Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

	)	
In the Matter of	)	
	)	
Request for Additional Information	)	
Regarding the Rate Integration Plan	)	CC Docket No. 96-61
Filed by the American Samoa	)	
Telecommunications Authority	)	
	)	

COMMENTS OF AT&T

Pursuant to the Commission's Public Notice (DA 06-295, released February 6, 2006 ("Public Notice")), AT&T Inc.'s long distance affiliates AT&T Corp. and SBC Long Distance LLC dba SBC Long Distance (hereinafter jointly referred to as "AT&T"), submit the following comments on the American Samoa Telecommunications Authority's ("ASTCA's") rate integration plan.

ASTCA reports that it has now implemented the principal measure necessary to enable other carriers to begin their own plans for providing rate integrated service for American Samoa; participation in the North American Numbering Plan ("NANP").[1] As a result, it seeks to have the suspension of rate integration obligations for American Samoa lifted. AT&T is currently reviewing the time and costs required to make the substantial systems changes that will be

[1] Although ASTCA indicates that it also provides Feature Group D access switched services to IXCs, nearly all domestic carriers, including AT&T, do not have a Point of Presence ("POP") in American Samoa and therefore cannot obtain Feature Group D access to serve those islands. (*See ex parte* letter from David L. Sieradzki, Hogan & Hartson, to Marlene H. Dortch, dated October 31, 2005 at 3 ("ASTCA offers Feature Group D switched access services at tariffed NECA rates charges *only* to IXCs that choose to establish physical points of presence (POPs) within American Samoa") (emphasis in original). Accordingly, call completion functions between AT&T and ASTCA are currently provided pursuant to pre-existing settlements arrangements.

necessary to integrate its rates for calls between American Samoa and other domestic points. Although AT&T's total current annual revenues for calls associated with American Samoa are only about $1.8 million, AT&T believes that changes will be needed to at least 25 different billing and related systems in order to implement rate integration, and that the costs of making such changes may be highly disproportional to the related revenues.

AT&T further notes that the Commission's initial *Rate Averaging/Integration Order*[2] provided carriers with 12 months to achieve rate integration to the offshore points covered by that order.[3] Because the prior work done to integrate AT&T's rates for other offshore points is not directly applicable to American Samoa, AT&T estimates that it will likely take at least the same amount of time to implement rate integration for American Samoa. Thus, if the Bureau should decide to issue a subsequent order requiring rate integration for American Samoa,[4] it should allow carriers at least 12 months for implementation. Further, given the distinct possibility that the costs of implementing rate integration may be extraordinarily high compared

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[2] *Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation of Section 254(g) of the Communications Act of 1934, as amended*, CC Docket No. 96-61, *Report and Order* 11 FCC Rcd 9564 (1996).

[3] *Id*. ¶ 68 (order released August 7, 1996, preliminary rate integration plans submitted February 1, 1997, final plans submitted June 1, 1997 and rate integration operational by August 1, 1997).

[4] *See* Public Notice at 3.

to the revenues generated from calls with American Samoa, AT&T may deem it necessary to seek a limited waiver of any rate integration that may be ordered.[5]

Respectfully submitted,

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5 AT&T also notes that AT&T Corp. (but not SBC Long Distance) provides a limited number of calling card and toll-free services from those islands, which generate only about $150,000 in annual revenues. All such originating traffic requires the use of 8YY dialing. However, ASTCA has no mechanism in place that allows it to route 8YY calls to the carrier selected by the billed party. As a result, all of AT&T Corp.'s American Samoa-originated traffic must be placed using 8YY codes that ASTCA has dedicated to AT&T, and AT&T cannot provide other American Samoa-originated calls using 8YY codes that ASTCA has not pre-designated.