

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | IB Docket No. 03-38 |
| Bayan Telecommunications Company |) | |
| Digital Telecommunications Philippines, Inc. |) | |
| Globe Telecom, Inc. |) | |
| Philippines Long Distance Telephone Company |) | |
| Smart Communications, Inc. |) | |
| Subic Telecom |) | |
| |) | |
| AT&T Emergency Petition for Settlements |) | |
| Stop Payment Order and Request for |) | |
| Immediate Interim Relief |) | |

**AT&T OPPOSITION TO
MOTIONS FOR EXTENSION OF TIME.**

AT&T Corp. (“AT&T”) hereby submits this Opposition to the Emergency Request for Extension of Time filed by the Philippines Long Distance Telephone Company (“PLDT”), on February 19, 2003, and to the Motions to Extend Time filed by Globe Telecom (“Globe”) and Verizon, also on February 19, 2003. As AT&T stated in its Emergency Petition for Settlements Stop Payment Order and request for Immediate Interim Relief, filed on February 7, 2003, PLDT, Globe, and other foreign carriers in the Philippines, Digital Telecommunications Philippines, Inc. (“Digital”), Bayan Telecommunications Company (“Bayantel”), Smart Communications, Inc. (“Smart”) and Subic Telecom (“Subic”), are blocking AT&T traffic to the Philippines in support of an attempted 50 percent increase in termination rates in blatant violation of the Commission’s longstanding prohibition on whipsawing. Nine days after the issuance of the Commission’s Public Notice on this matter, PLDT and Globe continue to illegally block virtually all calls by AT&T customers to the Philippines. Indeed, PLDT has

extended its circuit blockage of AT&T's traffic and is now blocking all operator-handled calls in addition to all direct dialed calls.

These foreign carriers fail to show good cause for more than a minimal extension of the 10-day comment period provided by the Public Notice in this matter released on February 10, 2003. PLDT, which is represented by two established Washington D.C. law firms in this matter, requests a five-day extension until February 25, 2003, contending (p. 2) that its counsel were "unable to access their offices" on two days of the ten-day comment period in this matter, specifically February 16, a Sunday, and February 17, a public holiday. They further allege "difficulty" in working from home on those days, and "great difficulty electronically sending and receiving documents (particularly between the U.S. and the Philippines)" -- the direct result, no doubt, of the very conduct at issue in this matter. Globe and Verizon request a four-day extension, until February 24, 2003, because of the closing of their counsel's office on February 18.

AT&T submits that no more than a one-day extension is warranted here, until February 21, 2003, to take account of the office closings on February 18, when the Commission was also closed. As AT&T described in its emergency petition, the unjustified actions of these carriers in blocking circuits is causing substantial direct and ongoing harm to AT&T's customers and to AT&T and requires immediate Commission action to protect the U.S. public interest. AT&T also demonstrated that a 7-day period of public comment, rather than the 10-days provided here, is warranted in these circumstances and supported by Commission precedent. Because of these circumstances, no more than a very brief extension should be awarded here. Additionally, any party filing comments pursuant to any extension should be required to serve all other parties by fax or e-mail no later than 5 p.m. on the day comments are due, to lessen the

impact on the period for the filing of reply comments.

Any extension granted here that is likely to delay final action in this proceeding would also add further urgency to AT&T's request for the issuance of a stop payment order as immediate interim relief. As AT&T showed in its request for such relief in its emergency petition, interim relief is fully supported by the criteria used by the Commission evaluate requests for interim relief and necessary to prevent existing and ongoing harm to AT&T's customers and AT&T.

Respectfully submitted,

AT&T CORP.

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Dated: February 19, 2003.

CERTIFICATE OF SERVICE

I, Karen Kotula, hereby certify that on this 19th day of February, 2003, a copy of the "AT&T Emergency Petition for Settlements Stop Payment Order and Request for Immediate Interim Relief" was delivered by first class mail to the persons listed below.

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