



James J.R. Talbot  
General Attorney

1120 20<sup>th</sup> Street NW  
Suite 1000  
Washington, DC 20036  
202-457-3048 (phone)  
202-457-3073 (fax)  
[jjtalbot@att.com](mailto:jjtalbot@att.com) (email)

October 11, 2012

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

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

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Dear Ms. Dortch:

On Wednesday, October 10, 2012, the undersigned, representing AT&T, spoke by telephone with Francis Gutierrez of the International Bureau concerning the proposal in the above-referenced proceeding to limit the confidential treatment of U.S. carrier international data, including traffic revenue and cost data, filed pursuant to the international reporting requirements.

In this conversation, I described AT&T's concerns that limiting the availability or duration of confidential treatment for this data would harm U.S. carriers by enabling foreign carriers to use this data to identify and take action against U.S. carriers' least cost routing practices, and by giving competitors insight into U.S. carriers' costs, prices and market strategies. Rather than adopt this proposal, the Commission should facilitate the process of requesting confidential treatment for this data by allowing filers to make this request by checking a box on the filing form, similar to the filing procedures for domestic Form 477 and Form 499 data. I also noted AT&T's view that, consistent with these concerns, the Commission should change the existing practice of including carrier-specific revenue and cost data in the international traffic report. The publication of this carrier-specific data serves no apparent policy purpose in today's largely deregulated U.S. international market, and is not consistent with the Commission's domestic reporting practice of not publishing carrier-specific cost and revenue information filed by non-dominant carriers. The international report similarly should contain only aggregated industry data.

One electronic copy of this Notice is being submitted in the above-referenced proceeding in accordance with Section 1.206 of the Commission's rules.

Respectfully submitted,

/s/ James Talbot  
James Talbot

cc: Francis Gutierrez