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Sent: Tuesday, December 15, 2009 2:07 PM
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Subject: AT&T's comments on Notice of Public Information Collections

Attachments: ATT Comments on Notice of Public Information Collections 121509.pdf



ATT Comments on
Notice of Publ...

Good afternoon,

Attached are AT&T's comments in response to the Notice of Public Information Collections Being Reviewed by the Federal Communications Commission For Extension under Delegated Authority, 74 Fed. Reg. 53235 (2009). AT&T's comments concern the information collections subject to OMB Control Numbers 3060-0106 & 3060-0572.

Please contact James Talbot on (202) 457-3048 with any questions.

Thank you.

<<ATT Comments on Notice of Public Information Collections 121509.pdf>>

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Notice of Public Information)
Collections Being Reviewed by the)
Federal Communications Commission)
For Extension under Delegated Authority)

COMMENTS OF AT&T INC.

AT&T Inc., on behalf of its affiliates, (“AT&T”) submits the following comments in response to the recent request for comments on certain proposed information collections pursuant to the Paperwork Reduction Act of 1995.¹ AT&T’s comments address the information collections subject to OMB Control Number 3060-0106 (Reporting Requirements for U.S. Providers of International Telecommunications Services and Affiliates) and OMB Control Number 3060-0572 (Filing Manual for Annual International Circuit Status Reports).

The Commission requests comments “concerning (a) whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; (b) the accuracy of the Commission’s burden estimate; (c) ways to enhance the quality, utility, and clarity of the information collected; and (d) ways to minimize the burden of the collection of information on the respondents, including the use of automated collections techniques or other forms of information technology.”² As a result of the significant changes in the U.S. and global

¹ 74 Fed. Reg. 53235 (2009) (“Notice”).

² *Id.*

international communications markets since the Commission's international traffic and circuit reporting requirements were last revised, these information reporting requirements are no longer necessary in their present form for the proper performance of Commission functions, yet continue to impose significant burdens on U.S. carriers. The Commission, accordingly, should adopt the long-pending rulemaking proposals to streamline this information reporting by removing many out-dated requirements that no longer serve any useful purpose in today's competitive marketplace.

The global telecommunications services industry now bears little resemblance to the global industry that existed in the early 1990's, when the Sections 43.61 and 43.82 international reporting requirements last underwent substantial revision. There have been major pro-competitive developments since that time, with rapid technological change, global market liberalization as the result of the WTO Basic Telecommunications Agreement, the privatization of many former government owned incumbent carriers, widespread new entry, huge reductions in termination rates and retail and wholesale prices, and massive increases in international traffic volumes. These greatly changed market circumstances require the Commission further to align its international rules with the highly competitive U.S. international marketplace by streamlining the international reporting requirements. The extensive international traffic and circuit reports that U.S. carriers continue to file today are largely a remnant of that former monopoly era and impose substantial burdens that could be significantly reduced by such reform.

AT&T's experience also indicates that the burdens on carriers from these reports significantly exceed the time estimates set forth in the Notice. With regard to OMB Control Number 3060-0106 (Reporting Requirements for U.S. Providers of International Telecommunications Services and Affiliates), the Notice lists the estimated time per response as

“2 hours.”³ However, AT&T estimates that the annual international traffic report required by Section 43.61(a) requires over 350 hours to complete. Similarly, with regard to OMB Control Number 3060-0572 (Filing Manual for Annual International Circuit Status Reports), the Notice lists the estimated time per response as “9 hours,” but AT&T estimates that compilation of the annual report requires over 200 hours.⁴

The Commission should proceed with proposed reforms of the international reporting procedures to reduce these burdens on U.S. carriers. The Commission initiated a rulemaking in 2004 to streamline the international reporting requirements to reflect more closely the largely deregulated, dynamic and intensely competitive U.S. and global markets in which U.S. carriers compete today, and proposed various steps to reduce and simplify the data reported in annual reports in addition to the elimination of Section 43.61 quarterly traffic reports.⁵ AT&T and other U.S. carriers have supported these proposals but have also expressed concern that the Commission should not adopt proposed new reporting requirements, such as for the reporting of non-route specific revenues, that would increase reporting burdens without serving any clear public interest purpose in today’s highly competitive international marketplace in which market forces have reduced both costs and prices far below former levels.

AT&T therefore hopes that the Commission will quickly take action to reduce the burdens on U.S. carriers by adopting the pending streamlining proposals to remove out-dated

³ 74 Fed. Reg. at 53235.

⁴ *Id.* at 53236.

⁵ *Reporting Requirements for U.S. Providers of International Telecommunications Services*, 19 FCC Rcd. 6460 (2004). For example, the Section 43.61 quarterly traffic report was established in 1997 to allow detection of “one-way by-pass” resulting from the use of ISR arrangements, which has been unnecessary since the Commission eliminated the ISR policy in 2004. *See International Settlement Rates*, 12 FCC Rcd. 19806, ¶¶ 249-253 (1997) (establishing reporting requirement); *International Settlements*

international reporting requirements while avoiding the addition of proposed new international reporting obligations.

Respectfully submitted,

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Policy Reform, 19 FCC Rcd. 5709, ¶ 31 (2004) (eliminating the ISR policy).