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April 20, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On April 19, 2012 I spoke by telephone with Mark Uretsky of the International Bureau concerning potential changes in the circuit status reporting requirements for submarine cable systems under consideration in the above-referenced proceeding.

I informed Mr. Uretsky that AT&T would support the reporting of submarine cable circuit capacity on a cable-specific basis under a streamlined approach under which reporting parties would report their ownership, net leasehold and net IRU capacity held on each U.S.-licensed cable system and further identify the amounts of such capacity that are activated ("lit") and non-activated ("unlit"). This streamlined reporting approach would replace the current requirement for the reporting of submarine cable circuit capacity on a country-specific basis and would significantly reduce current reporting burdens.

I further noted that AT&T understands that the capacity identified as "activated" under this approach would include both "active" and "idle" circuits under current definitions. As stated in the letter dated February 8, 2012 from Amy Alvarez of AT&T filed in the above-referenced proceeding, AT&T's information systems identify "active" circuits by country rather than by cable and it would be more burdensome for AT&T to report those circuits by cable than by country as presently required. The reporting of capacity by cable as either activated (including both active and idle capacity) or non-activated would avoid these potential difficulties.

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,

/s/ James Talbot
James Talbot

CC: David Krech, International Bureau
Mark Uretsky, International Bureau