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March 23, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW,  
Room TWB-204  
Washington, DC 20554

Attention: Mr. James Ball,  
Chief, Policy Division,  
International Bureau.

*Re: Request for further information regarding IB Dockets 03-38, 02-324, 96-261*

Dear Ms. Dortch:

At the request of Commission Staff, AT&T Corp. ("AT&T") provides the following additional information concerning its interim arrangements with Philippines carriers.

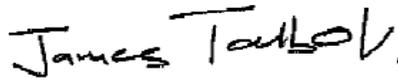
Since the Commission issued notices in 2003 and early 2004 lifting the suspension of payments to Philippine carriers, AT&T has provided service to the Philippines under interim arrangements. AT&T has been required to use these arrangements because AT&T has been unable to negotiate ISP-compliant arrangements with any Philippine carrier. Notably, because commercial arrangements were well-established on this route prior to 2003, and all Philippine carriers are no doubt well aware that termination arrangements for U.S.-inbound traffic are readily available from a wide variety of third-country foreign carriers at market-based rates, AT&T has

been unable to obtain any agreement by these carriers to pay symmetrical settlement rates for their U.S-bound traffic.

AT&T's interim arrangements with the Philippine Long Distance Company ("PLDT") would become final if the Commission removed the ISP from the route and allowed commercial arrangements between U.S. and Philippine carriers. While AT&T's current arrangements with PLDT do not provide for retroactive modification, and AT&T's current arrangements with other Philippine carriers also make no such provision, AT&T continues to engage in periodic negotiations with the Philippine carriers and does not know whether any modification to those arrangements will result from these negotiations or will be agreed once it is possible to move past this interim stage. All arrangements are subject to all required governmental approvals.

Please contact the undersigned with any questions concerning this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "James Talbot". The signature is written in a cursive, slightly slanted style.

James J. R. Talbot  
Senior Attorney

cc: Kimberly Cook, International Bureau  
Mark Uretsky, International Bureau  
Claudia Fox, International Bureau  
Mitchell F. Brecher, Counsel for International Access, Inc.  
Craig Silliman, MCI  
Gregory C. Staple, Counsel for Bayan Telecommunications, Inc.  
David A. Nall, Sprint  
Henry Goldberg, Counsel for Philippines Long Distance Telephone Company, Inc.  
Ronald Olivar Solis, Commissioner, National Telecommunications Commission, Republic of the Philippines.