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November 21, 2012

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

*Re: Petition for Protection from Anticompetitive Behavior and Stop Settlement
Payment Order on the U.S.-Pakistan Route, IB Docket No. 12-324 &
International Settlements Policy Reform, IB Docket No. 11-80*

Dear Ms. Dortch:

On November 20, 2012, Eric Loeb (by telephone) and the undersigned, representing AT&T, met with James Ball, Kimberly Cook (by telephone), and David Krech of the International Bureau, concerning the above-referenced proceedings.

At the meeting, AT&T expressed its support for Commission intervention on the U.S.-Pakistan route to address the concerted actions by certain carriers in Pakistan to increase international termination rates by more than 400 percent. AT&T noted that these actions constitute anticompetitive conduct undertaken “to force U.S. carriers to accept above-cost settlement rate increases that would be passed on to U.S. consumers,” and require the Commission to take action under its safeguards policies to prevent that result.¹ AT&T also emphasized that rather than the full stop payment order requested in the petition filed by Vonage Holding Corp., which would require U.S. carriers to stop all settlements payments pending the cessation of the challenged conduct, the appropriate remedy in the instant circumstances, where there has been no disruption of U.S. carrier circuits, is an order prohibiting the payment of the rate increase. Such an order would fully protect U.S. consumers against the anticompetitive rate increase while also encouraging the continuation of service on the route. AT&T noted that it would file reply comments on November 20, 2012 encouraging the adoption of this approach.

AT&T also expressed its support for proposals in the pending International Settlements Policy (“ISP”) Reform rulemaking to remove the ISP on all routes other than Cuba, and to provide additional protections against anticompetitive conduct by foreign carriers, while noting that it does not support proposed new filing or notification requirements. As AT&T has described in its comments in this proceeding, remaining high rates should be addressed through the continuation of the Commission’s longstanding and highly successful market-based enforcement policy.

¹ See *International Settlements Policy Reform*, First Report and Order, 19 FCC Rcd. 5709, ¶ 44 (2004).

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: James Ball
Kimberly Cook
David Krech