

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

Proposal to Remove Certain Non-U.S.-Licensed )  
Satellites From the Exclusion List for Global )  
International Section 214 ) IB Docket No. 07-23  
Authorization Purposes )

**COMMENTS OF AT&T INC.**

AT&T Inc., on behalf of its affiliates, (“AT&T”) hereby submits the following comments on the Public Notice released on January 18, 2007 inviting comment on a proposal to remove certain non-U.S.-licensed satellites from the Section 214 Exclusion List.<sup>1</sup> AT&T strongly supports the proposal of the International Bureau to allow U.S. carriers with global facilities-based authorizations to provide international services over all non-U.S.-licensed satellites allowed to enter the U.S. market under DISCO II procedures. The further streamlining of the Section 214 authorization process would stimulate increased competition in the U.S. market and also should encourage streamlining measures by other countries to increase foreign market opportunities for U.S. carriers.

Since 1996, U.S. carriers with global facilities-based international 214 authorizations have been authorized to use all U.S.-licensed facilities, and all non-U.S.-licensed submarine cable facilities, without filing Section 214 applications for each facility.<sup>2</sup> In addition, since 1999, these U.S. carriers also have been authorized to use all non-U.S.-licensed satellites on the

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<sup>1</sup> Public Notice, *International Bureau Invites Comment on a Proposal to Remove Certain Non-U.S.-Licensed Satellites From the Exclusion List for Global International Section 214 Authorization Purposes*, DA 07-100, rel. Jan. 18, 2007 (“Notice”).

<sup>2</sup> *Streamlining the International Section 214 Authorization Process and Tariff Requirements*, 11 FCC Rcd. 12884 (1996).

Permitted Space Station List, which includes all C- and Ku-band satellites allowed to provide service to the U.S. under DISCO II procedures.<sup>3</sup> These streamlining measures have facilitated U.S. carrier access to a broader range of international facilities, stimulated greater competition in the U.S. international market, and encouraged lower prices for consumers.

AT&T welcomes and supports the Bureau's proposal to expand the facilities included in global facilities-based Section 214 authorizations to include all other non-U.S.-licensed satellites allowed to enter the U.S. market under DISCO II procedures, such as MSS satellites and those operating in the L-, Ka- or V- bands. Further streamlining of the Section 214 authorization process in this way would allow the accelerated deployment of a broader range of satellite services to U.S. consumers, thus enhancing competition and user choice in the U.S. international market. The adoption of the Bureau's proposal also would further reduce U.S. market entry procedures for non-U.S.-licensed satellites, and should therefore encourage other countries to streamline authorization procedures to facilitate U.S. carrier entry into their markets.

Respectfully submitted,

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<sup>3</sup> *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, 15 FCC Rcd. 7207 (1999).