



James J.R. Talbot
General Attorney

1120 20th Street NW
Suite 1000
Washington, DC 20036
202-457-3048 (phone)
202-457-3073 (fax)
jjtalbot@att.com (email)

August 10, 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:

At the request of the International Bureau staff, AT&T is providing a description of activated and non-activated submarine cable system capacity for consideration in the above-referenced proceeding.

AT&T considers activated (or “lit”) submarine cable system capacity to mean capacity that has been specifically assigned for use by the capacity owner (or IRU holder, as relevant) by either the network administrator in the case of a consortium cable system, or by the private operator in the case of a non-consortium cable system. The assignment of non-activated capacity by the network administrator of a consortium cable system is at the request of the capacity owner. For non-consortium cables, such assignment is determined by the contractual arrangements between private operator and IRU holder or lessee. Except for activated capacity used for restoration, activated capacity is also connected to the domestic U.S. network (*e.g.*, via backhaul circuits). Activated capacity is optically and/or electrically powered and fully equipped with the necessary equipment, such as transponders and plug-ins and/or ports, to carry traffic.

Non-activated (or “unlit”) capacity is capacity ownership or entitlement capacity that has not yet been specifically assigned for use by the capacity owner. In some cable systems, only a portion of the non-activated capacity is equipped to carry traffic and optically and/or electrically powered, as determined by the management committee of the consortium cable or the private operator. In other cable systems, all non-activated capacity (*i.e.*, up to the design capacity of the cable system) is equipped and powered. On consortium cables where only a portion of the non-activated capacity is equipped and powered, sufficient capacity is normally equipped and powered to meet potential capacity assignment requests for several years ahead.

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