



Marybeth M. Banks  
Director

**Federal Regulatory Affairs**  
Voice 202 585 1908  
401 9th Street, Northwest, Suite 400  
Washington, D.C. 20004

June 29, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: In the Matter of the Reporting Requirements for U.S. Providers of  
International Telecommunications Services, IB Docket No. 04-112

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. §1.206, Sprint Communications Company L.P. hereby submits this letter summarizing an *ex parte* presentation by Verizon, AT&T, Sprint and Tyco yesterday, June 28, 2005, in the above-referenced docket. Doug Schoenberger and Jim Talbot from AT&T, Jacquelynn Ruff and Leslie Owsley from Verizon, Kent Bressie (Harris, Wiltshire & Grannis) representing Tyco Telecom, and David Nall and I from Sprint met with Anna Gomez, Jim Ball, Brad Lerner, David Krech, Jacki Ponti and Samuel Castor of the International Bureau.

Our discussion focused on the purpose of reporting given that the international telecommunications market is highly competitive. Today's international market has been shaped by the 1996 Communications Act, the GATS, and the Commission's pro-competitive orders, including its *Benchmarks Order*<sup>1</sup> and its *ISP Reform Order*.<sup>2</sup> The increased liberalization of foreign markets has served to further promote competition throughout the world. Indeed, the Commission has lifted its International Settlements Policy from 164 countries. The current competitiveness is marked by extremely low rates to most international countries. U.S. carriers now have the option of any number of routes to reach foreign countries; and capacity is sold on submarine cable rings that reach multiple countries, without regard to where on the ring the traffic will terminate.

We suggested that this highly competitive market does not require the same type of regulatory reporting that was required in the days of higher accounting rates prior to the *Benchmarks Order* and the *ISP Reform Order*. The usefulness of the reports is limited by the length of time required by the carriers to produce them and by the Commission's

---

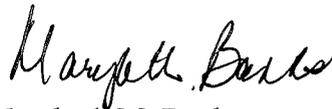
<sup>1</sup> *International Settlement Rates*, IB Docket No. 96-261, *Report and Order*, 12 FCC Rcd 19806 (1997)(*Benchmarks Order*), *aff'd sub. nom.*, *Cable & Wireless*, No. 97-1612 (D.C. Cir. Jan. 12, 1999).

<sup>2</sup> *International Settlements Policy Reform; International Settlement Rates*, IB Docket Nos. 02-324 and 96-261, *First Report and Order*, 19 FCC Rcd 5709 (2004) (*ISP Reform Order*).

staff to analyze them and produce the reports. The timeliness of the reports is unlikely to improve if additional data and more complicated categorization of traffic are required of carriers, as proposed by the Commission in its NPRM. The proposals in the NPRM for additional data will increase the cost of preparing the reports. For example, the new service categories for the § 43.82 report will be difficult for many carriers to identify in their existing data bases. We also pointed out that many other countries, including Australia, Canada and the United Kingdom, have lifted their reporting requirements. The Commission should take a fresh look at the reporting requirements and should follow the international trend and lift the burden on U.S. carriers of detailed international reporting.

Some of the recent international issues were reviewed and the relevance of the information provided by carriers pursuant to the Section 43 reports was discussed. It was suggested that the Commission could seek route-specific information to analyze specific instances in response to complaints that anti-competitive behavior might be occurring. U.S. carriers are not hesitant to provide, and in fact volunteer, information in these situations. For analyses of transfers of licenses or other authorizations, the parties to the transactions will have the burden to provide specific information to the Commission to assist in its analysis.

Respectfully submitted,



Marybeth M. Banks

cc: Anna Gomez  
Jim Ball  
David Krech  
Brad Lerner  
Jacki Ponti  
Samuel Castor