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October 11, 2012

Ms. 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 Wednesday, October 10, 2012, the undersigned, representing AT&T, spoke by telephone concerning the above-referenced proceeding with Louis Peraertz, Legal Adviser, Wireless, International and Public Safety, for Commissioner Mignon Clyburn. I also had separate telephone conversations on this subject with David Goldman, Senior Legal Adviser for Commissioner Jessica Rosenworcel, and Priscilla Argeris, Legal Adviser for Commissioner Rosenworcel, and with Nicholas Degani, Legal Adviser, Wireline, for Commissioner Ajit Pai.

In each call, I expressed AT&T's support for the proposed further streamlining of the international reporting requirements in the above-referenced proceeding, which would modernize the reports and eliminate unnecessary reporting burdens, and for the proposed expansion of the reporting requirements to include providers of interconnected VoIP services and non-common carrier international facilities. The latter change would allow the reports to better serve their intended purposes by providing more complete coverage of the U.S. international market.

I also noted AT&T's concerns regarding two aspects of the proposals put forward in this proceeding. First, regarding the proposal to limit the confidential treatment of U.S. carrier international data, including traffic revenue and cost data, 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.

Second, the proposed elimination of the requirement to file a single revised report, and the proposed requirement to file revised international traffic revenue and cost data on a monthly basis, would require U.S. carriers to undergo the highly burdensome process of making multiple filings to correct their filed data. The Commission therefore should retain the existing requirement for the filing of a revised international report three months after the initial report.

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: Priscilla Argeris
Nicholas Degani
David Goldman
Louis Peraertz