31.10%
Denmark	30.13%
Denmark - Cellular	25.63%
Diego Garcia	13.61%
Djibouti	7.27%
Domestic	71.19%
Dominica	49.49%
Dominican Rep	50.76%
Ecuador	20.11%
Ecuador - Cellular	49.71%
Ecuador - Cuenca	40.51%
Ecuador - Guayaquil	46.11%

Ecuador - Quito	36.45%
Egypt	24.49%
Egypt - Cairo	35.95%
Egypt - Cellular	30.46%
El Salvador	30.71%
El Salvador - Cellular	40.32%
Equatorial Guinea	26.42%
Eritrea	31.67%
Estonia	38.81%
Ethiopia	19.20%
Faeroe Islands	1.74%
Falkland Is	8.08%
Fiji Islands	44.04%
Finland	50.05%
Finland - Cellular	43.35%
Fr Antilles	12.62%
Fr Guiana	25.96%
Fr Polynesia	29.71%
France	62.21%
France - Cellular	46.02%
France - Paris	55.62%
Gabon	40.45%
Gambia	41.51%
Georgia	36.75%
Germany	51.35%
Germany - Cellular	42.59%
Ghana	25.00%
Gibraltar	24.20%
Greece	39.36%
Greece - Athens	48.85%
Greece - Cellular	50.04%
Greenland	14.43%
Grenada	35.09%
Guadeloupe	35.48%
Guam	45.60%
Guantanamo Bay	4.87%
Guatemala	32.01%

Guatemala - Cellular	21.49%
Guinea	22.70%
Guinea Bissau	10.19%
Guyana	30.49%
Haiti	26.20%
Haiti - Cellular	2.44%
Hawaii	29.12%
Honduras	19.42%
Hong Kong	29.54%
Hong Kong - Cellular	56.43%
Hungary	38.30%
Iceland	44.02%
Iceland - Cellular	34.89%
India	37.26%
India - Bangalore	32.70%
India - Bombay	40.55%
India - Calcutta	47.99%
India - Cellular	26.37%
India - Madras	26.77%
India - New Delhi	34.55%
India - New Delhi (Cellular)	11.23%
Indonesia	46.09%
Indonesia - Cellular	49.37%
Indonesia - Jakarta	48.27%
International	0.00%
Interstate	9.70%
Iran	23.69%
Iraq	20.34%
Ireland	55.88%
Ireland - Cellular	43.97%
Israel	50.35%
Israel - Cellular	54.80%
Italy	53.46%
Italy - Cellular	30.44%
Italy - Milam	0.62%
Ivory Coast	47.31%

Jamaica	37.45%
Japan	60.96%
Japan - Cellular	33.83%
Japan - Military	46.95%
Japan - Osaka	61.76%
Japan - Tokyo	75.72%
Jordan	32.94%
Jordan - Amman	26.04%
Jordan - Cellular	37.55%
Kazakhstan	23.78%
Kenya	41.04%
Kenya - Nairobi	33.59%
Kiribati	21.38%
Korea North	3.26%
Korea South	28.06%
Korea South - Cellular	39.85%
Korea South - Seoul	50.31%
Kuwait	24.46%
Kyrgystan	17.91%
Laos	34.67%
Latvia	37.01%
Lebanon	31.37%
Lebanon - Cellular	34.30%
Lesotho	24.45%
Liberia	19.56%
Libya	12.10%
Liechtenstein	2.00%
Lithuania	50.93%
Luxembourg	15.80%
Luxembourg - Cellular	27.47%
Macao	33.33%
Macedonia	29.28%
Madagascar	17.99%
Malawi	38.25%
Malaysia	41.99%
Malaysia - Johor Bahru	42.86%
Malaysia - Kuala Lumpur	46.60%

Maldives	20.75%
Mali	8.94%
Malta	29.41%
Marisat - Atlantic	5.43%
Marisat - Indian	5.38%
Marisat - Pacific	0.98%
Marshall Islands	21.42%
Mauritania	21.03%
Mauritius	25.56%
Mayotte Island	10.53%
Mexico	0.00%
Mexico - Guadalajara	39.68%
Mexico - Monterrey	36.24%
Mexico Band 1	42.17%
Mexico Band 2	44.01%
Mexico Band 3	44.77%
Mexico Band 4	41.99%
Mexico Band 5	40.00%
Mexico Band 525 (Mexico City)	39.83%
Mexico Band 6	38.15%
Mexico Band 7	38.88%
Mexico Band 8	34.60%
Micronesia	12.51%
Moldova	20.37%
Monaco	11.97%
Mongolia	20.92%
Montserrat	53.72%
Morocco	28.59%
Mozambique	10.81%
Myanmar/Burma	9.24%
Nakhodka	28.80%
Namibia	32.94%
Nauru	0.00%
Nepal	32.68%
Neth Antilles	29.00%
Netherland Antilles -	40.94%

Curaca	
Netherlands	49.11%
Netherlands - Cellular	44.01%
Nevis Is	60.56%
New Caledonia	6.62%
New Zealand	54.87%
New Zealand - Cellular	39.31%
Nicaragua	38.76%
Nicaragua - Cellular	39.13%
Niger	25.16%
Nigeria	21.68%
Nigeria - Lagos	21.11%
Niue	1.74%
Norfolk	0.00%
Norway	45.23%
Norway - Cellular	31.10%
Norway - Oslo	50.37%
Oman	35.40%
Pakistan	35.14%
Pakistan - Karachi	28.78%
Palau	18.30%
Palestine	5.90%
Panama	18.64%
Panama - Cellular	52.58%
Panama - Chiriqui	12.95%
Panama - Panama City	28.84%
Papua New Guinea	29.27%
Paraguay	36.72%
Peru	23.61%
Peru - Cellular	27.89%
Peru - Lima	38.80%
Philippines	45.62%
Philippines - Cellular	43.17%
Philippines - Manila	50.31%
Poland	45.66%
Poland - Warsaw	47.50%
Portugal	43.17%

Portugal - Cellular	34.25%
Portugal - Lisbon	52.83%
Portugal - Madeira Island	54.72%
Puerto Rico	45.51%
Qatar	23.09%
Republic Of Yemen	18.36%
Reunion Island	19.88%
Romania	48.29%
Romania - Bucharest	25.44%
Russia	28.65%
Russia - Moscow	50.60%
Russia - Moscow Overlay	15.38%
Russia - St. Petersburg	38.06%
Rwanda	19.20%
Saipan	28.73%
Sakhalin	29.53%
San Marino	6.56%
Sao Tome	1.34%
Saudi Arabia	33.99%
Senegal	32.59%
Seychelles	7.92%
Sierra Leone	27.47%
Singapore	48.57%
Slovakia	41.51%
Slovenia	44.13%
Solomon Island	4.35%
Somalia	12.07%
South Africa	42.24%
South Africa - Cape Town	54.39%
South Africa - Cellular	59.46%
South Africa - Johannesburg	50.65%
Spain	55.77%
Spain - Barcelona	49.04%
Spain - Cellular	42.19%
Spain - Madrid	0.18%
Sri Lanka	20.28%

St Helena	0.00%
St Kitts	0.00%
St Lucia	62.48%
St Pierre/Miquel	0.90%
St Vincent	45.62%
Sudan	24.98%
Suriname	21.55%
Swaziland	19.09%
Sweden	43.78%
Sweden - Cellular	35.34%
Switzerland	43.48%
Switzerland - Cellular	35.65%
Syria	23.03%
Taiwan	44.90%
Taiwan - Cellular	39.58%
Taiwan - Kaohsiung	51.46%
Taiwan - Taipei	44.05%
Tajikistan	0.00%
Tanzania	25.72%
Thailand	37.90%
Thailand - Bangkok	49.21%
Togo	33.17%
Tokelau	0.00%
Tonga	18.13%
Trinidad/Tobago	28.55%
Tunisia	39.50%
Turkey	19.67%
Turkey - Ankara	34.84%
Turkey - Cellular	34.96%
Turkey - Istanbul	43.22%
Turkmenistan	24.71%
Turks And Caicos	39.04%
Tuvalu	4.00%
U A E	32.91%
U.S. Virgin Island	14.79%
Uganda	35.95%
UK	54.95%

UK - Cellular	31.78%
Ukraine	35.84%
Uruguay	47.69%
Uruguay - Montevideo	51.25%
USVI/Puerto Rico	1.33%
Uzbekistan	21.72%
Vanuatu	2.04%
Vatican City	0.00%
Venezuela	18.42%
Venezuela - Caracas	30.13%
Venezuela - Cellular	49.63%
Vietnam	22.62%
Vietnam - Ho Chi Minh	26.95%
Wake Island	0.00%
Wallis/Futuna	0.00%
Western Samoa	7.20%
Yugoslavia	30.24%
Zaire	16.53%
Zambia	46.89%
Zimbabwe	43.68%

Carrier 4:

**DOMESTIC CALL COMPLETION RATES: 64% (COMPLETED)/36% UNCOMPLETED**

**INTERNATIONAL CALL COMPLETION DATA:**

Country Name	Completed	Uncompleted
	Calls	Calls
	%	%
20Egypt	50%	50%
27South Africa	80%	20%
30Greece	100%	0%
31Netherlands	69%	31%
32Belgium	80%	20%
33France	54%	46%
34Spain	33%	67%
36Hungary	50%	50%
39Italy	29%	71%
40Romania	71%	29%
41Switzerland	78%	22%
44United Kingdom	61%	39%
45Denmark	80%	20%
46Sweden	52%	48%
47Norway	81%	19%
48Poland	74%	26%
49Germany	61%	39%
51Peru	22%	78%
52Mexico	41%	59%
54Argentina	90%	10%
55Brazil	52%	48%
56Chile	33%	67%
57Colombia	80%	20%
58Venezuela	52%	48%
60Malaysia	50%	50%
61Australia	63%	37%
62Indonesia		50%
63Philippines	50%	50%
64New Zealand	30%	70%
81Japan	82%	18%
86China	40%	60%
90Turkey	31%	69%
91India	33%	67%
94Sri Lanka	0%	100%
95Myanmar	0%	100%
98Iran	0%	100%

212	Morocco	100%	0%
225	Ivory Coast	0%	100%
234	Nigeria	25%	75%
239	Sao Tome and Principe	0%	100%
261	Madagascar	0%	100%
297	Aruba	100%	0%
351	Portugal	100%	0%
353	Ireland	75%	25%
370	Lithuania	11%	89%
374	Armenia	50%	50%
375	Belarus	100%	0%
380	Ukraine	0%	100%
420	Czech Republic	55%	45%
502	Guatemala	71%	29%
503	El Salvadore	0%	100%
504	Honduras	31%	69%
507	Panama	0%	100%
591	Bolivia	0%	100%
592	Guyana	0%	100%
597	Suriname	0%	100%
678	Vanuatu	0%	100%
683	Niue	50%	50%
852	Hong Kong	50%	50%
855	Cambodia	0%	100%
874	Marisat West Atlantic Ocean	33%	67%
886	Taiwan	60%	40%
961	Lebanon	50%	50%
962	Jordan	33%	67%
963	Syria	0%	100%
965	Kuwait	20%	80%
971	United Arab Emirates	33%	67%
972	Israel	100%	0%
995	Georgia	0%	100%

## Payphone Analysis - Summary

Destination	Calls	
	Distribution	ASR
<b>DOMESTIC</b>	<b>24%</b>	<b>58.48%</b>
<b>INTERNATIONAL</b>	<b>53.3%</b>	<b>27.56%</b>
<b>ABANDONED</b>	<b>22.3%</b>	<b>0.00%</b>
<b>GRAND TOTAL</b>	<b>100%</b>	<b>28.95%</b>

**Abandoned Calls** are calls sent to the SBR switch however the customer does not proceed to dialing a destination.  
**Call Distribution** identifies route-specific volume (in %) of total calls.  
**ASR** (Answer Seizure Ratio) represents call completion rate.

## Payphone Analysis

Destination	Calls	
	Distribution **	ASR ***
AK	0.01%	46.99%
AL	0.17%	55.79%
AL -DirAsst	0.00%	100.00%
AR	0.06%	58.60%
AR -DirAsst	0.00%	0.00%
AZ	0.34%	57.23%
AZ -DirAsst	0.00%	33.33%
CA	2.58%	60.94%
CA -DirAsst	0.00%	53.03%
CO	0.16%	59.66%
CO -DirAsst	0.00%	100.00%
CT	0.41%	61.20%
CT -DirAsst	0.00%	44.44%
DC	0.26%	61.79%
DC -DirAsst	0.00%	100.00%
DE	0.26%	56.65%
DE -DirAsst	0.00%	100.00%
FL	3.49%	56.80%
FL -DirAsst	0.00%	65.00%
GA	0.81%	54.24%
GA -DirAsst	0.00%	75.00%
IA	0.06%	49.61%
ID	0.03%	52.35%
ID -DirAsst	0.00%	100.00%
IL	0.67%	59.31%
IL -DirAsst	0.00%	59.09%
IN	0.17%	59.47%
IN -DirAsst	0.00%	66.67%
KS	0.06%	53.42%
KS -DirAsst	0.00%	33.33%
KY	0.16%	50.01%
KY -DirAsst	0.00%	100.00%
LA	0.16%	54.73%
LA -DirAsst	0.00%	100.00%
MA	0.95%	60.76%
MA -DirAsst	0.00%	81.25%
MD	1.20%	61.03%
MD -DirAsst	0.00%	53.85%
ME	0.07%	61.51%
ME -DirAsst	0.00%	70.59%
MI	0.42%	60.43%
MI -DirAsst	0.00%	61.54%
MN	0.20%	54.14%
MN -DirAsst	0.00%	100.00%
MO	0.12%	56.73%

MO -DirAsst	0.00%	80.00%
MS	0.13%	56.24%
MS -DirAsst	0.00%	83.33%
MT	0.01%	62.75%
MT -DirAsst	0.00%	100.00%
NC	0.84%	56.15%
NC -DirAsst	0.00%	50.00%
ND	0.01%	52.33%
NE	0.05%	57.84%
NH	0.12%	60.61%
NH -DirAsst	0.00%	38.10%
NJ	2.15%	60.11%
NJ -DirAsst	0.00%	48.28%
NM	0.06%	54.60%
NM -DirAsst	0.00%	66.67%
NV	0.12%	63.01%
NV -DirAsst	0.00%	100.00%
NY	3.17%	59.24%
NY -DirAsst	0.00%	54.55%
OH	0.46%	60.06%
OH -DirAsst	0.00%	46.67%
OK	0.08%	59.30%
OK -DirAsst	0.00%	100.00%
OR	0.10%	59.21%
OR -DirAsst	0.00%	100.00%
PA	1.00%	59.01%
PA -DirAsst	0.00%	67.74%
RI	0.09%	58.40%
RI -DirAsst	0.00%	100.00%
SC	0.28%	57.86%
SC -DirAsst	0.00%	100.00%
SD	0.02%	58.85%
TN	0.24%	55.26%
TN -DirAsst	0.00%	50.00%
TX	1.24%	55.60%
TX -DirAsst	0.00%	70.59%
VA	0.88%	57.00%
VA -DirAsst	0.00%	40.00%
VT	0.03%	48.36%
WA	0.18%	57.77%
WA -DirAsst	0.00%	66.67%
WI	0.17%	60.14%
WI -DirAsst	0.00%	57.14%
WV	0.07%	58.72%
WV -DirAsst	0.00%	100.00%
WY	0.01%	45.66%
WY -DirAsst	0.00%	100.00%
<b>DOMESTIC</b>	<b>24%</b>	<b>58.48%</b>

Afghanistan	0.00%	5.56%
Albania	0.08%	25.28%
Algeria	0.06%	23.26%
Algeria - Cellular	0.00%	0.00%
American Samoa	0.00%	45.45%
American Samoa - Cel	0.00%	66.67%
Andorra	0.00%	20.00%
Angola	0.01%	19.27%
Anguilla	0.00%	18.75%
Antarctica - Norfolk	0.00%	0.00%
Antigua(Barbuda)	0.01%	33.04%
Antigua(Barbuda) - C	0.00%	6.25%
Argentina	0.08%	31.30%
Argentina - B. A. Ce	0.08%	43.18%
Argentina - Buenos A	0.00%	20.00%
Argentina - Cellular	0.09%	36.56%
Argentina - Cordoba	0.02%	41.43%
Argentina - Mendoza	0.00%	0.00%
Armenia	0.01%	9.80%
Armenia - Cellular	0.01%	47.01%
Aruba	0.00%	34.43%
Ascension Island	0.00%	0.00%
Australia	0.02%	35.09%
Australia - Adelaide	0.02%	46.67%
Australia - Australi	0.00%	0.00%
Australia - Brisbane	0.01%	50.97%
Australia - Canberra	0.00%	0.00%
Australia - Cellular	0.01%	36.15%
Australia - Melbourn	0.02%	45.14%
Australia - Perth	0.00%	0.00%
Australia - Sydney	0.04%	46.92%
Austria	0.01%	33.08%
Austria Cellular	0.01%	44.76%
Austria-Vienna	0.00%	31.18%
Azerbaijan	0.00%	10.00%
Azores	0.00%	0.00%
Bahamas	0.09%	33.04%
Bahrain	0.00%	33.73%
Bahrain - Cellular	0.00%	25.00%
Bangladesh	0.02%	13.08%
Bangladesh - Chittag	0.00%	27.27%
Bangladesh - Sylket	0.00%	6.67%
Bangladesh Cellular	0.00%	9.80%
Bangladesh Dhaka	0.04%	17.24%
Barbados	0.05%	30.50%
Belarus	0.05%	25.91%
Belarus - Cellular	0.00%	12.50%
Belgium	0.01%	28.31%
Belgium - Antwerp	0.00%	25.93%
Belgium - Brussels	0.00%	46.46%
Belgium - Kortrijk	0.00%	59.18%

Belgium - Lueven	0.00%	40.00%
Belgium / Antwerp	0.00%	54.55%
Belgium / Brussels	0.00%	47.73%
Belgium /Lueven	0.00%	100.00%
Belgium Cellular	0.01%	22.95%
Belize	0.03%	37.74%
Benin	0.00%	6.86%
Bermuda	0.01%	32.00%
Bhutan	0.00%	0.00%
Bolivia	0.02%	40.74%
Bolivia - Cellular	0.01%	52.11%
Bolivia - Cochabamba	0.01%	28.00%
Bolivia - La Paz	0.01%	28.35%
Bolivia - Santa Cruz	0.02%	29.95%
Bosnia	0.01%	13.72%
Bosnia - Sarajevo	0.00%	15.00%
Botswana	0.01%	31.67%
Brazil	0.21%	25.42%
Brazil - Belo Cellul	0.00%	38.98%
Brazil - Belo Horizo	0.02%	29.76%
Brazil - Cellular	0.01%	19.64%
Brazil - Curitiba	0.02%	11.46%
Brazil - Porto Alegr	0.00%	24.53%
Brazil - Sao Paulo	0.02%	34.60%
Brazil - Sao Paulo C	0.02%	32.53%
Brazil -Rio	0.04%	27.92%
Brazil -Rio Cellular	0.01%	37.13%
British Virgin Islan	0.00%	23.21%
Brunei	0.00%	25.00%
Brunei - Cellular	0.00%	33.33%
Bulgaria	0.10%	33.38%
Bulgaria - Cellular	0.02%	24.83%
Bulgaria - Sofia	0.01%	29.58%
Burkina Faso	0.01%	24.38%
Burundi	0.00%	17.14%
Burundi - Bujumbura	0.00%	18.29%
Cambodia	0.00%	32.43%
Cambodia - Cellular	0.02%	39.66%
Cameroon	0.04%	29.53%
Cameroon - Douala	0.00%	34.38%
Canada	0.01%	57.74%
Canada - Alberta(403	0.02%	53.07%
Canada - Alberta(780	0.01%	46.93%
Canada - British Col	0.06%	50.15%
Canada - Manitoba(20	0.01%	53.62%
Canada - New Brunswi	0.01%	37.18%
Canada - New Foundla	0.00%	27.45%
Canada - Nova Scotia	0.02%	58.48%
Canada - Ontario - O	0.02%	52.43%
Canada - Ontario - T	0.15%	58.70%
Canada - Ontario(519	0.03%	62.88%
Canada - Ontario(705	0.01%	55.56%

Canada - Ontario(807	0.00%	42.86%
Canada - Ontario(905	0.06%	51.58%
Canada - Quebec - Mo	0.12%	57.18%
Canada - Quebec(418)	0.01%	55.22%
Canada - Quebec(450)	0.01%	52.90%
Canada - Quebec(819)	0.01%	58.60%
Canada - Saskatchewan	0.00%	58.88%
Canada - Yukon/NWT(8	0.00%	25.81%
Cape Verde Island	0.19%	23.21%
Caribbean	0.00%	22.22%
Carribbean	0.26%	48.34%
Casero PBX Transfer	0.02%	45.63%
Cayman Islands	0.01%	34.40%
Central African Rep	0.01%	15.94%
Chad	0.00%	13.46%
Chad - Audiotext	0.00%	0.00%
Chile	0.02%	31.94%
Chile - Cellular	0.00%	4.55%
Chile - Celular	0.00%	12.50%
Chile - Concepcion	0.01%	45.09%
Chile - Easter Islan	0.03%	50.95%
Chile - Rancagua	0.01%	39.67%
Chile - Santiago	0.04%	47.71%
Chile Audiotext	0.04%	43.24%
Chile, Santiago	0.01%	50.00%
China	0.04%	27.41%
China - Cellular	0.01%	13.94%
China - Chengdu	0.00%	60.00%
China - Dalian	0.00%	20.00%
China - GSM	0.00%	25.69%
China - Guangzhou	0.01%	31.67%
China - Qing Dao	0.00%	0.00%
China - Shenzhen	0.00%	55.26%
China - Tian Jin	0.01%	40.68%
China Beijing	0.01%	35.68%
China Fuzhou	0.00%	31.65%
China Shanghai	0.01%	52.14%
Cocos Island	0.00%	0.00%
Colombia	0.15%	39.94%
Colombia - Armenia	0.20%	47.18%
Colombia - Barran Re	0.00%	11.67%
Colombia - Bucaraman	0.05%	29.56%
Colombia - Buenavent	0.01%	40.37%
Colombia - Cartagena	0.02%	38.88%
Colombia - Cartago	0.00%	0.00%
Colombia - Cucuta	0.01%	57.59%
Colombia - Ibaque	0.01%	57.98%
Colombia - Manizales	0.05%	40.02%
Colombia - Palmira	0.00%	13.33%
Colombia - Pasto	0.01%	14.20%
Colombia - Popayan	0.02%	47.92%
Colombia - Sta. Mart	0.00%	56.82%

Colombia - Tolima	0.00%	0.00%
Colombia Barranquill	0.04%	50.11%
Colombia Bogota	0.29%	34.59%
Colombia Cali	0.39%	30.38%
Colombia Cellular	0.17%	36.56%
Colombia Medellin	0.30%	43.24%
Colombia Pereira	0.19%	40.46%
Comoros	0.00%	0.00%
Comoros - Mayotte Is	0.00%	0.00%
Congo	0.00%	14.77%
Cook Island	0.00%	0.00%
Costa Rica	0.34%	26.62%
Costa Rica - Cellula	0.01%	37.45%
Costa Rica - San Jos	0.10%	26.34%
Croatia	0.05%	30.26%
Croatia - Cellular	0.00%	40.00%
Cuba	0.19%	7.77%
Cuba - Guantanamo	0.00%	2.86%
Cyprus	0.01%	44.35%
Cyprus - Cellular	0.00%	60.00%
Czech Rep Audiotex	0.00%	0.00%
Czech Republic	0.38%	35.41%
Czech Republic - Cel	0.02%	20.61%
Czech Republic Pragu	0.03%	37.33%
Denmark	0.02%	44.15%
Denmark - Cellular	0.01%	12.50%
Diego Garcia	0.00%	0.00%
Djibouti	0.00%	13.33%
Djibouti - Cellular	0.00%	0.00%
Dominica	0.01%	53.37%
Dominican Rep	0.74%	51.86%
Dominican Rep Audio	0.00%	21.43%
Dominican Rep Cell	0.01%	49.83%
Dominican Republic	0.02%	41.58%
Ecuador	0.87%	32.48%
Ecuador - Porta	0.00%	0.00%
Ecuador - Portov	0.02%	23.28%
Ecuador Cellular	0.40%	32.50%
Ecuador Cuenca	0.29%	26.04%
Ecuador Guayaquil	0.22%	29.19%
Ecuador Quito	0.15%	24.16%
Egypt	0.10%	22.53%
Egypt - Alexandria	0.08%	18.11%
Egypt - Cairo	0.10%	31.78%
Egypt Cellular	0.08%	26.50%
El Salvador	0.94%	26.35%
El Salvador - Cellul	0.17%	32.79%
Equi Guinea	0.00%	11.32%
Eritrea	0.02%	36.24%
Estonia	0.00%	44.55%
Estonia - Cellular	0.00%	37.31%
Ethiopia	0.05%	27.82%

Ethiopia - Addis Aba	0.12%	31.23%
Ethiopia - Cellular	0.01%	29.19%
Faeroe Island	0.00%	0.00%
Falkland Islands	0.00%	17.31%
Fiji Islands	0.00%	48.10%
Finland	0.00%	10.34%
Finland - Cellular	0.01%	15.44%
Finland - Helsinki	0.00%	22.22%
France	0.04%	42.43%
France - (On-net)	0.06%	43.89%
France - Bordeaux	0.00%	44.30%
France - Lyon	0.01%	39.02%
France - Marseille	0.00%	63.89%
France - Nice	0.00%	55.26%
France - Paris	0.08%	41.41%
France - Toulouse	0.00%	52.31%
France Cellular	0.07%	38.54%
French Antilles	0.00%	23.81%
French Antilles - Ma	0.00%	5.17%
French Guiana	0.00%	4.00%
French Polynesia	0.00%	29.41%
Gabon	0.00%	22.92%
Gabon - Cellular	0.00%	100.00%
Gambia	0.11%	30.24%
Georgia	0.00%	21.62%
Georgia - Audiotex	0.00%	44.44%
Germany	0.20%	43.51%
Germany - Berlin	0.02%	52.08%
Germany - Cellular	0.07%	37.41%
Germany - Dusseldorf	0.00%	57.14%
Germany - Frankfurt	0.01%	37.82%
Germany - Hamburg	0.02%	42.66%
Germany - Mannheim	0.00%	38.64%
Germany - Munich	0.01%	47.00%
Germany GSM	0.00%	3.13%
Ghana	0.12%	32.19%
Ghana - Accra	0.07%	35.12%
Ghana - Cellular	0.05%	30.07%
Gibraltar	0.00%	5.88%
Greece	0.04%	30.55%
Greece - Athens Sp.S	0.00%	28.57%
Greece - Saloniki	0.00%	44.59%
Greece Athens	0.03%	45.65%
Greece Cellular	0.04%	26.29%
Grenada	0.01%	43.48%
Guadeloupe	0.01%	16.20%
Guam	0.00%	20.00%
Guantanamo Bay	0.00%	0.00%
Guatemala	3.59%	17.17%
Guatemala - Cellular	0.53%	20.28%
Guinea	0.09%	7.14%
Guinea - Audiotext	0.03%	3.94%

Guinea Bissau	0.01%	6.23%
Guyana	0.01%	20.63%
Guyana - Audio	0.02%	22.25%
Haiti	1.20%	27.42%
Haiti - Audiotext	0.00%	0.00%
Haiti - Cellular	0.08%	23.23%
Haiti - Port au Prin	0.14%	34.01%
Honduras	4.29%	12.86%
Honduras - Cellular	0.20%	12.07%
Honduras - Tegucigai	0.60%	18.74%
Hong Kong	0.00%	0.00%
Hong Kong - Audiotex	0.01%	45.08%
Hong Kong - Cellular	0.01%	31.28%
Hungary	0.04%	47.41%
Hungary - Cellular	0.02%	24.85%
Iceland	0.00%	15.38%
India	0.21%	27.86%
India - Ahmadabad	0.01%	31.13%
India - Bangalore	0.01%	29.27%
India - Baroda	0.01%	19.25%
India - Bombay	0.04%	16.65%
India - Calcutta	0.01%	16.88%
India - Hydrabad	0.00%	41.67%
India - Madras	0.01%	34.03%
India - New Delhi	0.03%	23.42%
India - New Delhi Ce	0.00%	16.67%
India Cellular	0.01%	26.89%
Indonesia	0.04%	31.12%
Indonesia - Cellular	0.01%	28.45%
Indonesia-Jakarta	0.03%	38.98%
Inmarsat Alt East	0.00%	0.00%
Inmarsat Alt West	0.00%	0.00%
Inmarsat Indian	0.00%	0.00%
Inmarsat Pacific	0.00%	9.09%
Inmarsat SNAC	0.00%	0.00%
Intl	0.21%	11.74%
Intl.	0.01%	6.72%
Iran	0.02%	33.85%
Iraq	0.03%	16.44%
Ireland	0.33%	48.89%
Ireland - Dublin	0.11%	58.60%
Ireland Cellular	0.14%	51.27%
Iridium	0.00%	0.00%
Israel	0.02%	36.55%
Israel - Jerusalem	0.10%	44.34%
Israel - Palestine	0.00%	12.50%
Israel Cellular	0.06%	45.88%
Israel Tel Aviv	0.02%	48.09%
Italy	0.18%	36.10%
Italy - Milan	0.00%	5.56%
Italy - Rome	0.02%	45.98%
Italy - Turin	0.00%	30.00%

Italy Cellular	0.11%	29.87%
Ivory Coast	0.11%	26.84%
Jamaica	1.21%	26.59%
Jamaica - Cellular	0.19%	33.07%
Japan	0.03%	39.92%
Japan - Nagoya	0.00%	35.29%
Japan - Okinawa	0.01%	42.25%
Japan - Osaka	0.00%	41.38%
Japan - Osaka Cellul	0.01%	28.29%
Japan - Osaka Milita	0.00%	50.79%
Japan - Sapporo	0.00%	43.18%
Japan - Tokyo	0.00%	25.00%
Japan - Tokyo Cellul	0.00%	28.05%
Japan - Tokyo Milita	0.00%	40.00%
Japan - Tokyo On Net	0.01%	45.56%
Japan - Tokyo Suburb	0.02%	54.97%
Japan Cellular	0.02%	25.56%
Jordan	0.06%	35.04%
Jordan - Amman	0.08%	35.81%
Jordan - Audiotext	0.00%	50.00%
Jordan Cellular	0.04%	23.41%
Kazakhstan	0.00%	7.14%
Kenya	0.44%	26.46%
Kenya - Nairobi	0.15%	30.40%
Kiribati	0.00%	25.00%
Kiribati - Audio	0.00%	0.00%
Korea, North	0.00%	5.56%
Korea, South	0.02%	39.37%
Korea, South - Cellu	0.01%	39.66%
Korea, South - Seoul	0.01%	56.00%
Kuwait	0.00%	23.16%
Kuwait - Cellular	0.03%	25.00%
Kyrgyzstan	0.00%	33.33%
Kyrgyzstan - Russian	0.00%	0.00%
Kyrgyzstan Cellular	0.00%	17.65%
Laos	0.08%	31.09%
Latvia	0.05%	20.44%
Latvia - Cellular	0.00%	46.30%
Lebanon	0.08%	14.02%
Lebanon Cellular	0.10%	27.23%
Lesotho	0.00%	0.00%
Liberia	0.12%	13.08%
Liberia - Cellular	0.00%	0.00%
Libya	0.01%	15.73%
Liechtenstein	0.00%	0.00%
Liechtenstein - Cell	0.00%	0.00%
Liechtenstein - Two	0.00%	0.00%
Lithuania	0.06%	36.46%
Lithuania - Cellular	0.02%	24.41%
Luxembourg	0.00%	20.00%
Luxembourg - Cellula	0.00%	0.00%
Macau	0.00%	50.00%

Macedonia	0.08%	28.25%
Macedonia - Cellular	0.00%	41.67%
Madagascar	0.00%	0.00%
Madagascar - Antana	0.00%	0.00%
Madagascar - Audio	0.00%	0.00%
Madagascar - Cellula	0.00%	0.00%
Malawi	0.01%	5.98%
Malaysia	0.01%	19.64%
Malaysia - Cellular	0.01%	32.82%
Malaysia - Johor Bah	0.00%	37.50%
Malaysia - KL	0.01%	30.95%
Maldives	0.00%	1.82%
Mali Republic	0.07%	16.65%
Malta	0.01%	30.22%
Malta - Cellular	0.00%	0.00%
Mariana Island/Saipa	0.00%	45.83%
Marshall Island	0.00%	10.71%
Mauritania	0.00%	16.25%
Mauritius	0.01%	15.75%
Mexico	0.31%	17.89%
Mexico - Acapulco	0.04%	32.08%
Mexico - Aguas Calie	0.10%	25.85%
Mexico - Cancun	0.02%	24.50%
Mexico - Celaya	0.09%	28.00%
Mexico - Cellular	0.34%	25.01%
Mexico - Chihuahua	0.03%	30.51%
Mexico - Ciudad Juar	0.05%	32.79%
Mexico - Cuernavaca	0.09%	34.99%
Mexico - Culiacan	0.03%	37.87%
Mexico - Guadalajara	0.25%	31.88%
Mexico - Hermosillo	0.03%	33.33%
Mexico - Irapuato	0.05%	30.97%
Mexico - Leon	0.10%	23.73%
Mexico - Los Mochis	0.01%	36.07%
Mexico - Mazatlan	0.02%	35.86%
Mexico - Merida	0.02%	28.27%
Mexico - Mexicali	0.03%	32.67%
Mexico - Mexico City	1.74%	29.55%
Mexico - Monterey	0.15%	37.89%
Mexico - Nuevo Lared	0.02%	29.75%
Mexico - Pueblo	0.14%	26.43%
Mexico - Queretaro	0.06%	30.31%
Mexico - Reynosa	0.02%	34.29%
Mexico - Saltillo	0.01%	30.09%
Mexico - San Luis Po	0.11%	29.24%
Mexico - Tampico	0.06%	31.08%
Mexico - Tijuana	0.09%	35.45%
Mexico - Toluca	0.05%	27.47%
Mexico - Torreon	0.07%	33.65%
Mexico - Veracruz	0.07%	26.85%
Mexico - Villahermos	0.01%	35.82%
Mexico Band 1	0.28%	25.64%

Mexico Band 2	0.04%	33.33%
Mexico Band 3	0.13%	26.07%
Mexico Band 4	0.19%	22.87%
Mexico Band 5	0.50%	28.82%
Mexico Band 6	2.63%	25.40%
Mexico Band 7	4.93%	27.70%
Mexico Band 8	2.33%	23.73%
Micronesia	0.00%	2.41%
Moldova	0.00%	18.18%
Moldova - Cellular	0.00%	0.00%
Monaco	0.03%	11.09%
Monaco - Cellular	0.00%	14.29%
Mongolia	0.00%	24.00%
Montserrat	0.00%	18.75%
Morocco	0.58%	16.80%
Morocco - Cell	0.00%	0.00%
Mozambique	0.00%	2.33%
Mozambique - Maputo	0.00%	37.50%
Myanmar (Burma)	0.04%	29.43%
Namibia	0.00%	50.00%
Nauru	0.00%	0.00%
Nepal	0.01%	31.40%
Netherlands	0.03%	47.98%
Netherlands - Amster	0.00%	61.90%
Netherlands - Cellul	0.03%	38.64%
Netherlands - Rotter	0.00%	56.60%
Netherlands - The Ha	0.01%	21.60%
Netherlands - Utrech	0.00%	60.47%
Netherlands Antilles	0.02%	17.87%
Nevis	0.00%	0.00%
New Caledonia	0.00%	50.00%
New Zealand	0.00%	24.27%
New Zealand - Auklan	0.00%	29.81%
New Zealand - Cellul	0.00%	37.04%
New Zealand - Wellin	0.00%	40.00%
Nicaragua	0.10%	28.76%
Nicaragua - Cellular	0.15%	28.99%
Nicaragua - Managua	0.00%	50.00%
Niger Rep	0.02%	28.28%
Nigeria	0.46%	22.93%
Nigeria - Cellular	0.00%	13.64%
Nigeria - Lagos-Cell	0.03%	15.25%
Nigeria Lagos	0.26%	23.17%
Niue Island - Audiot	0.00%	0.00%
North Korea	0.00%	0.00%
Norway	0.01%	38.82%
Norway - Cellular	0.00%	28.57%
Norway - Oslo	0.01%	63.45%
Oman	0.00%	24.53%
Pakistan	0.01%	21.65%
Pakistan - Cellular	0.00%	20.29%
Pakistan - Islamabad	0.00%	29.03%

Pakistan - Karachi	0.04%	14.84%
Pakistan - Lahore	0.04%	22.43%
Pakistan - P	0.07%	32.26%
Pakistan - P - Cellu	0.01%	36.03%
Pakistan - P - Islam	0.04%	25.65%
Palau	0.00%	0.00%
Panama	0.03%	39.32%
Panama Cellular	0.04%	22.10%
Panama City	0.04%	45.36%
Papua New Guinea	0.00%	10.00%
Paraguay	0.01%	52.41%
Paraguay - Asuncion	0.00%	57.84%
Paraguay - Cellular	0.00%	15.79%
Peru	0.02%	10.42%
Peru - Cellular	0.04%	36.02%
Peru Lima	0.13%	39.61%
Peru Lima Cellular	0.24%	21.29%
Philippines	0.13%	29.38%
Philippines - Cebu	0.02%	33.33%
Philippines - Cellul	0.18%	27.95%
Philippines - Manill	0.10%	28.44%
Phillippines Manilla	0.00%	39.74%
Poland	0.32%	42.43%
Poland - Cellular	0.16%	29.63%
Poland - Katowice	0.03%	45.14%
Poland - Krakow	0.04%	42.68%
Poland - Warsaw	0.04%	41.01%
Portugal	0.00%	15.38%
Portugal - Azores	0.03%	24.41%
Portugal - Lisbon	0.00%	0.00%
Portugal - Madeira	0.00%	23.29%
Portugal - Madeira C	0.00%	11.76%
Portugal - Porto	0.02%	42.12%
Portugal Cellular	0.00%	0.00%
Promotion	0.00%	100.00%
Promotion Mastercard	0.02%	1.56%
Puerto Rico	0.32%	36.10%
Puerto Rico Cellular	0.04%	39.05%
Puerto Rico -DirAsst	0.00%	100.00%
Qatar	0.01%	15.76%
Qatar - Cellular	0.00%	29.63%
Reunion Island	0.00%	4.76%
Romania	0.20%	39.10%
Romania - Bucharest	0.05%	40.79%
Romania - Cellular	0.12%	48.67%
Russia	0.25%	28.68%
Russia - Cellular	0.00%	24.14%
Russia - Combeliga	0.00%	0.00%
Russia - Kazakhstan	0.01%	1.71%
Russia - Moscow 1	0.03%	45.73%
Russia - Moscow 2	0.01%	27.74%
Russia - Moscow 3	0.00%	50.00%

Russia - Nakhoda	0.00%	0.00%
Russia - Overlay	0.00%	0.00%
Russia - Sakhalin Is	0.02%	39.30%
Russia - Samara	0.00%	13.33%
Russia - St. Peter	0.02%	35.77%
Rwanda	0.02%	19.73%
Rwanda - Cellular	0.00%	51.22%
San Marino	0.00%	0.00%
Sao Tome	0.00%	14.29%
Saudi Arabia	0.07%	29.46%
Saudi Arabia - Cellu	0.02%	37.58%
Saudi Arabia - Riyad	0.02%	34.76%
Senegal Republic	0.13%	25.45%
Senegal Republic - C	0.04%	16.56%
Serbia	0.00%	7.41%
Seychelles	0.00%	0.00%
Sierra Leone	0.27%	20.47%
Sierra Leone - Audio	0.07%	27.76%
Singapore	0.01%	40.19%
Singapore - Cellular	0.00%	36.25%
Slovakia	0.14%	21.03%
Slovenia	0.00%	22.50%
Slovenia - Cellular	0.00%	41.18%
Solomon Islands	0.00%	0.00%
Somalia	0.31%	10.65%
South Africa	0.03%	38.83%
South Africa - Cape	0.01%	34.48%
South Africa - Cellu	0.02%	41.80%
South Africa - Johan	0.01%	28.63%
South Korea	0.21%	47.33%
South Korea- Cellula	0.28%	40.87%
South Korea- Seoul	0.15%	56.58%
Spain	0.04%	35.22%
Spain - Balearic Isl	0.00%	47.22%
Spain - Barcelona	0.02%	52.70%
Spain - Bilbao	0.01%	48.72%
Spain - Canary Islan	0.00%	17.24%
Spain - Cellular	0.11%	34.20%
Spain - Ceuta	0.00%	0.00%
Spain - Gerona	0.00%	29.41%
Spain - Madrid	0.02%	45.31%
Spain - Mallorca	0.01%	52.54%
Spain - Tarragona	0.00%	45.24%
Spain - Valencia	0.01%	49.27%
Sri Lanka	0.01%	10.20%
Sri Lanka - Cellular	0.01%	5.24%
St Helena	0.00%	25.00%
St. Kitts	0.00%	53.33%
St. Lucia	0.01%	36.74%
St. Pierre/Miquelon	0.00%	0.00%
St. Vincent/Gren	0.01%	16.11%
Sudan	0.18%	22.95%

Suriname	0.00%	10.17%
Suriname - Audio	0.00%	0.00%
Suriname - Cellular	0.00%	4.81%
Swaziland	0.00%	0.00%
Sweden	0.03%	39.55%
Sweden - Cellular	0.01%	30.06%
Sweden - Stockholm	0.01%	34.39%
Switzerland	0.03%	40.58%
Switzerland - Bern	0.01%	29.46%
Switzerland - Cellul	0.02%	14.16%
Switzerland - Geneva	0.01%	35.19%
Switzerland - Zurich	0.01%	47.84%
Syria	0.18%	33.25%
Taiwan	0.01%	49.67%
Taiwan - Kaohsiung	0.00%	40.63%
Taiwan - Tainan	0.00%	60.71%
Taiwan - Taipei	0.02%	39.72%
Taiwan Cellular	0.02%	25.77%
Tajikistan	0.00%	0.00%
Tajikistan - Cellula	0.00%	100.00%
Tanzania	0.04%	16.41%
Thailand	0.02%	27.85%
Thailand - Cellular	0.02%	33.24%
Thailand - Pattaya	0.00%	39.47%
Thailand Bangkok	0.01%	41.11%
Togo	0.02%	25.90%
Tokelau	0.00%	0.00%
Tonga	0.00%	21.43%
Trinidad/Tobago	0.13%	30.85%
Trinidad/Tobago - Ce	0.00%	30.61%
Tunisia	0.29%	35.15%
Turkey	0.12%	37.29%
Turkey - Ankara	0.02%	42.82%
Turkey - Istanbul	0.04%	39.17%
Turkey Cellular	0.07%	40.17%
Turkmenistan	0.00%	0.00%
Turks and Caicos	0.00%	11.43%
Tuvalu	0.00%	11.11%
Tuvalu - Cellular	0.00%	0.00%
UAE	0.04%	23.69%
UAE - Cellular	0.04%	13.69%
Uganda	0.15%	37.82%
UK	0.37%	52.98%
UK - Cellular	0.37%	35.45%
UK - London	0.00%	0.00%
UK - sprint	0.00%	13.33%
UK sprint	0.00%	29.52%
Ukraine	0.10%	19.38%
Ukraine - Cellular	0.00%	8.33%
Ukraine - Kiev	0.01%	23.61%
Ukraine - Odessa	0.05%	22.51%
Union Island	0.00%	3.23%

United States - Alas	0.02%	33.90%
United States - Hawa	0.04%	24.81%
Uruguay	0.02%	20.30%
Uruguay - Montevideo	0.01%	9.84%
US Virgin Islands	0.02%	31.91%
USA	0.44%	18.70%
USA -DirAsst	0.00%	37.50%
UT	0.05%	59.68%
UT -DirAsst	0.00%	100.00%
Uzbekistan	0.00%	12.07%
Vanuatu	0.00%	0.00%
Vanuatu - Audiotex	0.00%	9.52%
Vatican City	0.00%	0.00%
Venezuela	0.07%	11.91%
Venezuela - Audiotex	0.05%	18.17%
Venezuela - Barquisi	0.00%	7.69%
Venezuela - Caracas	0.34%	21.71%
Venezuela - Cellular	0.11%	38.82%
Venezuela - Cristbol	0.01%	21.88%
Venezuela - Maracaib	0.00%	10.26%
Venezuela - Maricay	0.00%	5.00%
Venezuela - Valencia	0.03%	13.32%
Vietnam	0.04%	23.83%
Vietnam - Cellular	0.01%	17.80%
Vietnam - Hanoi	0.01%	5.02%
Vietnam HCM	0.00%	3.45%
Wallis & Futuna	0.00%	0.00%
Western Samoa	0.00%	4.35%
Yemen Arab Rep	0.11%	24.03%
Yemen Demo Republic	0.00%	0.00%
Yugoslavia	0.03%	33.02%
Yugoslavia - Cellula	0.01%	23.84%
Zaire	0.02%	11.82%
Zaire - Cellular	0.00%	19.23%
Zaire - Kinshasa	0.02%	9.52%
Zambia	0.01%	42.49%
Zanzibar	0.00%	0.00%
Zimbabwe	0.02%	34.97%
Zimbabwe - Cellular	0.00%	27.27%
<b>INTERNATIONAL</b>	<b>53.3%</b>	<b>27.56%</b>
No Destination	22.30%	0.00%
<b>ABANDONED *</b>	<b>22.3%</b>	<b>0.00%</b>
<b>GRAND TOTAL</b>	<b>100%</b>	<b>28.95%</b>

\* Abandoned Calls are calls sent to the SBR switch however the customer does not proceed to dialing a destination.

\*\* Call Distribution identifies route-specific volume (in %) of total calls.

\*\*\* ASR (Answer Seizure Ratio) represents call completion rate.