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April 21, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

AT&T Inc., on behalf of its affiliates (“AT&T”), hereby submits data concerning the number of hours required to comply with Part 43 international reporting requirements for inclusion in the record of the above-referenced proceeding.

AT&T estimates that the collection and compilation of the annual international traffic report required by Section 43.61(a) requires *more than 350 hours* of work by AT&T personnel. Similarly, AT&T estimates that the collection and compilation of the annual international circuit status report required by Section 43.82 requires *more than 200 hours* to complete. These compliance burdens substantially exceed the estimated response times listed in the *Federal Register* pursuant to the Paperwork Reduction Act, of two hours for the annual international traffic report, and nine hours for the annual international circuit status report.¹ Additionally, the quarterly international traffic report required by Section 43.61(b) requires *approximately 33 hours* of work by AT&T personnel per quarter, which substantially exceeds the estimated response time of two hours for this report.

As AT&T has emphasized in its comments filed in this and other proceedings, the Commission should reduce these compliance burdens by adopting long-pending proposals to streamline the Part 43 international reports by removing out-dated data collection requirements that no longer serve any useful purpose in today’s greatly changed market and regulatory

¹ See *Notice of Public Information Requirements Being Reviewed by the Federal Communications Commission for Extension Under Delegated Authority*, 74 Fed. Reg. 53235, 53236 (2009). See also, AT&T Comments, *Notice of Public Information Requirements Being Reviewed by the Federal Communications Commission for Extension Under Delegated Authority*, filed Dec. 15, 2009, at 3.

environment.² During almost two decades since these reporting requirements were last substantially revised in 1992, rapid technological change, market liberalization, the privatization of most former government-owned incumbent carriers, widespread new market entry, greatly reduced retail and wholesale prices, and huge increases in international traffic volumes have transformed the global telecommunications industry and allowed the Commission to reduce significantly its former regulation of the U.S. international market.³ To date, however, there has been no similar adjustment in the Part 43 international reporting requirements to reflect these changed Commission rules and policies.

For example, Rule 43.61(b) continues to require the filing of quarterly traffic reports in order to allow detection of “one way bypass,” although this safeguard has been both unnecessary and unworkable since 2004, when the Commission removed the International Settlements Policy from virtually all routes and allowed all traffic on those routes to be terminated under commercial arrangements.⁴ Likewise, the Commission’s 2009 reform of international circuit regulatory fees has removed any further need for the collection of submarine cable circuit information pursuant to Section 43.82.⁵ When the original policy rationale for a reporting requirement no longer has relevance for the Commission, the reporting requirement can and should be eliminated.

The Commission stated in the 2004 Notice of Proposed Rulemaking in this proceeding that it sought “to simplify the reporting requirements and to ensure the usefulness of the data collected by the Commission.”⁶ These important streamlining measures clearly are necessary today. As shown above, compliance with the current reporting requirements continues to impose a significant burden on U.S. international carriers, and in turn, on Commission staff who must review the material that serves a greatly diminished objective. AT&T submits that this burden is disproportionately high compared to the benefit of this extensive data collection in today’s changed market and regulatory environment, and therefore hopes that the Commission will quickly take action to adopt the pending streamlining proposals. AT&T also urges the Commission not to adopt proposed new reporting requirements, such as for the reporting of non-

² See, e.g., *id.*; AT&T Comments, 2010 Biennial Review of Regulations Administered by the International Bureau, IB Docket No. 10-268 (filed Jan. 31, 2011); AT&T Comments, 2008 Biennial Review of Regulations Administered by the International Bureau, IB Docket No. 08-179 (filed Oct. 6, 2008).

³ See, e.g., *International Settlements Policy Reform*, 19 FCC Rcd. 5709 (2004) (“*ISP Reform Order*”) (removing the International Settlements Policy from the large majority of U.S. international routes); *Review of Commission Consideration of Applications Under the Cable Landing License Act*, 16 FCC Rcd. 22,167 (2001) (streamlining submarine cable licensing rules); *2000 Biennial Regulatory Review, Policy and Rules Concerning the International Exchange Marketplace*, 16 FCC Rcd. 10,647 (2001) (detariffing non-dominant carriers’ international interexchange services); *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, 12 FCC Rcd. 23,891 (1997) (adopting open market entry rules in compliance with the WTO Basic Telecommunications Agreement); *Streamlining the International 214 Authorization Process and Tariff Requirements*, 11 FCC Rcd. 12,884 (1996) (streamlining Section 214 rules).

⁴ See *ISP Reform Order*, 19 FCC Rcd. 5709.

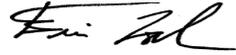
⁵ *Assessment and Collection of Regulatory Fees for Fiscal Year 2008*, Second Report and Order, 24 FCC Rcd. 4208 (2009).

⁶ *Reporting Requirements for U.S. Providers of International Telecommunications Services*, IB Docket No. 04-112, Notice of Proposed Rulemaking, FCC 04-70, rel. Apr. 12, 2004.

route specific revenues, that would increase reporting burdens without serving any clear public interest in today's highly competitive international marketplace.

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, appearing to read "Eric Ball".

cc: Mindel De La Torre, International Bureau
James Ball, International Bureau
David Krech, International Bureau
David Strickland, International Bureau
Mark Uretsky, International Bureau

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