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Ex Parte

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

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

Dear Ms. Dortch:

In an ex parte filed February 8, 2012, AT&T raised concerns regarding certain proposed modifications to international reporting requirements. Verizon shares AT&T's concerns.

The proposed changes would require the reporting of active and idle submarine cable circuit capacity in the cable circuit status report on a cable-specific basis, rather than on a country-specific basis as currently required. Such a change would require significant system modifications in order to identify active circuit information by submarine cable. Therefore, our preference would be to continue to report circuit capacity on a country-specific basis.

Regarding the proposed changes related to cable system capacity information provided in Table 7 of the current cable circuit status report, Verizon supports the view expressed by AT&T that the reporting of this information can be codified recognizing that the forecasted information contained in Table 7 is constantly subject to change and should be viewed as best estimates. Verizon also shares AT&T's concern that all licensees may not have this capacity information on all cables.

One electronic copy of this letter is being submitted in the above-referenced proceeding in accordance with Section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

cc: James Ball

Cathy Hsu

David Krech

Mark Uretsky