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December 19, 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*

Dear Ms. Dortch:

As requested by the International Bureau, AT&T is providing the following information concerning the status of the increased settlement rates on the U.S.-Pakistan route that are the subject of the above-referenced proceeding. Following press reports that the Pakistani Telecommunications Authority (“PTA”) has withdrawn the increased rate Order, AT&T asked its correspondent long distance international carrier in Pakistan to clarify the current status of the settlement rate. The carrier responded on December 17, 2012 that the increased rate of \$0.088 per minute remains in effect. As mentioned in our prior comments in this proceeding, this rate increase does not appear to have a cost-justification, appears to be the result of concerted action among the majority of Pakistan’s international carriers, and is harming the interests of consumers, including enterprises that do business in and with Pakistan and end users such as individuals who have family and friends living in Pakistan.

AT&T continues to support Commission intervention to address this unjustified unilateral increase, which was not commercially negotiated and has been premised on the PTA Order. Specifically, the Commission should prohibit the payment of any unilaterally imposed rates higher than those in effect prior to the October 1, 2012 rate increase by adopting an order in this proceeding stating as follows:

1. All facilities-based carriers subject to FCC jurisdiction having a correspondent agreement for direct termination of U.S. switched voice traffic on the U.S.-Pakistan route with any or all of the following carriers (hereinafter referred to as “the Pakistan Long Distance Carriers”):
 - a. the Pakistan Telecommunications Company Limited;
 - b. Multinet Pakistan (Private) Limited;
 - c. 4B General International (Private) Limited;
 - d. Wi-tribe Pakistan Limited;
 - e. Dancom Pakistan (Private) Limited;
 - f. Wise Communication System (Private) Limited;
 - g. Worldcall Telecom Limited;
 - h. ADG (Private) Limited;
 - i. Link Direct International (Private) Limited;

- j. Telecard Limited;
- k. Circle Net Communications Pakistan (Private) Limited;
- l. Wateen Telecom Limited;
- m. Redtone Telecommunications Pakistan (Private) Limited; and/or
- n. Telenor LDI Communications (Private) Limited

shall immediately inform the Commission of any settlement or termination rate increase imposed effective on or around October 1, 2012 by any or all of the Pakistan Long Distance Carriers for direct termination of U.S. switched voice traffic on the U.S.-Pakistan route effective upon release of this Order.

2. All facilities-based carriers subject to FCC jurisdiction having a correspondent agreement for direct termination of U.S. traffic on the U.S.-Pakistan route with any or all of the Pakistan Long Distance Carriers shall not pay the increment above the negotiated settlement or termination rate by which such prior rate was increased effective on or around October 1, 2012 by any or all such Pakistan Long Distance Carriers for direct termination of U.S. switched voice traffic on the U.S.-Pakistan route (“October 1, 2012 Termination Rate Increment”) effective upon release of this Order until such time as the Commission issues a Public Notice stating that all facilities-based carriers subject to FCC jurisdiction are no longer subject to any unilaterally imposed requirement to pay the October 1, 2012 Termination Rate Increment. All facilities-based carriers subject to FCC jurisdiction may continue to pay any settlement or termination rate in effect prior to the October 1, 2012 Termination Rate Increment.
3. All facilities-based carriers subject to FCC jurisdiction having a correspondent agreement for direct termination of U.S. traffic on the U.S.-Pakistan route with any or all of the Pakistan Long Distance Carriers shall notify the Commission immediately they are informed by any or all of the Pakistan Long Distance Carriers that they are no longer required to pay any settlement or termination rate increase imposed effective on or around October 1, 2012 for direct termination of U.S. switched voice traffic on the U.S.-Pakistan route.

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