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

Ex parte

Re: Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act, as Amended, IB Docket No. 11-133; Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market, IB Docket No. 12-299.

Dear Ms. Dortch:

On February 20, 2013, Amy Alvarez and the undersigned of AT&T met with James Ball, Kate Collins, Francis Gutierrez, Susan O'Connell and Troy Tanner of the International Bureau and Kate Dumouchel of the Office of General Counsel and discussed the above-referenced proceedings. During the discussion, AT&T expressed support for the continuation of the different treatment of WTO and non-WTO Member country investment in common carrier radio licensees under Section 310(b)(4) and for the streamlining measures proposed by the Commission to reduce unnecessary regulatory burdens. AT&T also expressed support for the continuation of the ECO test for international Section 214 applicants from non-WTO Member countries and for the proposed modifications to provide a more flexible ECO test. AT&T emphasized that the retention of these market entry policies remains particularly necessary for international Section 214 applicants from non-WTO Member countries to encourage these countries to open their markets and join the WTO, and that this objective is even more important today in light of the importance of competition and telecom market liberalization in stimulating investment and use of the networks that are the backbone of electronic commerce and the information-based economy of the 21st century.

Respectfully submitted,

/s/James J. R. Talbot

CC: James Ball
Kathleen Collins
Kate Dumouchel
Francis Gutierrez
Susan O'Connell
Troy Tanner