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February 26, 2010

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

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

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

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

*A National Broadband Plan for Our Future, GN Docket No. 09-51*

*International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act, GN Docket No. 09-47*

Dear Ms. Dortch:

On February 25, 2010 Eric Loeb, James Talbot and the undersigned met with Mindel De La Torre, James Ball, Kiran Duwadi, Francis Gutierrez, Narda Jones, David Krech, Arthur Lechtman, Kathy O'Brien and Walt Strack of the Commission's International Bureau to discuss the above-referenced proceedings.

Specifically, we emphasized the importance of the actions taken by the Commission to prevent harm to U.S. consumers 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. We also stressed AT&T's support for the enforcement of the \$0.19 benchmark rate on the U.S.-Tonga route, including U.S.-Tonga calls routed via third countries, as a further remedy in the current proceeding. We noted that the Commission has ample authority to take

this action, contrary to the claims by the Tongan carriers, 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In regard to the international reporting item, we stressed the need to address burdensome and outdated international traffic and circuit reporting requirements and expressed our support for early Commission action on proposed streamlining measures. We urged that if there are to be further proceedings to refresh the record, the Commission should take early action on the existing record to remove certain clearly outdated reporting requirements, such as the quarterly traffic reports required by Section 43.61(b).

We also noted the benefits to U.S. consumers from the Commission's 2004 reform of the International Settlements Policy on routes accounting for 98 percent of U.S. international traffic and our support for the commencement of a rulemaking to extend these reforms to all U.S. international routes.

In addition, we also discussed the ongoing work of the U.S. Government with the Organisation for Economic and Co-operative Development (OECD) to revise the methodologies for constructing its telecommunication price baskets. We noted that although the OECD has recently proposed some improvements, flaws remain that must be improved in order to strengthen the validity and usefulness of certain OECD comparisons.

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,  


cc: Mindel De La Torre  
James Ball  
Kiran Duwadi  
Francis Gutierrez  
Narda Jones  
David Krech  
Arthur Lechtman  
Kathy O'Brien  
Walt Strack