

## **REQUEST FOR CONFIDENTIAL TREATMENT**

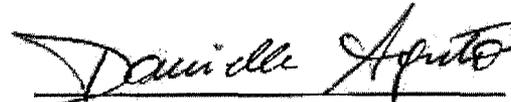
Pursuant to Section 0.459 of the Federal Communications Commission's ("FCC's") Rules, 47 C.F.R. § 0.459, France Telecom Long Distance USA, LLC ("FTLD"), by its undersigned representative, respectfully requests confidential treatment of certain information contained in the attached Response ("Response") to the FCC's Letter from John V. Giusti, Acting Chief, International Bureau ("Letter"), dated February 18, 2009, IB Dkt. No. 09-10.

Pursuant to Section 0.459(b) of the FCC's Rules, FTLD provides the following information:

1. The information for which FTLD requests confidential treatment of is as follows:
  - a. Responses of FTLD to the Questions contained in the FCC's Letter.
2. FTLD is providing such information as directed by the FCC in its Letter in IB Dkt. No. 09-10, dated February 18, 2009.
3. The confidential information contains proprietary and highly confidential information concerning FTLD and FTLD's affiliated companies which is not contained in any public document.
4. The confidential information is concerning international telecommunications services which are subject to competition.
5. Disclosure of this information will cause FTLD to suffer a competitive disadvantage in the negotiation of contracts for goods and services and impair its ability to compete in the marketplace for international services if this information is available to its vendors, suppliers and competitors.
6. In order to prevent public disclosure, each page of such document is stamped "CONFIDENTIAL". A redacted version of the Response will be filed in the public record.
7. The confidential information is not currently publicly available. Such information has only been disclosed to counsel of FTLD, and FTLD employees.

8. The confidential information should not be available for public disclosure indefinitely.
9. The factual information contained in this Request for Confidential Treatment is true and correct to the best of my information, knowledge and belief.

Respectfully submitted,

  
\_\_\_\_\_  
Danielle Aguto, Secretary

Date: March 2, 2009

**Asia**  
**Pacific**  
Bangkok  
Beijing  
Hanoi  
Ho Chi Minh City  
Hong Kong  
Jakarta  
Kuala Lumpur  
Manila  
Melbourne  
Shanghai  
Singapore  
Sydney  
Taipei  
Tokyo

**Europe & Middle East**  
Almaty  
Amsterdam  
Antwerp  
Bahrain  
Baku  
Barcelona  
Berlin  
Bologna  
Brussels  
Budapest  
Cairo  
Dusseldorf  
Frankfurt / Main  
Geneva  
Kyiv  
London  
Madrid  
Milan  
Moscow  
Munich  
Paris  
Prague  
Riyadh  
Rome  
St. Petersburg  
Stockholm  
Vienna  
Warsaw  
Zurich

**North & South America**  
Bogota  
Brasilia  
Buenos Aires  
Calgary  
Caracas  
Chicago  
Dallas  
Guadalajara  
Houston  
Juarez  
Mexico City  
Miami  
Monterrey  
New York  
Palo Alto  
Porto Alegre  
Rio de Janeiro  
San Diego  
San Francisco  
Santiago  
Sao Paulo  
Tijuana  
Toronto  
Valencia  
Washington, DC

March 2, 2009

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

William K. Coulter  
Tel: +1 202 835 6136  
Fax: +1 202 416 7138  
william.k.coulter@bakernet.com

Via Hand Delivery

RE: France Telecom Long Distance USA, LLC; IB Dkt. 09-10 Response

Dear Ms. Dortch:

France Telecom Long Distance USA, LLC ("FTLD"), by its undersigned counsel, hereby responds to the Letter received from John V. Giusti, Acting Chief, International Bureau, Federal Communications Commission ("FCC"), dated Feb. 18, 2009, in the above-referenced docket ("Letter").

For purposes of clarity, the questions presented by the FCC in its Letter are copied below, and FTLD's responses are provided below in italics.

Question 1: Please confirm whether FTLD provides or provided facilities-based IMTS service between the U.S. and Tonga in the calendar year 2008 and/or within this calendar year 2009.

*Response:* [REDACTED]

Question 2: Please indicate whether FTLD has or had in the calendar year 2008 and/or within this calendar year 2009 direct circuits to Tonga and exchanged IMTS traffic over such circuits with TCC, Digicel or its affiliates, or any other carrier authorized to provide telecommunications service in Tonga. If so, please provide a copy of any operating agreement(s) for 2008 and/or 2009 for the exchange of traffic with Tonga into which you have entered with any of the aforementioned entities, including all rate and discount schedules or amendments.

*Response:* [REDACTED]

Question 3: If FTLD has or had direct circuits to Tonga, please indicate if and when those circuits were disrupted, and the circumstances under which the disruption occurred.

Marlene H. Dortch  
March 2, 2009  
Page 2

*Response:* [REDACTED]

Question 4: Please indicate whether FTL D currently provides or provided during the calendar year 2008 and/or calendar year 2009 IMTS service to or from Tonga through an alternative operating arrangement (e.g., through a third party or country). If so, please identify those carriers and countries, briefly describe those arrangements and specify the settlement rates (including any discounts) for the exchange of traffic with Tonga during 2008 and/or 2009.

*Response:* [REDACTED]

A certification signed by an officer of FTL D is attached hereto.

Kindly direct any questions regarding this filing to the undersigned.

Regards,

*William K. Coulter*

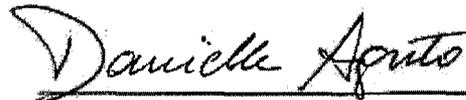
William K. Coulter  
Counsel for France Telecom Long Distance USA, LLC

cc: James Ball, FCC

Attachment

CERTIFICATION OF FRANCE TELECOM LONG DISTANCE USA, LLC

I, Danielle Aguto, hereby certify that I am an officer of France Telecom Long Distance USA, LLC ("FTLD"), and that I have reviewed the Letter from William K. Coulter to the Federal Communications Commission in IB Dkt. 09-10, dated March 2, 2009, and that all of the information contained therein is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Danielle Aguto, Secretary

Dated: March 2, 2009