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August 7, 2009

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

*Re: Petition of AT&T Inc. for Settlements Stop Payment Order on the  
U.S.-Tonga Route, IB Docket No. 09-10.*

Dear Ms. Dortch:

On August 6, 2009, Eric Loeb, James Talbot and I met with James Ball, Kimberly Cook, David Krech, and George Li and of the Commission's International Bureau and Daniel Harrold of the Office of the General Counsel to discuss the above-referenced proceeding.

Specifically, consistent with prior comments filed by AT&T in this proceeding, we discussed whether the Bureau's order requiring all U.S. carriers to suspend payments for termination services to the Tonga Communications Corporation (TCC) should be extended to include U.S. carrier payments to Digicel Tonga Limited. We also discussed AT&T's request set forth in those comments that the Commission should enforce the benchmark rate on the U.S.-Tonga route, which would address the unreasonably high termination rate required by TCC and the Tongan government, by mandating that U.S. carriers take a unified bargaining position in opposition to this demand. We noted that the Commission is clearly authorized to take this further step to encourage the negotiation of lower termination rates for the benefit of U.S. consumers, for the same reasons that support the Commission's issuance of the stop payment order. We emphasized that benchmark compliant rates can be required for both direct and indirectly routed traffic to Tonga, and we noted that there is no support for TCC's claim that the Commission lacks

authority to apply a benchmark enforcement order to U.S.-Tonga traffic sent via indirect routes.

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

Respectfully submitted,

A handwritten signature in black ink, reading "Amy L. Alvarez". The signature is written in a cursive style with a large, looping "z" at the end.

cc: James Ball, International Bureau  
Kimberly Cook, International Bureau  
David Krech, International Bureau  
George Li, International Bureau  
Daniel Harrold, Office of the General Counsel