

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT
1229 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN L. WIENER
BRITA D. STRANDBERG
LAURA A. STEFANI

(202) 429-4900
TELECOPIER:
(202) 429-4912
e-mail:
general@g2w2.com
website: www.g2w2.com

HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL

May 27, 2005

By Hand Delivery

James Ball
Chief, Policy Division
International Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20054

Re: IB Docket Nos. 03-38, 02-324 and 96-261
Response to Letter from James Ball, Chief, Policy Division,
International Bureau, dated May 13, 2005

Dear Mr. Ball:

In the above-referenced letter, you requested information concerning letters of discontinuance, dated March 17, 2005. The letters of discontinuance had been filed by PLDT (US) Ltd. ("PLDT US") and PLDT Retail, Inc. ("PLDT Retail"), which is a subsidiary of PLDT US.¹ You have asked what international services PLDT US and its subsidiaries continue to provide following the discontinuances that were reported in the March 17 letters.

¹ Although your letter was addressed to the Philippine Long Distance Telephone Company, the services at issue were provided by PLDT US and PLDT Retail, and we are responding based on information provided to us by PLDT US.

PLDT Retail has terminated all of its international common carrier prepaid calling card services.² Neither PLDT Retail, PLDT US, nor any other PLDT subsidiary currently provides international common carrier prepaid calling card services to distributors or end users.³

PLDT US continues to provide international private line and switched access transport in conjunction with private lines services. No discontinuance letters have been filed concerning these services.

PLDT US has stopped providing "wholesale" international services specifically from the United States to the Philippines.⁴ PLDT US continues, however, to provide wholesale international services on other routes.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Henry Goldberg

Henry Goldberg
Joseph A. Godles
Attorneys for Philippine Long Distance
Telephone Company

cc: Kimberly Cook, FCC
Mark Uretsky, FCC
Claudia Fox, FCC
Attached service list

² As stated in its March 17 letter, PLDT Retail terminated these services in accordance with the requirements of Section 63.19 of the rules.

³ An affiliate of PLDT US sells on its Web site, on an agency basis, the prepaid calling cards of a carrier that is not affiliated with PLDT US.

⁴ As stated in its March 17 letter, PLDT US terminated these services in accordance with the requirements of Section 63.19 of the rules (*i.e.*, PLDT US provided the requisite notice to customers for wholesale services on the United States-Philippines route).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter was sent by first-class mail, postage prepaid, this 27th day of May, 2005, to the each of the following:

Mitchell F. Brecher, *Counsel for*
International Access, Inc.
d/b/a Access International
Greenberg Traurig, LLP
800 Connecticut Avenue, NW
Suite 500
Washington, DC 20006

James J.R. Talbot
AT&T Corp.
1120 20th Street, NW
Washington, DC 20036

Craig Silliman
MCI, Inc.
1133 19th Street, NW
Washington, DC 20036

Gregory C. Staple, *Counsel for*
Banyan Telecommunications, Inc.
Vinson & Elkins LLP
1455 Pennsylvania Avenue, NW
Washington, DC 20004-1008

David A. Nall
Sprint Corporation
401 9th Street, NW
Suite 400
Washington, DC 20004

Ronald Olivar Solis
Commissioner
Republic of the Philippines
Department of Transportation and Communications
National Telecommunications Commission
BIR Road, East Triangle, Quezon City

/s/Candace Gentry
Candace Gentry