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March 10, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: *Petition Pursuant to Rule 64.1002(d) Requesting Issuance of Settlements Stop Payment Order on the US-Tonga Route, IB Docket No. 09-10*

*Reporting Requirements for U.S. Providers of International Telecommunications Services, IB Docket No. 04-112*

*Joint Petition for Rulemaking to Further Reform the International Settlements Policy, RM-11322*

*Assessment and Collection of Regulatory Fees for Fiscal Year 2008, MD Docket No. 08-65*

*Implementation of the Telecommunications Act of 1996 – Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, WCB Docket No. 96-115*

Dear Ms. Dortch:

On March 9, 2009, Eric Loeb, James Talbot and I met with John Giusti, James Ball, David Krech and Arthur Lechtman of the Commission's International Bureau to discuss the above-referenced proceedings.

Specifically, we discussed the reply comments filed by AT&T in regard to its request for issuance of a settlements stop payment order on the U.S.-Tonga route. AT&T emphasized the importance of Commission action to prevent harm to the U.S. market from the blocking of U.S. carrier circuits by the Tonga Communications Corporation after the U.S. carriers refused to agree to unreasonable increases in termination rates. AT&T further emphasized that, as stated in *International Settlements Policy Reform*, First Report and Order, 19 FCC Rcd. 5709, ¶ 35, n.92 (2004), "the Commission has made clear that its policies regarding foreign market power abuses

apply” where, as here, foreign carriers “act pursuant to anticompetitive government mandates.” We noted that the Commission has ample authority to require U.S. carriers to pay no more than the US\$ 0.19 benchmark rate to terminate calls to Tonga, including calls routed via third countries. We further noted that such a remedy is appropriate here, in addition to a stop payment order, to reduce the adverse effects on the U.S. market resulting from the circuit disruption and rate increase on this route.

In regard to the international reporting item, we stressed the benefits to U.S. carriers of the streamlining contained therein and expressed our support for early Commission action on this important reform. On ISP reform, we similarly noted the benefits to U.S. carriers of removing the ISP requirements from all remaining routes and our support for the commencement of a rulemaking to accomplish this change. In addition, we discussed the industry “Consensus Proposal” for reform of the international bearer circuit regulatory fee methodology and urged swift Commission adoption of that proposal. We also expressed AT&T’s concerns with potential Commission rules that would restrict the foreign storage of CPNI generated in the U.S. and explained that a foreign storage prohibition, without certain public-policy based exemptions, would impede AT&T’s ability to serve its multinational corporate customers in the manner they demand.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission’s rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez". The signature is written in a cursive style with a large, looping final flourish.

cc: John Giusti  
James Ball  
David Krech  
Arthur Lechtman