## **DRAFT FILING MANUAL FOR SECTION 43.62 ANNUAL REPORTS**

## December 2014

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#### I. INTRODUCTION AND SUMMARY

- 1. Section 43.62 of the Commission's rules, 47 C.F.R. § 43.62, sets forth annual traffic and revenue reporting requirements that apply to any person or entity that (1) holds an authorization from the Commission under section 214 of the Communications Act of 1934 (Communications Act), as amended, 47 U.S.C. § 214, to provide International Telecommunications Service; or (2) is engaged in providing Voice over Internet Protocol (VoIP) service connected to the public switched telephone network (PSTN) between the United States and any foreign point. Section 43.62 also sets forth annual circuit capacity reporting requirements that apply to (1) any facilities-based common carrier with active satellite or terrestrial circuits between the United States and a foreign point; (2) any non-common carrier satellite licensee with active circuits between the United States and a foreign point; or (4) any common carrier with capacity on a submarine cable between the United States and a foreign point. The Commission compiles the data filed pursuant to section 43.62 of the Commission's rules in FCC statistical reports that it publishes annually.
- 2. Based on the requirements of section 43.62 of the Commission's rules, this Filing Manual provides the directions for completing the Traffic and Revenue Report and the Circuit Capacity Report.<sup>3</sup> It sets forth instructions on how to file the section 43.62 reports and Registration Form. It explains who must file, which of the reports to file, the information that each report must contain, and the filing procedures. The Filing Manual is organized as follows: Section I provides a brief introduction and summary of the Filing Manual. Section II describes who must file the annual reports, how they must file, and related matters applying to all Filing Entities. Section III sets forth filing instructions for the Traffic and Revenue Report. Section IV sets forth filing instructions for the Circuit Capacity Report. Also included are the following appendices: (A) the text of section 43.62 of the Commission's rules; (B) definitions of terms used in this Filing Manual; (C) the Registration Form; (D) the Traffic and Revenue Report (the Services Checklist and Schedules 1-4); and (E) the Circuit Capacity Report.
- 3. Appendix B of this Filing Manual defines terms used in the manual. These include the following descriptions of various persons and entities subject to section 43.62 filing requirements. A U.S. International Authorization Holder is a person or entity that has received authorization from the FCC under section 214 of the Communications Act, 47 U.S.C. § 214, to provide International Telecommunications Service. A U.S. International Carrier is a person or entity in the United States that provides International Telecommunications Service (*i.e.*, telecommunications on a common carrier basis between the United States and a foreign point) or holds a U.S. section 214 authorization to do so. A U.S. International Service Provider is a U.S. International Carrier or a person or entity in the United States that provides VoIP service connected to the PSTN between the United States and any foreign point (International VoIP Service Connected to the PSTN). Included within the definition of a U.S. International Call Completion Service<sup>4</sup> to or from a foreign point for International Message Telephone Service (IMTS) or

<sup>&</sup>lt;sup>1</sup> See Reporting Requirements for U.S. Providers of International Telecommunications Services, Amendment of Part 43 of the Commission's Rules, IB Docket No. 04-112, Second Report and Order, FCC 13-6, 28 FCC Rcd 575 (2013) (Second Report and Order).

<sup>&</sup>lt;sup>2</sup> *Id*.

<sup>&</sup>lt;sup>3</sup> 47 C.F.R. § 43.62(d).

<sup>&</sup>lt;sup>4</sup> See Appendix B for a definition of International Call Completion Service. This Filing Manual uses the term "call completion" instead of "call termination" because call completion is a more accurate term for the

International VoIP Service Connected to the PSTN.<sup>5</sup> A Filing Entity is a person or entity that is required to file information with the FCC pursuant to section 43.62 of the Commission's rules, 47 C.F.R. § 43.62, as described in this Filing Manual. Please consult Appendix B for a complete set of definitions of terms used in this Filing Manual.

4. The sections of the Filing Manual that deal with reporting of common carrier services such as private line services and miscellaneous services, or that deal with ownership of circuit capacity by common carriers, refer to reporting entities as "U.S. International Carriers." The sections of the Filing Manual that deal with reporting of International Calling Service (defined below) – which include common carrier services as well as services that have not been classified as common carriage by the FCC – refer to reporting entities as "U.S. International Service Providers."

## II. FILING REQUIREMENTS

5. This section contains general requirements applicable to all Filing Entities.

## A. Who Must File Section 43.62 Reports?

6. This section of the Filing Manual describes in detail who must file each of the section 43.62 reports.

### 1. Who Must File a Traffic and Revenue Report?

- 7. Any U.S. International Authorization Holder, whether or not it provided any International Telecommunications Service during the preceding calendar year (the reporting period), must file a Traffic and Revenue Report. Any U.S. International Service Provider that provided service during the reporting period must file a Traffic and Revenue Report, whether such provider operated by using its own facilities or by reselling the facilities or services of another provider.
- 8. The Traffic and Revenue Report consists of a Services Checklist and four schedules (Schedules 1-4) that each U.S. International Service Provider must use to report data regarding the minutes, revenues, settlement receipts, settlement payouts, and circuits for international services that it provided or obtained during the reporting period. U.S. International Service Providers must use Schedules 1 and 2 to report information for International Calling Service. International Calling Service (ICS) is defined as International Message Telephone Service (IMTS) and International VoIP Service Connected to the PSTN, including International Call Completion Service for IMTS or International VoIP Service Connected to the PSTN. U.S. International Carriers must use Schedule 3 to report information for International Private Line Service and Schedule 4 to report information for International Miscellaneous Services. A U.S. International Authorization Holder that provided no International Telecommunications Services or International VoIP Service Connected to the PSTN during the reporting period need only file the Services Checklist.

services that service providers buy and sell to complete calls. Service providers may buy or sell call completion services that do not entail physical termination of a call. For example, for an international 800 call from Country A to Country B, the service provider in Country B pays the service provider in Country A for originating, rather than terminating, the call.

<sup>&</sup>lt;sup>5</sup> See Appendix B for definitions of International Message Telephone Service and International VoIP Service Connected to the PSTN.

<sup>&</sup>lt;sup>6</sup> 47 C.F.R. § 43.62(b)(1).

<sup>&</sup>lt;sup>7</sup> 47 C.F.R. § 43.62(b)(2)

- 9. A U.S. International Service Provider that billed less than \$5 million in ICS Resale revenue and did not bill any Facilities ICS revenue for the reporting period is not required to report data for ICS Resale on its Traffic and Revenue Report. If, in addition, such a provider did not bill any International Private Line Service revenue and did not bill \$5 million or more in revenue for any International Miscellaneous Service provided during the reporting period, then the provider satisfies the requirements of section 43.62(b) by filing only the Services Checklist. However, if a U.S. International Service Provider billed less than \$5 million in ICS Resale revenue for the reporting period and also billed Facilities ICS revenue for the reporting period, then the provider is required to report data for ICS Resale as well as Facilities ICS.
- 10. A U.S. International Carrier that billed less than \$5 million in revenue for an International Miscellaneous Service provided during the reporting period need not file data for that service on its Traffic and Revenue Report. Each such carrier must, however, file data for any International Miscellaneous Service offering for which it billed \$5 million or more in revenue for the reporting period.

## 2. Who Must File a Circuit Capacity Report?

- 11. Any U.S. International Carrier that owned or leased bare capacity on a submarine cable between the United States and any foreign point on December 31 of the reporting period and any person or entity that held a submarine cable landing license on December 31 of the reporting period must file a Circuit Capacity Report to provide information about the submarine cable capacity it holds. Additionally, cable landing licensees must file information on the Circuit Capacity Report about the amount of available and planned capacity on the submarine cable for which they have a license. For submarine cables with more than one licensee, only one licensee shall file available and planned capacity data for each submarine cable. The licensees shall determine which licensee will file the capacity data for that submarine cable.
- 12. Any U.S. International Carrier that owned or leased bare capacity on a terrestrial or satellite facility as of December 31 of the reporting period shall file a Circuit Capacity Report showing its active common carrier circuits for the provision of service to an end-user or resale carrier, including active circuits used by itself or its affiliates. Any satellite licensee that is not a U.S. International Carrier and that owns circuits between the United States and any foreign point as of December 31 of the reporting period shall file a Circuit Capacity Report showing its active circuits sold or leased to any customer, including itself or its affiliates, other than a carrier authorized by the Commission to provide U.S. international common carrier services. 11

#### **B.** Filing Requirements for Merged Entities

13. Where two or more Filing Entities have merged into a single legal entity during the annual reporting period, the successor (*i.e.*, merged) company shall file a single aggregated section 43.62 report that covers the combined operations of the merged companies during the reporting period, including operations prior to the date of the merger. If the merger occurs after the reporting period, but prior to the filing date, the successor company shall file separate section 43.62 reports for each of the Filing Entities.

<sup>&</sup>lt;sup>8</sup> 47 C.F.R. § 43.62(a)(2)(ii).

<sup>&</sup>lt;sup>9</sup> 47 C.F.R. § 43.62(a)(2)(i).

<sup>&</sup>lt;sup>10</sup> 47 C.F.R. § 43.62(a)(1).

 $<sup>^{11}</sup>$  Id

## C. Affiliated Corporations File by Legal Entity

- 14. Affiliated companies must file separate section 43.62 reports to the extent that they are considered to be separate legal entities (*i.e.*, they have separate articles of incorporation, articles of formation, or similar legal documents). This requirement parallels the filing requirement under the FCC Form 499-A.<sup>12</sup> However, where the Commission has authorized them to make a consolidated FCC Form 499-A filing, the affiliated companies similarly shall make a consolidated section 43.62 filing.<sup>13</sup>
- 15. The Commission's rules require all U.S. Carriers and Interconnected VoIP Service providers to have a Filer 499 ID. <sup>14</sup> They must include that ID with all their filings under section 43.62 of the Commission's rules. The legal entity or entities responsible for filing data under section 43.62 of the Commission's rules are the same legal entity or entities identified by the Filer 499 ID. There may be some persons or entities subject to section 43.62 of the Commission's rules that have not provided any service as a U.S. telecommunications carrier and, therefore, have never obtained a Filer 499 ID. Such a person or entity shall file its section 43.62 reports at the legal entity level. Such a person or entity need not obtain a Filer 499 ID for the purpose of filing its section 43.62 reports. If such a person or entity subsequently begins to provide service as a U.S. telecommunications carrier, it must obtain a Filer 499 ID for the purpose of filing under section 43.62 of the Commission's rules.
- 16. The Filer 499 ID is assigned by the Commission's Data Collection Agent after a company files its first FCC Form 499-A. Filer 499 IDs for current Filing Entities can be found at <a href="http://gullfoss2.fcc.gov/cib/form499/499a.cfm">http://gullfoss2.fcc.gov/cib/form499/499a.cfm</a>.

## D. Filing Dates

- 17. Section 43.62 of the Commission's rules requires Filing Entities to submit the Circuit Capacity Report for the preceding calendar year (the reporting period) on or before March 31 of each year. The the Traffic and Revenue Report for the preceding calendar year on or before July 31 of each year. The earliest dates that the Commission will accept filings will be specified annually by the Bureau Chief, International Bureau, in a Public Notice. Failure to file the Circuit Capacity Report or the Traffic and Revenue Report on time is a violation of the Commission's rules and could result in the imposition of forfeitures or other penalties.
- 18. Any Filing Entity that cannot file its information by the required deadlines must request an extension of time to file by submitting a waiver request under provisions of section 1.3 of the Commission's rules, 47 C.F.R. § 1.3. Make a request for an extension of time to the Chief, International Bureau. In the request, identify the report to be delayed, explain the reasons for the delay, and propose an alternate filing date.

<sup>&</sup>lt;sup>12</sup> The filing requirement is explained in Section II.A of the Instructions accompanying Form 499-A. *See* Federal Communications Commission, Telecommunications Reporting Worksheet (FCC Form 499-A), pp. 4-8. Form 499-A and its Instructions are available at <a href="http://www.fcc.gov/Forms/Form499-A/499a-2010.pdf">http://www.fcc.gov/Forms/Form499-A/499a-2010.pdf</a>.

<sup>&</sup>lt;sup>13</sup> *Id.*, pp. 8-9.

<sup>&</sup>lt;sup>14</sup> Filer 499 ID refers to an identification number assigned by the FCC to entities that file an annual FCC Form 499-A. Sections 52.17 (b), (c), and 54.708 of the Commission's rules, 47 C.F.R. § 52.17 (b), (c), § 54.708, require all telecommunications carriers in the United States, including interconnected VoIP providers, to file a Form 499-A. When a carrier files its first Form 499-A, the Commission's Data Collection Agent assigns the carrier a Filer 499 ID. *See* Form 499-A Instructions, p. 13.

<sup>&</sup>lt;sup>15</sup> 47 C.F.R. § 43.62(a).

<sup>&</sup>lt;sup>16</sup> 47 C.F.R. § 43.62(b).

#### E. Reporting Period

19. The reporting period for each annual section 43.62 filing is the calendar year prior to the year in which the annual filing is to be made. International traffic and revenue data in Schedules 1-4 of the Traffic and Revenue Report shall comprise the entire calendar year, except for private line circuits in Schedule 3, which shall be counted on December 31 of the reporting period. International circuit-capacity data in the Circuit Capacity Report shall be counted on December 31 of the reporting period.

#### F. Rounding of Numbers and Negative Numbers

- 20. *Rounding*. In general, round dollar amounts, minute counts, and circuit counts to whole numbers. For example, Filing Entities should report \$2,271,881.50 as \$2,271,882. The only exceptions are that Filing Entities should report cable capacity on the Circuit Capacity Report International Submarine Cable Capacity Cable Operators in Gbps rounded to one decimal place and capacity holdings on the Circuit Capacity Report International Submarine Cable Capacity Capacity Holders in STM-1 units rounded to one decimal place. <sup>17</sup>
- 21. *Negative Numbers*. File customer revenue without subtracting any expenses, allowances for uncollectible accounts or settlement payouts, and without making out-of-period adjustments. Do not report any negative numbers for customer revenue or other filed data.

## G. Accrual Basis of Accounting

22. Report revenues, expenses, and related amounts (including settlement payouts and settlement receipts) on an accrual basis of accounting rather than a cash basis, except as otherwise provided in the Filing Manual. The amounts reported shall correspond to the value of services provided or obtained during the reporting period, not to the amounts received or paid during the reporting period. For instance, report as settlement payouts the expenses incurred for ICS call completion services to foreign points obtained during the reporting period, not the amounts billed or paid during the reporting period. In cases where a Filing Entity has provided or received services, and the rate for the services has been retroactively adjusted, Filing Entities shall base the revenues or expenses that they report on the adjusted rate, provided that the adjustment occurs prior to the date on which revisions to a Traffic and Revenue Report filing are due (October 31 of the year in which the filing is due to the Commission). Follow the procedures described in paragraphs 24-26 for making revisions to data.

#### H. Estimation

23. To the maximum extent possible, provide actual counts of minutes, circuits, customer revenue, settlement receipts, settlement payouts, and other statistics. Where that is not possible, use statistical sampling methods that are designed to produce a margin of error of no more than one percent with a confidence interval of 95 percent. Where it is not possible to use statistical sampling methods, use other estimation methods that would in good faith be expected to produce accuracy comparable to that specified for statistical methods. Filing Entities shall retain for a period of three years complete documentation, including sampled data, for any statistical or other estimation studies on which they have relied and provide a copy of such documentation to the Commission upon request.

#### I. Revisions

24. Data on file as of the deadlines identified above for filing Circuit Capacity Reports

<sup>&</sup>lt;sup>17</sup> See paragraph 138 for a description of STM-1 units.

<sup>&</sup>lt;sup>18</sup> Second Report and Order, 28 FCC Rcd at 583, ¶¶ 25-26.

and Traffic and Revenue Reports must be the most accurate data available as of the deadline. If a Filing Entity files data in advance of a deadline and discovers inaccuracies in data prior to the deadline, it must file a corrected report, accompanied by a new Registration Form, on or before the deadline. No waiver is required to file a corrected report.

- 25. If a Filing Entity or FCC staff discovers an inaccuracy in a filed statistic in the Traffic and Revenue Report after the July 31 filing deadline, the Filing Entity shall file a corrected Traffic and Revenue Report and Registration Form by October 31 of that same year if the inaccuracy is equal to or greater than one percent of the value of the statistic on file. Except in instances in which a corrected filing is requested by FCC staff, Filing Entities need not file with the Commission corrections identified after October 31, although it is permissible to do so. The Circuit Capacity Report is regarded as final as of the March 31 filing deadline. Filing Entities need not file corrections identified after March 31, although it is permissible to do so.
- 26. Out-of-Period Adjustments. Do not make out-of-period adjustments to the data that are filed under section 43.62 of the Commission's rules. For section 43.62 reporting purposes, the term "out-of-period adjustment" is an adjustment of the data for one reporting period to reflect corrections to data that a Filing Entity had previously filed for a prior reporting period (e.g., an adjustment to the data that a Filing Entity files for 2006 to correct over- or underreporting for the year 2005).

## J. Record Keeping

27. Filing Entities shall maintain records and documentation in support of information reported in section 43.62 reports for three years and shall provide such records and documentation to the Commission upon request. Filing Entities that acquire operations subject to section 43.62 reporting requirements through acquisition of property, consolidation, merger, etc., must maintain the records of the acquired operation for three years following the acquisition. As discussed above, Filing Entities that use estimation techniques, including statistical sampling, must keep these studies for at least three years following the reporting period and provide them to the Commission upon request. The Commission's staff or designees may review or audit any corporate records, including records that the Filing Entity has retained for more than three years, for any reason.

## K. Compliance

28. Failure to file timely section 43.62 reports may subject Filing Entities to the enforcement provisions of the Communications Act and any other applicable law and could result in the imposition of forfeitures or other penalties. Inaccurate or untruthful information contained in section 43.62 reports may lead to prosecution under section 220(e) of the Communications Act<sup>20</sup> or the criminal provisions of Title 18 of the United States Code.<sup>21</sup>

#### L. Filing Format

29. File the section 43.62 reports in electronic format, using electronic spreadsheets ("worksheets") designated by the FCC.

#### M. The Registration Form

30. Accompany each new or revised section 43.62 report with a Registration Form. <sup>22</sup>

<sup>&</sup>lt;sup>19</sup> 47 C.F.R. § 43.62(b)(3).

<sup>&</sup>lt;sup>20</sup> 47 U.S.C. § 220(e).

<sup>&</sup>lt;sup>21</sup> 18 U.S.C. § 1001.

<sup>&</sup>lt;sup>22</sup> 47 C.F.R. § 43.62(c)(1).

The Registration Form elicits basic information about the filing and the Filing Entity; requires Filing Entities to certify the accuracy and completeness of the filed data; and provides the means by which Filing Entities may request confidential treatment of their data.

## 1. Basic Information about the Filing and Filing Entity

31. Filing Entities should provide the following basic information on the Registration Form: the date of the filing; the reporting period covered by the filing; the name and address of the Filing Entity; the FCC Registration Number (FRN) of the Filing Entity; <sup>23</sup> the Filing Entity's Filer 499 ID, if any; <sup>24</sup> the contact information for the preparer of the filing; identification of the filed report (whether the report is the Traffic and Revenue Report or the Circuit Capacity Report); whether the filing is a new report or a revision to an existing report; information about the Filing Entity's section 214 authorizations (to be provided with the Traffic and Revenue Report and the Circuit Capacity Report); <sup>25</sup> and information about the Filing Entity's satellite licenses and cable landing licenses (to be provided with the Circuit Capacity Report). <sup>26</sup>

## 2. Certification of Accuracy and Completeness of Reports

- 32. Filing Entities must certify on the Registration Form the accuracy and completeness of the data filed in the accompanying Traffic and Revenue Report or Circuit Capacity Report. An officer of the Filing Entity must certify the accuracy and completeness of the Filing Entity's section 43.62 information. The Commission will not accept a report until the Filing Entity provides the requisite certification.
- 33. For the purposes of certification, an officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement, certificate creating a limited liability company, or comparable document) and is typically the president, vice president for operations, vice president for finance, comptroller, treasurer, or someone in a comparable position. If the Filing Entity is a sole proprietorship, the owner must certify the accuracy and completeness of the Filing Entity's section 43.62 information.
- 34. As indicated on the Registration Form, the certification must contain the signature of the certifying official; the printed name of the certifying official; the title of the certifying official; the physical address, telephone number, and e-mail address of the certifying official; and the Filing Entity's official contact or attorney of record, including physical address, telephone number, and e-mail address.
- 35. A Filing Entity has not met its filing deadline until the Commission has received a certified filing of the Filing Entity's section 43.62 report.

<sup>&</sup>lt;sup>23</sup> The FRN is a ten-digit number that the Commission uses to identify a Filing Entity for purposes of the Commission's Licensing/Filing systems and its Revenue Accounting Management Information System (RAMIS). Filing Entities may obtain an FRN through the Commission Registration System (CORES), which they may access at <a href="https://gullfoss2.fcc.gov/cores/CoresHome.html">https://gullfoss2.fcc.gov/cores/CoresHome.html</a>. Filing Entities should ensure that their contact information is correct in the CORES system. For assistance in using CORES, Filing Entities may contact the CORES help desk at (877) 480-3201 or send an e-mail to <a href="https://cores.gov/cores/cores-co

<sup>&</sup>lt;sup>24</sup> See paragraphs 14-16.

<sup>&</sup>lt;sup>25</sup> A complete list of the Filing Entity's international section 214 authorizations is required the first time that the Filing Entity files its section 43.62 Traffic and Revenue Report and Circuit Capacity Report. Subsequent filings need only contain additions and deletions to the list of section 214 authorizations.

<sup>&</sup>lt;sup>26</sup> A complete list of the Filing Entity's cable landing licenses and satellite licenses is required the first time that the Filing Entity files its section 43.62 Circuit Capacity Report. Subsequent filings need only contain additions and deletions to the list of these licenses.

#### 3. Confidential Treatment of Filed Information

- 36. Filing Entities may request on the Registration Form confidential treatment of the data filed in their Traffic and Revenue Report or Circuit Capacity Report.<sup>27</sup> Filing Entities may request confidential treatment of the data filed in the following reports:
  - Traffic and Revenue Report
  - Circuit Capacity Report International Terrestrial and Satellite Circuits
  - Circuit Capacity Report International Submarine Cable Capacity Cable Operators
  - Circuit Capacity Report International Submarine Cable Capacity Capacity Holders

They may do so by checking the appropriate box to request confidential treatment under section 0.459 of the Commission's rules and certifying that the filed data are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. This certification must be by the same company official who certifies the accuracy and completeness of the accompanying report. We encourage cable operators to continue to make basic data about the cables they operate publicly available so that the American public may continue to have access to a complete listing of available and planned cable capacity on the U.S. end of all international submarine cables.

37. Checking the box and certifying the data as warranting confidential treatment affords a Filing Entity the opportunity to defer the need to provide justification for confidential treatment until another party requests access to the data. Upon receipt of a request for inspection of the data, we will notify the Filing Entity of the request and the Filing Entity will be required to justify continued confidential treatment pursuant to section 0.459 of the Commission's rules.

## III. TRAFFIC AND REVENUE REPORT (Services Checklist and Schedules 1-4)

- 38. Pursuant to section 43.62(b) of the Commission's rules, <sup>28</sup> all U.S. International Authorization Holders and all U.S. International Service Providers that provided ICS during the reporting period must file the Traffic and Revenue Report.
- 39. This section describes the reporting requirements for the Traffic and Revenue Report (Services Checklist and Schedules 1-4). Section III-A of the Filing Manual describes the Services Checklist. Section III-B deals with the reporting requirements for various categories of International Telecommunications Service and International VoIP Service Connected to the PSTN. Section III-C of the Filing Manual discusses reporting of information by foreign point. Section III-D of the Filing Manual supplements section III-B with technical descriptions of the international service data to be filed and includes additional filing requirements.
- 40. **Figure 1** summarizes the major types of international services provided by U.S. International Service Providers and the filing requirements for each. The list is meant as a guide only, and readers should refer to the text of the Filing Manual for detailed descriptions of services and filing requirements.

<sup>&</sup>lt;sup>27</sup> 47 C.F.R. § 43.62(c)(2).

<sup>&</sup>lt;sup>28</sup> 47 C.F.R. § 43.62(b).

Figure 1
Filing Guide for Traffic and Revenue Report

	Schedules to Be Filed		
International Service	Less than \$5 million in revenue	\$5 million or greater in revenue	
U.SBilled ICS provided on a Facilities basis	Services Checklist Schedule 1 Schedule 2	Services Checklist Schedule 1 Schedule 2	
U.SBilled ICS provided on an Resale basis	Services Checklist	Services Checklist Schedule 2	
Foreign-Billed ICS	Services Checklist Schedule 1	Services Checklist Schedule 1	
Traditional Transiting ICS	Services Checklist Schedule 2	Services Checklist Schedule 2	
Reoriginated Foreign ICS	Services Checklist Schedule 1 Schedule 2	Services Checklist Schedule 1 Schedule 2	
International Private Line Service	Services Checklist Schedule 3	Services Checklist Schedule 3	
International Miscellaneous Services	Services Checklist	Services Checklist Schedule 4	

#### A. The Services Checklist

41. The Services Checklist contains seven main boxes that elicit basic information about the operations, if any, of Filing Entities during the preceding calendar year. The Commission uses the Services Checklist to determine which schedules, if any, Filing Entities must file. Filing Entities should check the boxes that pertain to them.

**Box 1** (No International Telecommunications Service or International VoIP Service Connected to the PSTN). The Filing Entity provided no International Telecommunications Service or International VoIP Service Connected to the PSTN during the reporting period. Entities that check this box do not file Schedules 1-4.

**Box 2** (U.S.-Billed Facilities ICS). The Filing Entity provided U.S.-Billed Facilities ICS during the reporting period. Entities that check this box must file service data on Schedules 1 and 2.

**Box 3** (Foreign-Billed ICS). The Filing Entity provided Foreign-Billed ICS during the reporting period. Entities that check this box must file service data on Schedule 1. **Box 4** (Traditional Transiting ICS). The Filing Entity provided Traditional Transiting ICS during the reporting period. Entities that check this box must file service data on Schedule 2.

**Box 5** (ICS Resale). The Filing Entity provided ICS Resale during the reporting period. Entities that check this box must indicate whether they billed customers a total of \$5 million or more for ICS Resale provided during the reporting period. Entities that billed customers a total of \$5 million or more for ICS Resale provided during the reporting period, or that provided Facilities ICS in addition to any dollar amount of ICS Resale, must

file service data on Schedule 2.

**Box 6** (International Private Line Service). The Filing Entity provided International Private Line Service during the reporting period. Entities that check this box must file service data on Schedule 3.

**Box 7** (International Miscellaneous Services). The Filing Entity provided one or more International Miscellaneous Services during the reporting period. Entities that check this box must indicate whether they billed customers a total of \$5 million or more for any International Miscellaneous Service provided during the reporting period. Entities that did so must file Schedule 4 for each such service.

# B. Reporting of International Telecommunications Service and International VoIP Service Connected to the PSTN

42. U.S. International Service Providers must report international traffic data for three categories of services: (1) International Calling Service (ICS); (2) International Private Line Service; and (3) International Miscellaneous Services. The reporting requirements for these categories are described in detail below.

## 1. Reporting of ICS (Schedules 1 and 2)

- 43. This section describes the reporting requirements for International Calling Service (ICS). As described in paragraph 8, International Calling Service (ICS) is defined as International Message Telephone Service (IMTS) and International VoIP Service Connected to the PSTN, including International Call Completion Service for IMTS or International VoIP Service Connected to the PSTN.
- 44. IMTS is the provision of message telephone service (MTS) between the United States and a foreign point. The term "message telephone service" refers to the transmission and reception of speech and low-speed dial-up data over the public switched telephone network (PSTN). International Call Completion Service for IMTS is included within the definition of IMTS.
- 45. For section 43.62 reporting purposes, IMTS includes international services with dedicated access if the calls are routed through the PSTN in the United States or a foreign point. Accordingly, IMTS includes international wide-area telephone service (WATS), toll-free service (e.g., 800 service), pay-for-call service (e.g., 900 service), international custom network services, integrated services digital network (ISDN) services, conference services, country-direct service, and country-beyond service. IMTS also includes international service over virtual private networks (VPNs) that originates or terminates on the PSTN.
- 46. Historically, IMTS calls were conveyed jointly by a U.S. International Carrier and a Foreign Carrier interconnecting at the theoretical midpoint of jointly owned international circuits using circuit-switched technology.<sup>29</sup> Today, service providers may transmit IMTS calls over

<sup>&</sup>lt;sup>29</sup> See Appendix B for a definition of Foreign Carrier. U.S. International Carriers traditionally provided IMTS through "joint operating agreements" with Foreign Carriers. Under traditional joint operating agreements, U.S. International Carriers provide IMTS with a "foreign correspondent" carrier through joint ownership of international circuits between the United States and a foreign point. The joint operating agreement typically specifies the rights, duties, and legal obligations of each correspondent; establishes arrangements governing the routing of traffic; and sets the "accounting rate" per unit (usually per minute) of IMTS traffic. The accounting rate is a negotiated amount per unit that provides the basis for "settling" traffic balances between the correspondents. The correspondents split the accounting rate to compensate

circuit-switched networks, Internet Protocol (IP) or other high-speed data networks, or over a combination of such networks. Under section 43.62 of the Commission's rules, U.S. International Service Providers must report all IMTS calls regardless of the particular transmission technology used in their networks.<sup>30</sup>

- 47. International VoIP Service Connected to the PSTN is a service between the United States and any foreign point that: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user's location; (3) requires Internet Protocol-compatible customer premise equipment; and (4) permits users generally to receive calls that originate on the public switched telephone network (PSTN) or to terminate calls to the PSTN. Thus, International VoIP Service Connected to the PSTN consists of Interconnected VoIP Service<sup>31</sup> and "one-way" VoIP services, <sup>32</sup> between the United States and any foreign point. International Call Completion Service for International VoIP Service Connected to the PSTN is included within the definition of International VoIP Service Connected to the PSTN.
- 48. As noted, ICS also includes International Call Completion Service for IMTS or International VoIP Service Connected to the PSTN. Today, call completion services may be provided using circuit-switched technology or VoIP technology, or a combination of both. 33 Under section 43.62 of the Commission's rules, U.S. International Service Providers must report all International Call Completion Service provided or obtained regardless of the particular technology used.
- 49. This Filing Manual requires U.S. International Service Providers to report statistics for all ICS that they provided during the reporting period, with limited exceptions as provided in paragraphs 68-85.

#### a. Classification of Calls as Facilities ICS or ICS Resale

50. ICS is offered to the public in a variety of technical and commercial arrangements. Multiple service providers are involved. The definitional structure incorporated in this Filing Manual is intended to have one service provider file detailed information about each ICS call and any other service providers involved in providing the call to report only summary information. For this purpose, the U.S. International Service Provider that will file detailed information is the entity that has a commercial arrangement for the exchange of ICS traffic with a Foreign Service

each correspondent for its handling of the call. The per-minute expense incurred by one carrier to the other for IMTS call completion services under this arrangement is termed the "settlement rate" and the amount of the expense is termed "settlements." The term "settlements" denotes the expense incurred by a carrier for call completion services provided by a correspondent, not the net amount paid by one carrier to another after reciprocal call completion expenses are offset.

<sup>&</sup>lt;sup>30</sup> See Petition for Declaratory Ruling that AT&T's Phone-to-Phone IP Telephony Services are Exempt from Access Charges, WC Docket No. 02-361, Order, FCC 04-97, 19 FCC Rcd 7457 (2004).

<sup>&</sup>lt;sup>31</sup> 47 C.F.R. § 9.3.

<sup>&</sup>lt;sup>32</sup> One-way VoIP services enable users to terminate calls to the PSTN but do not permit users to receive calls that originate on the PSTN, or enable users to receive calls from the PSTN but do not permit the user to make calls terminating to the PSTN.

<sup>&</sup>lt;sup>33</sup> VoIP technology used to complete ICS calls rely on call manager services and PSTN gateways to convert a telecommunications signal between IP and circuit-switched transmission formats and allow interaction of VoIP calls with the PSTN. See, *e.g.*, Handley, M., et al., *SIP: Session Initiation Protocol*, RFC-2543, The Internet Society, (1999), available at <a href="https://www.ietf.org/rfc/rfc2543.txt">https://www.ietf.org/rfc/rfc2543.txt</a>. Service providers may receive or deliver ICS traffic in VoIP format over the public Internet or a managed IP facility.

Provider.<sup>34</sup> For section 43.62 reporting purposes, this provider reports the call as Facilities ICS traffic. Other U.S. International Service Providers that resell the call report the call as ICS Resale traffic. The following paragraphs provide a more detailed explanation of the distinction between Facilities ICS and ICS Resale.

#### (i) Facilities ICS

- 51. For section 43.62 reporting purposes, Facilities ICS is defined as the provision of ICS through a commercial arrangement between a U.S. International Service Provider and a Foreign Service Provider (including a foreign affiliate of the U.S. International Service Provider) for International Call Completion Service.
- 52. A U.S. International Service Provider shall report all ICS traffic for which it has a commercial arrangement for International Call Completion Service with a Foreign Service Provider as Facilities ICS, with limited exceptions as provided in paragraphs 68-85. A U.S. International Service Provider shall report as Facilities ICS:
  - ICS traffic for which the U.S. International Service Provider obtains call completion service to a foreign point by means of a commercial arrangement with a Foreign Service Provider.
  - ICS traffic for which the U.S. International Service Provider provides call completion service to the United States by means of a commercial arrangement with a Foreign Service Provider.

#### (ii) ICS Resale

- 53. For section 43.62 reporting purposes, ICS Resale is the provision of U.S.-Billed ICS by a U.S. International Service Provider through the resale of ICS purchased from another U.S. International Service Provider. The U.S. International Service Provider purchasing U.S.-Billed ICS and reselling it is termed a "reseller." The underlying service provider either provides Facilities ICS or it, in turn, is reselling the ICS of another U.S. International Service Provider. A U.S. International Service Provider that provides ICS by purchasing International Call Completion Service from another U.S. International Service Provider is reselling that service provider's ICS.
- 54. A U.S. International Service Provider shall report all ICS traffic that it provides through the resale of ICS purchased from another U.S. International Service Provider as ICS Resale.

# b. Classification of ICS Calls as U.S.-Billed, Foreign-Billed or Traditional Transiting ICS

- 55. Filing Entities must classify each Facilities ICS call as U.S.-Billed, Foreign-Billed, or Traditional Transiting. All ICS Resale calls are classified as U.S.-Billed.
- 56. A U.S.-Billed ICS call is defined as an ICS call that originates or terminates in the United States<sup>36</sup> and that is billed by a U.S. International Service Provider to an end-user customer

<sup>&</sup>lt;sup>34</sup> See Appendix B for a definition of Foreign Service Provider.

<sup>&</sup>lt;sup>35</sup> A U.S. International Service Provider may resell ICS provided by another U.S. International Service Provider and provide ICS on a Facilities ICS basis. Thus a single U.S. International Service Provider may be both an ICS reseller and a provider of Facilities ICS.

<sup>&</sup>lt;sup>36</sup> Examples of U.S.-Billed ICS that terminate in the United States are collect and 800-type toll-free calls that are placed at telephones outside of the United States and billed to the U.S. telephone that receives the

- or to a U.S. International Service Provider that is taking the service for resale; or a Reoriginated Foreign ICS<sup>37</sup> call that is billed by a U.S. International Service Provider to a Foreign Service Provider; or a country-beyond call.<sup>38</sup>
- 57. A Foreign-Billed ICS call is an ICS call that originates or terminates with an enduser in the United States, and that is billed by a Foreign Service Provider. <sup>39</sup> The U.S. International Service Provider that provides International Call Completion Service to the United States for a Foreign-Billed ICS call must report the call as Foreign-Billed ICS pursuant to section 43.62 of the Commission's rules.
- 58. A Traditional Transiting ICS call is an ICS call from a foreign point that (a) transits the United States prior to completion at a foreign point and (b) is settled at a rate agreed upon by the Foreign Service Provider in the origination foreign point and the Foreign Service Provider in the destination foreign point. The U.S. International Service Provider that provides the transiting service is reimbursed for its handling and transmission of the traffic by the Foreign Service Provider in the origination foreign point. Traditional Transiting ICS is discussed in more detail in paragraphs 68-69.
- 59. **Figure 2** illustrates that U.S.-Billed ICS can be provided as Facilities ICS or as ICS Resale, while Foreign-Billed and Traditional Transiting ICS always are provided as Facilities ICS.

Figure 2
Potential Combinations among ICS Categories

	Facilities ICS	ICS Resale
U.SBilled ICS	Yes	Yes
Foreign-Billed ICS	Yes	No
Traditional Transiting ICS	Yes	No

#### c. Reporting of ICS

60. Report ICS data on Schedule 1 ("U.S.-Billed and Foreign-Billed Facilities ICS Traffic – By Foreign Point") and Schedule 2 ("World-Total Data for U.S.-Billed and Traditional Transiting ICS"). Include on Schedule 1 various data for U.S.-Billed Facilities ICS and Foreign-Billed ICS by foreign point, as described below and in paragraphs 68-85, 93-99, and 101-126. Include on Schedule 2 various world-total data for U.S.-Billed ICS and Traditional Transiting ICS, as described below and in paragraphs 68-85 and 101-121.

#### (i) Reporting of Facilities ICS

61. Each U.S. International Service Provider shall report annual section 43.62 statistics,

call by a U.S. International Service Provider and calls that are placed in foreign points using U.S. calling cards.

<sup>&</sup>lt;sup>37</sup> Reoriginated Foreign ICS is described in paragraphs 70-73.

<sup>&</sup>lt;sup>38</sup> Country-beyond service is described in paragraphs 80-82.

<sup>&</sup>lt;sup>39</sup> Examples of Foreign-Billed ICS calls that originate in the United States are collect and 800-type subscriber toll-free calls that are placed at telephones in the United States and billed to the foreign telephone that receives the call by a Foreign Service Provider and calls placed in the United States using foreign calling cards.

as described in this Filing Manual, for all U.S.-Billed Facilities ICS calls that it provided during the reporting period as well as all Foreign-Billed ICS calls for which it provided International Call Completion Service to the United States. Do not report the U.S. inbound leg of Reoriginated Foreign ICS.<sup>40</sup>

- 62. For U.S.-Billed Facilities ICS, aggregate the data for customer revenue, minutes completed on foreign networks, and settlement payouts by foreign point, and report the aggregated amount on Schedule 1 as indicated on that schedule. For some foreign points, a U.S. International Service Provider may pay separate settlement rates<sup>41</sup> for call completion services to fixed-line and mobile networks. In such cases, additionally disaggregate "Total Minutes Completed on Foreign Networks" (column d) into "Minutes Completed on Foreign Fixed-Line Networks" (column b) and "Minutes Completed on Foreign Mobile Networks" (column c) and additionally disaggregate "Total Settlement Payouts" (column g) into "Settlement Payouts for Call Completion on Foreign Fixed-Line Networks" (column e) and "Settlement Payouts for Call Completion on Foreign Mobile Networks" (column f).
- 63. On Schedule 2, report U.S.-Billed Facilities ICS minutes and customer revenue on a world-total basis on Line 1.A ("Total U.S.-Billed Facilities ICS") and disaggregate these amounts for inclusion in the appropriate customer categories on Lines 2.A through 2.D ("U.S.-Billed ICS By Customer Category"). There is a slight difference between U.S.-Billed Facilities ICS minutes reportable on Schedules 1 and 2. See paragraph 113 for more information.
- 64. For Foreign-Billed ICS, aggregate data for minutes and settlement receipts by foreign point and report the data on Schedule 1 as indicated on that schedule.
- 65. For Traditional Transiting ICS, report data for minutes and customer revenue on Schedule 2 only, on a world-total basis, as indicated on that schedule.

#### (ii) Reporting of ICS Resale

- 66. Each U.S. International Service Provider shall report annual section 43.62 statistics, as described in this Filing Manual, for all ICS Resale calls it provided during the reporting period, with the following exception. U.S. International Service Providers with revenue from ICS Resale 42 under \$5 million for the reporting period and no revenue from Facilities ICS for the reporting period are not required to include ICS Resale statistics in their section 43.62 report. All other U.S. International Service Providers shall report minute and customer revenue statistics for ICS Resale on a world-total basis on Schedule 2, Line 1.B ("Total ICS Resale"), and shall disaggregate these amounts for inclusion in the appropriate customer categories on Lines 2.A through 2.D ("U.S.-Billed ICS By Customer Category").
  - 67. A U.S. International Service Provider that provides both Facilities ICS and ICS

<sup>&</sup>lt;sup>40</sup> The inbound leg of Reoriginated Foreign ICS is described in paragraph 71.

<sup>&</sup>lt;sup>41</sup> In recent years, U.S. International Service Providers and Foreign Service Providers have increasingly provided ICS under a variety of non-traditional interconnection arrangements. For instance, service providers may carry traffic over wholly-owned international circuits and interconnect with each other at either U.S. or foreign cable landing stations. Also, service providers may connect VoIP calls to the PSTN using various protocols. In such cases, service providers enter into payment arrangements for International Call Completion Service that do not conform to the traditional accounting rate regime. In this Filing Manual, the terms "settlement rate," "settlements," "settlement payouts," "settlement receipts," etc. refer to International Call Completion Service provided under non-traditional arrangements as well as traditional arrangements.

<sup>&</sup>lt;sup>42</sup> Note that "revenue from ICS Resale" or "ICS Resale revenue" refers to revenue obtained from the resale of ICS, not revenue from the sale of Facilities ICS to resellers.

Resale shall report data for Facilities ICS separately from data for ICS Resale, except that it must aggregate Facilities ICS and ICS Resale data for purposes of filing information by customer categories on Schedule 2 (U.S.-Billed ICS – By Customer Category).

## d. Specialized Calling Arrangements

## (i) Traditional Transiting ICS

- 68. There are two different reporting procedures that U.S. International Service Providers shall use for reporting revenue for Traditional Transiting ICS traffic, <sup>43</sup> depending upon the type of arrangement under which the U.S. International Service Provider and Foreign Service Provider settle the traffic: (1) direct payment arrangement; <sup>44</sup> or (2) cascade settlement arrangement. <sup>45</sup> Under a direct payment arrangement, a U.S. International Service Provider shall report the transiting fee it receives for transmitting Traditional Transiting ICS as revenue on Line 3.T of Schedule 2. Under a cascade settlement arrangement, a U.S. International Service Provider shall report the "net settlement receipt" (*i.e.*, the total receipt from the originating Foreign Service Provider less the amount the U.S. International Service Provider remits to the terminating Foreign Service Provider) on Line 3.T of Schedule 2. Note that although these amounts are reported as "revenues" under section 43.62 of the Commission's rules, they may be considered as "settlement receipts," and not revenues, for other Commission purposes. <sup>46</sup>
- 69. Do not include data for Traditional Transiting ICS in any statistics reported on Schedules 1 or 2 except on Line 3.T of Schedule 2.

## (ii) Reoriginated Foreign ICS

70. Reoriginated Foreign ICS refers to ICS traffic from a foreign point that is transmitted to the United States for retransmission to a destination foreign point, but that is not handled as Traditional Transiting ICS. <sup>47</sup> The originating Foreign Service Provider pays the intermediate U.S. International Service Provider an agreed-upon fee to carry the call to the destination foreign point, and the U.S. International Service Provider terminates such calls under the call completion arrangements that it normally uses to terminate calls to the destination foreign

<sup>&</sup>lt;sup>43</sup> Traditional Transiting ICS is described in paragraph 58.

<sup>&</sup>lt;sup>44</sup> A direct payment arrangement refers to Traditional Transiting ICS traffic handled by U.S. International Service Providers in which the originating Foreign Service Provider remits a payment directly to the terminating Foreign Service Provider to compensate it for terminating the call, without involving the U.S. International Service Provider. In such an arrangement, the originating Foreign Service Provider would also remit separately to the U.S. International Service Provider a transiting fee to compensate the U.S. International Service Provider for its handling and transmission of the Traditional Transiting ICS traffic.

<sup>&</sup>lt;sup>45</sup> A cascade settlement arrangement refers to an arrangement under which a U.S. International Service Provider carries a Traditional Transiting ICS call between two foreign points (the foreign point of origin and the destination foreign point). The originating Foreign Service Provider remits to the U.S. International Service Provider an amount of money intended to provide both a transiting fee to the U.S. International Service Provider and the settlement amount that it owes the terminating Foreign Service Provider. The U.S. International Service Provider retains the transiting fee and remits the settlement payment to the terminating Foreign Service Provider on behalf of the originating Foreign Service Provider at the settlement rate agreed between the originating and terminating Foreign Service Providers.

<sup>&</sup>lt;sup>46</sup> See, e.g., Form 499-A Instructions at pp. 20-21.

<sup>&</sup>lt;sup>47</sup> In general, reoriginated ICS may refer to either foreign traffic routed through the United States to a destination foreign point or U.S. traffic routed through an intermediate foreign point to a destination foreign point. For the reporting treatment of U.S. traffic routed through an intermediate foreign point to a destination foreign point, see paragraph 97.

- point. Reoriginated Foreign ICS differs from Traditional Transiting ICS with regard to billing arrangements, not routing. Reoriginated Foreign ICS has supplanted Traditional Transiting ICS as the predominant arrangement for traffic transiting through the United States.
- 71. A Reoriginated Foreign ICS call has two components: an inbound leg from the originating foreign point to the United States and an outbound leg from the United States to the destination foreign point. To avoid double-counting the call, report only the outbound leg of the call
- 72. If the U.S. International Service Provider conveys the call out of the United States on a Facilities ICS basis, it shall classify the outbound leg of the call as U.S.-Billed Facilities ICS and include all relevant statistics in Schedules 1 and 2. Assign the call to the foreign point that is the ultimate destination of the call. Include all payments received for carrying the call as customer revenue in column (a) of Schedule 1 and include the minutes associated with the outbound leg of the call in column (d) of Schedule 1 and columns (b) or (c), as appropriate. Include the amount paid for call completion services to the destination foreign point as "Settlement Payouts" in column (g) of Schedule 1 and columns (e) or (f), as appropriate. Include customer revenue and minutes for the call in world-total statistics on Line 1.A ("Total U.S.-Billed Facilities ICS") and Line 2.D ("Reoriginated Foreign Traffic") of Schedule 2.
- 73. If the U.S. International Service Provider arranges to convey the call out of the United States on an ICS Resale basis (*i.e.*, through a second U.S. International Service Provider), the first U.S. International Service Provider shall classify the outbound leg of the call as ICS Resale and include it in Schedule 2 statistics, by including the minutes associated with the outbound leg of the call and all payments it receives for carrying the call on Line 1.B ("Total ICS Resale") and Line 2.D ("Reoriginated Foreign Traffic") of Schedule 2. The second U.S. International Service Provider shall report the call as U.S.-Billed ICS provided to U.S. Resellers (Line 2.C), not as Reoriginated Foreign Traffic (Line 2.D), and shall report the call as either Facilities ICS or ICS Resale, depending on how it arranges to convey the call out of the United States.

## (iii) Spot Market Traffic

- 74. A spot market is a market where service providers can buy or sell call completion services for immediate delivery. A spot market customer, or "contracting service provider," is a service provider that enters into a contract to buy or sell call completion services by interconnecting at a spot market point of presence. A spot market owner is a person or entity that facilitates the transaction between contracting service providers (who may not know each other's identity) by physically interconnecting the customers and acting as their commercial intermediary. The spot market owner typically owns one or more points of presence that serve as interconnection points for contracting service providers. The spot market owner may, in some cases, enter into arrangements with a contracting service provider to convey its traffic between spot market points of presence, including points of presence outside the United States.
- 75. For section 43.62 reporting purposes, a contracting service provider treats an ICS call exchanged at a spot market point of presence in the United States as it would treat an ICS call exchanged directly with another service provider. A contracting service provider that buys call completion services to a foreign point by interconnecting at a spot market point of presence in the United States shall report the call as ICS Resale. A contracting service provider that sells call completion services to a foreign point by interconnecting at a spot market point of presence within the United States shall report the call as either U.S.-Billed Facilities ICS or as ICS Resale, depending on how it arranges to complete the call, and shall report as customer revenue the

payment that it requires for providing the call completion service. 48

- 76. A spot market owner that provides intermediary services for an ICS call at a U.S. point of presence or between U.S. points of presence and does not convey the call outside the United States is not providing a reportable service under section 43.62 of the Commission's rules.
- 77. A spot market owner that transmits an ICS call between a buying contracting service provider in the United States and a selling contracting service provider in a foreign point shall report the call as U.S.-Billed Facilities ICS. Report as customer revenue the amount the buying contracting service provider has agreed to pay for call completion service. Report as settlement payouts the payment that the selling contracting service provider in a foreign point requires to provide call completion service for the call.
- 78. A spot market owner that transmits an ICS call between a buying contracting service provider in a foreign point and a selling contracting service provider in the United States for completion to an end-user in the United States shall report the call as Foreign-Billed ICS. Report as settlement receipts the amount the buying contracting service provider has agreed to pay for call completion service. The selling contracting service provider is not providing a reportable service under section 43.62 of the Commission's rules.
- 79. A spot market owner that transmits an ICS call between a buying contracting service provider in a foreign point and a selling contracting service provider in the United States for ultimate termination in a foreign point shall report the call as Reoriginated Foreign ICS. <sup>49</sup> The selling contracting service provider shall report the call as ordinary U.S.-Billed ICS. <sup>50</sup> A spot market owner that transmits an ICS call through the United States, between a buying contracting service provider in a foreign point and a selling contracting service provider in a foreign point, shall report the call as Reoriginated Foreign ICS. <sup>51</sup>

#### (iv) Country-Beyond and Related Services

80. Country-beyond service is ICS provided and billed by a U.S. International Service Provider to a customer located in a foreign point in which case the customer, using a credit card or calling card issued by the U.S. International Service Provider, calls a telephone number in another foreign point. The customer accesses country-beyond service by dialing a local number

<sup>&</sup>lt;sup>48</sup> The selling contracting service provider shall report the call as either Facilities ICS on Schedule 1 and Line 1.A of Schedule 2 or ICS Resale on Line 1.B of Schedule 2, depending on how it arranges to convey the call out of the United States. In either case, it shall report the call as provided to U.S. Resellers on Line 2.C of Schedule 2.

<sup>&</sup>lt;sup>49</sup> The spot market owner should not report the inbound leg of the call, and shall report the outbound leg as ICS Resale on Line 1.B of Schedule 2 and Reoriginated Foreign Traffic on Line 2.D of Schedule 2. The spot market owner shall report as customer revenue the amount the buying contracting service provider has agreed to pay for call completion service.

<sup>&</sup>lt;sup>50</sup> The selling contracting service provider shall report the call as either Facilities ICS on Schedule 1 and Line 1.A of Schedule 2 or ICS Resale on Line 1.B of Schedule 2, depending on how it arranges to convey the call out of the United States. In either case, it shall report the call as provided to U.S. Resellers on Line 2.C of Schedule 2.

<sup>&</sup>lt;sup>51</sup> The spot market owner should not report the inbound leg of the call, and shall report the outbound leg as U.S.-Billed Facilities ICS on Schedule 1 and Line 1.A of Schedule 2 and as Reoriginated Foreign Traffic on Line 2.D of Schedule 2. The spot market owner shall report as customer revenue the amount the buying contracting service provider has agreed to pay for call completion service and as settlement payout the payment that the selling contracting service provider in a foreign point requires to provide call completion service for the call.

in the foreign point in which the customer is located or a subscriber toll-free number in the United States and entering a special code that gives the customer a U.S. dial-tone. The customer then dials the telephone number in the destination foreign point.

- 81. The call consists of two components: an inbound leg from the customer in the originating foreign point to the United States and a second, outbound leg from the United States to the destination foreign point. A U.S. International Service Provider shall report each leg of a country-beyond service call separately, because the provider makes a settlement payout for each leg. It shall classify each leg as U.S.-Billed ICS. Classify the inbound leg by the foreign point in which the call originated, and the outbound leg shall be classified by the foreign point in which the call terminated. Divide the total customer revenue between the inbound and outbound legs in a way that is consistent with the cost basis of the total amount billed to the calling party. Report minutes and settlement payouts for each leg.
- 82. Call-back service refers to an arrangement in which a customer in a foreign point uses foreign facilities to dial a pre-assigned telephone number in the United States. The call is not completed, but the presence of signaling information triggers a call back to the customer, who receives a dial tone from the U.S. International Service Provider's switch. The customer can then place a call via the outbound switched service of the U.S. International Service Provider. Customers also may arrange to make U.S.-Billed ICS calls between foreign points using an Internet website to set up the call. For section 43.62 reporting purposes, U.S. International Service Providers shall report all arrangements for U.S.-Billed ICS calls between foreign points in the same way as described above for country-beyond service.

## (v) Country-Direct and Related Services

- 83. Country-direct service is ICS provided by a U.S. International Service Provider to a customer located in a foreign point in which case the customer, using a credit card or calling card issued by the U.S. International Service Provider, calls a telephone number in the United States. The customer accesses country-direct service by dialing a local telephone number in the foreign point in which the customer is located or a toll free number in the United States and entering a special code that gives the customer a U.S. dial tone. The customer then dials the number of the called party in the United States.
- 84. There is only one international leg to a country-direct service call (an inbound leg from the customer in the originating foreign point to the called party in the United States). The U.S. International Service Provider shall report the call as U.S.-Billed ICS.
- 85. U.S. International Service Providers shall report call-back service that terminates in the United States, as well as other arrangements in which U.S.-Billed ICS calls to the United States are arranged from a foreign point, in the same way as described above for country-direct service.

## 2. Reporting of International Private Line Service (Schedule 3)

86. This section describes the reporting requirements for International Private Line Service. International Private Line Service is defined as private line service between the United States and a foreign point. Private line service refers to making available to a customer on a common carrier basis a circuit for a specified period of time for the customer's exclusive use. A circuit refers to a path for electromagnetic transmission of information between two or more points, including transmission by submarine or terrestrial cable, satellite, wire, or radio. In addition to a dedicated channel, a service guarantee for electromagnetic transmission of information between two or more points at an agreed-upon data speed is considered a circuit for reporting International Private Line Service under section 43.62 of the Commission's rules. International Private Line Service includes the provision on a common carrier basis of dedicated

circuits using specialized transmission protocols, such as frame relay, asynchronous transfer mode (ATM), Internet Protocol (IP), or other packet-switching technologies.

- 87. In traditional arrangements, in which a U.S. International Carrier provides International Private Line Service over facilities jointly owned with a Foreign Carrier (called a "foreign correspondent"), the U.S. portion of the international circuit terminates at the "theoretical midpoint" between the United States and the destination foreign point. The remaining half of the international private line, from the theoretical midpoint to the foreign point, is provided by the U.S. International Carrier's foreign correspondent. The U.S. International Carrier and the Foreign Carrier may bill the customer separately for their half of the service. Alternately, one of the carriers may bill the customer on behalf of both carriers and share half the revenue with its correspondent. In non-traditional arrangements, however, a carrier may provide International Private Line Service over an international circuit that it wholly owns or leases, interconnecting with a correspondent carrier at a cable landing station or other interconnection point.
- 88. Any U.S. International Carrier that provides International Private Line Service through ownership, indefeasible-right-of-user, or leasehold interest in bare capacity in the U.S. end of an international facility regardless of whether the underlying facility is a common carrier or non-common carrier facility shall report International Private Line Service statistics for the reporting period on Schedule 3 as "Service Provided over Facilities Circuits." A U.S. International Carrier that provides International Private Line Service through a lease on a common carrier basis of circuits from a U.S. International Carrier shall report International Private Line Service statistics for the reporting period on Schedule 3 as "Service Provided over Resold Circuits."
- 89. The level of geographical aggregation for data to be reported for International Private Line Service is described in paragraphs 93-96 and 100. The service data to be filed for International Private Line Service is described in paragraphs 101-112 and 127-132.

#### 3. Reporting of International Miscellaneous Services (Schedule 4)

- 90. This section describes the reporting requirements for International Miscellaneous Services provided by U.S. International Carriers. Carriers shall report statistics for each International Miscellaneous Service that they provided during the reporting period, except as described below.
- 91. International Miscellaneous Service refers to any International Telecommunications Service other than ICS and International Private Line Service. International Miscellaneous Services include high-speed data network services between the United States and a foreign point that are provided on a common carrier basis, except for components of such services that are provided to an individual customer as dedicated U.S. international circuits (and thus classifiable as International Private Line Service). Examples of high-speed data network services that may be classifiable as an International Miscellaneous Service are Frame Relay, ATM, IP, and other packet-switched services that are offered on a common carrier basis between the United States and a foreign point. Other common carrier services that may be classifiable as an International Miscellaneous Service include switched video service, occasional television service, and point-to-multipoint satellite service offered between the United States and a foreign point.
- 92. U.S. International Carriers must file data for each International Miscellaneous Service provided during the reporting period on Schedule 4, as indicated on that schedule, except in the case in which customer revenue for the International Miscellaneous Service was less than

<sup>&</sup>lt;sup>52</sup> In some cases of joint provisioning, each carrier has an undivided half-interest in the circuit.

\$5 million for the reporting period. A U.S. International Carrier shall report revenue separately for each International Miscellaneous Service that it provides. For each International Miscellaneous Service, revenue for all foreign points shall be aggregated and reported on a world-total basis. No adjustments to revenue shall be made to reflect payments to other carriers, whether U.S. or foreign. More information about service data to be filed for International Miscellaneous Services is provided in paragraphs 101-112 and 133.

## C. Reporting by Foreign Point

- 93. U.S. International Service Providers that are required to file Schedules 1 or 3 shall provide information on those Schedules by foreign point. The foreign points for which statistics shall be aggregated for section 43.62 reporting purposes are listed in Table 3 of the FCC's publication *International Points Used for FCC Part 43 Reporting Purposes (International Points)*. <sup>53</sup> Typically, foreign points listed in Table 3 are foreign countries together with their territories, although there may be some foreign points that are not countries (*e.g.*, Antarctica) and there are other exceptions.
- 94. Table 1 of the *International Points* contains a comprehensive list of international points. Table 2 shows the international points that must be consolidated for section 43.62 reporting purposes. For example, in Table 1, Dubai and the United Arab Emirates are listed separately. Table 2 indicates that statistics for traffic between Dubai and the United States shall be consolidated with statistics for traffic between the United Arab Emirates and the United States for section 43.62 reporting purposes.
- 95. Schedules 1 and 3 of the Traffic and Revenue Report contain entries for each foreign point identified in Table 3 of *International Points*. See Appendix D.
- 96. U.S. International Service Providers shall provide data only for foreign points listed in Table 3, and shall not show multiple entries for the same foreign point (*e.g.*, by providing separate statistics for traffic that terminates in different regions of a foreign point). Do not provide data for foreign points listed in Table 3 not served during the reporting period. Leave such rows blank on Schedules 1 and 3.

#### 1. Identification of Foreign Points for ICS Reporting

- 97. For reporting on Schedule 1, the U.S. International Service Provider shall report statistics (minutes, customer revenue, and settlement payouts) for all U.S.-Billed Facilities ICS calls by the foreign point to which it agreed to provide ICS to the U.S.-billed party, rather than by an intermediate foreign point through which it arranges reorigination or transit of the ICS call. Classify payments made to a service provider in an intermediate point for reorigination or transit as settlement payouts and report these amounts on Schedule 1 by the destination foreign point, not the intermediate foreign point.
- 98. For Foreign-Billed ICS calls, a U.S. International Service Provider will know the foreign point for which it has agreed to provide call completion services to the United States, but not necessarily the ultimate foreign point in which the ICS customer is billed. For reporting on Schedule 1, the U.S. International Service Provider shall report statistics (minutes and settlement receipts) for all Foreign-Billed ICS calls by the foreign point for which it has agreed to provide International Call Completion Service to the United States.
- 99. Neither ICS Resale nor Traditional Transiting ICS is reported by foreign point. Data for these categories are provided on a world-total basis only, on Schedule 2.

<sup>&</sup>lt;sup>53</sup> *International Points* is available on the FCC's website at <a href="http://www.fcc.gov/wcb/iatd/intl.html">http://www.fcc.gov/wcb/iatd/intl.html</a> or <a href="http://www.fcc.gov/ib/sand/mniab/traffic/">http://www.fcc.gov/ib/sand/mniab/traffic/</a>.

# 2. Identification of Foreign Points for International Private Line Service

100. The level of geographical aggregation for data to be reported for International Private Line Service depends on whether the service is provided over a Facilities Circuit or a Resold Circuit. A Facilities Circuit refers to a circuit that a U.S. International Carrier obtains through ownership or a non-common carrier lease. A Resold Circuit refers to a circuit that a U.S. International Carrier obtains as a lease on a common carrier basis. U.S. International Carriers shall report service data for International Private Line Service that is provided over Facilities Circuits on Schedule 3 by foreign point. A description of how to assign International Private Line Service by foreign point in cases in which service is provided to more than one foreign point is provided in paragraph 132. Report International Private Line Service that is provided over Resold Circuits on Schedule 3 on a world-total basis.

# D. International Service Data – Technical Descriptions and Additional Filing Requirements

101. A general description of international service data to be filed is contained in section III-B ("Reporting of International Telecommunications Service and International VoIP Service Connected to the PSTN"). This section supplements section III-B with technical descriptions of the international service data to be filed and includes additional filing requirements.

#### 1. Customer Revenue

#### a. General Matters

- 102. Customer revenue refers to revenue billed for the provision of U.S.-Billed Facilities ICS, ICS Resale, Traditional Transiting ICS, International Private Line Service, and International Miscellaneous Services, including revenues derived from the connection, activation, provision, and termination of such services, unadjusted for uncollectibles. U.S. International Service Providers must report customer revenue for the various international services that they provided during the reporting period, as indicated on Schedules 1 through 4 of the Traffic and Revenue Report. They must report customer revenue on an accrual basis of accounting rather than a cash basis, as explained in paragraph 22 above. In addition, they must follow certain other guidelines in reporting customer revenue.
  - 103. Do not reduce customer revenue to reflect settlement payouts.
- 104. Include in customer revenue any surcharges on international services recorded as revenue in the company books of account, including all surcharges associated with the termination of ICS calls on foreign mobile networks ("mobile surcharges").
- 105. Exclude from customer revenue any surcharges on international services that are not recorded as revenue in the company books of account. Where a U.S. International Service Provider includes a charge on a customer bill that is recorded on its books as revenues and that it represents as being for the purpose of recovering or collecting contributions to federal or state universal service support mechanisms, it shall report such amounts in its section 43.62 reports as customer revenue. Also, it must include in customer revenue any surcharges that it books as revenue but remits to a non-government third party under contract.
- 106. Reflect in customer revenue all discounts that a U.S. International Service Provider extends to customers, including any discounts that are calculated after individual calls, facilities, or services are rated, *e.g.*, discounts that are calculated based on the total amount of billed services or the total amount of billed international services.
- 107. Do not treat as revenue reductions the costs of promotional items, such as telephone sets, frequent flyer miles, or merchandise credit. They are marketing expenses. The only

exception is where a U.S. International Service Provider issues credits or coupons for the purchase of future telecommunications services as a promotional item. In such a case, the U.S. International Service Provider must recognize an adjustment to revenue, the value of which is based on actuarial predictions of actual customer use of the credits, at the time it issues the coupon or credit.

#### b. Allocation Procedures for Customer Revenue

108. In some cases, a U.S. International Service Provider may not be able to directly identify customer revenue associated with reportable section 43.62 services, as required on schedules 1 through 4, or with individual foreign points, as required on schedules 1 and 3. For example, a U.S. International Service Provider may charge a monthly fee for a combined domestic and international calling plan<sup>54</sup> or for an international calling plan to multiple foreign points. Customer revenue that is associated with reportable section 43.62 services or with individual foreign points but that cannot be directly identified is termed Non-Route-Specific Revenue. All Non-Route-Specific Revenue for U.S.-Billed Facilities ICS shall be fully allocated among the foreign points listed in Schedule 1, as described below.

109. In all cases in which customer revenue cannot be directly identified, the U.S. International Service Provider shall make an allocation to customer revenue based on costcausation principles or, if that is not possible, by other reasonable allocation methods, such as the application of allocation factors based on proportional revenue or usage. For example, if a U.S. International Service Provider charges a monthly fee for a combined domestic and international calling plan, it could allocate a portion of the monthly fee to ICS customer revenue based on the difference between the monthly fee for the combined plan and the monthly fee for a comparable calling plan that is limited to domestic calling, if such a comparable plan were available to customers (cost-causation). If a comparable domestic-only plan were not available, it could allocate a portion of the monthly fee to ICS customer revenue by multiplying the monthly fee by the ratio of directly identifiable international charges billed under the calling plan to the total directly identifiable charges billed under the calling plan; or by the ratio of international minutes used under the plan to the total minutes used under the plan (proportional revenue or usage). Using the same allocation principles, it could further allocate the monthly fee allocated to ICS customer revenue between Facilities ICS and ICS Resale and, for Facilities ICS, among the foreign points.

110. In allocating customer revenue, comply with the standards of accuracy described in paragraph 23 above and fully document the allocations and their basis and maintain them for inspection, as described in paragraph 27.

111. Report on Schedule 2, Line 1.NR, the percentage of customer revenue for U.S.-Billed ICS that is Non-Route-Specific Revenue. If the percentage is zero, report zero on Line 1.NR. Include Non-Route-Specific Revenue for ICS Resale (*i.e.*, U.S.-Billed ICS terminated through resale arrangements) in the calculations, even though ICS Resale is not reported by foreign point under section 43.62 of the Commission's rules.

<sup>&</sup>lt;sup>54</sup> A calling plan refers to an arrangement under which a service provider offers its customers, in return for the payment of a monthly recurring charge, more favorable terms for making long-distance or international calls than are available on its standard rate schedule. Calling plans typically cover a one-month period and, once selected, are in effect indefinitely, so long as the customer continues to pay the recurring charges. Some international calling plans offer customers reduced per-minute calling rates to one or more foreign points. Other plans offer the customer a fixed number of minutes of international calling each month or an unlimited number of minutes of international calling in return for a fixed monthly charge. Some calling plans offer a mixture of domestic and international calling.

112. Where CMRS customers pay separately stated toll charges for ICS calls in addition to airtime and roaming charges, do not report airtime and roaming charges as part of customer revenues for ICS.

## 2. ICS Data to be Filed (Schedules 1 and 2)

#### a. Facilities ICS Minutes

113. U.S.-Billed Facilities ICS minutes reportable on Schedules 1 and 2 differ slightly. On Schedule 1, U.S. International Service Providers are required to report "U.S.-Billed Facilities ICS – Minutes Completed on Foreign Networks" (columns (b) through (d)). On Schedule 2, U.S. International Service Providers are required to report "Minutes" for "U.S.-Billed Facilities ICS – by Routing Arrangement" (Line 1.A) and include these amounts in "U.S.-Billed ICS – by Customer Category" (Lines 2.A through 2.D). U.S.-Billed Facilities ICS minutes reportable on Schedule 2 are minutes billed to customers, not minutes completed on foreign networks. Because of differences in unit billing increments, minutes completed on foreign networks may not exactly equal customer-billed minutes. Therefore, the amounts of U.S.-Billed Facilities ICS minutes reported on Schedule 1 may differ slightly from the amounts of Facilities ICS minutes reported on Schedule 2. In particular, "Total Minutes Completed on Foreign Networks – World Total" (Schedule 1, column d, bottom row) may differ slightly from "Total U.S.-Billed Facilities ICS" – "Minutes" (Schedule 2, Line 1.A).

114. In some cases, a U.S. International Service Provider may complete U.S.-Billed Facilities ICS calls on foreign networks free of charge or may provide call completion services for Foreign-Billed ICS calls free of charge. In such cases, include U.S.-Billed Facilities ICS minutes for calls completed free of charge in the amounts on Schedule 1 for minutes completed on foreign networks (columns (b) through (d)). Also, report U.S.-Billed Facilities ICS minutes for calls completed free of charge on a world-total basis as "Uncompensated Call Completion Services – U.S.-Billed Facilities ICS" on Schedule 1 (cell (j)). Include Foreign-Billed ICS minutes for calls completed free of charge in the amounts on Schedule 1 for Foreign-Billed ICS minutes (column (h)). Also, report Foreign-Billed ICS minutes for calls completed free of charge on a world-total basis as "Uncompensated Call Completion Services – Foreign-Billed ICS" on Schedule 1 (cell (k)).

#### b. U.S.-Billed ICS Revenues

115. The amount of customer revenue for "Total U.S.-Billed Facilities ICS" on Schedule 2 (Line 1.A) must match the amount of customer revenue for U.S.-Billed Facilities ICS (column (a)) for "World Total" on Schedule 1.

## (i) Identification of Facilities ICS and ICS Resale Revenue

116. If a U.S. International Service Provider provides ICS to a foreign point using a combination of Facilities ICS and ICS Resale, it may be unable to identify customer revenue, which is derived from customer billing records, as either Facilities ICS or ICS Resale, which are routing arrangements. In such a case, allocate customer revenue for each foreign point between Facilities ICS and ICS Resale based on the relative proportion of minutes completed to the foreign point under each routing arrangement.<sup>55</sup>

<sup>&</sup>lt;sup>55</sup> For Facilities ICS routing arrangements to each foreign point, service providers should use "Total Minutes Completed on Foreign Networks" (column (d)) on Schedule 1. For ICS Resale routing arrangements to each foreign point, service providers should use their own internal records. (Minutes terminated to individual foreign points under ICS Resale routing arrangements are not reportable items under section 43.62 and do not appear on any section 43.62 schedule.)

## (ii) Prepaid Calling Card Services

117. A prepaid calling card service is a card, device, or arrangement that provides consumers the ability to place long-distance calls without presubscribing to an interexchange carrier or using a credit card by allowing users to pay in advance for a specified amount of calling. <sup>56</sup> In order to ensure that unused or forfeited balances on prepaid calling card services are reflected in the calculation of customer revenue, prepaid calling card service providers <sup>57</sup> of ICS shall calculate customer revenue from prepaid calling card services by applying an adjustment factor to revenue from prepaid calling card services provided during the reporting period. They must calculate the adjustment factor by dividing total revenue from the sale of prepaid calling card services provided during the reporting period by the total revenue billed for prepaid calling card services provided during the reporting period. They must treat the amount of the adjustment as Non-Route-Specific Revenue and fully allocate it among the foreign points listed in Schedule 1.

# c. Disaggregation of ICS Minutes and Revenues by Customer Category

118. On Schedule 2, U.S. International Service Providers providing U.S.-Billed ICS shall disaggregate U.S.-Billed ICS minutes and revenues by the following categories of customers: residential and mass market customers (Line 2.A); business and government customers (Line 2.B); U.S. resellers (Line 2.C); and Reoriginated Foreign Traffic (Line 2.D). Report on Line 2.T the total minutes and revenues for all categories of customers (Lines 2.A + 2.B + 2.C + 2.D).

119. To the extent that a U.S. International Service Provider treats small businesses or other non-residential entities as residential customers (*e.g.*, by charging them the same rates for service as residential customers), or finds it difficult to distinguish them from residential customers, it may include them in the category "residential and mass market customers" for the purpose of this disaggregation. The term "business and government customers" refers to all customers that are not residential and mass market customers and are not service providers.

120. A U.S. International Service Provider providing Facilities ICS to other U.S. International Service Providers for resale shall include data for such service in statistics for Facilities ICS in Schedules 1 and 2. On Schedule 2, a U.S. International Service Provider providing Facilities ICS to other U.S. International Service Providers for resale shall include data for such service in "Total U.S.-Billed Facilities ICS" (Line 1.A) and "U.S. Resellers" (Line 2.C).

121. Note that minutes and revenues for "Total U.S.-Billed ICS – By Routing Arrangement" (Line 1.T on Schedule 2) must equal minutes and revenues, respectively, for "Total U.S.-Billed ICS – By Customer Category" (Line 2.T on Schedule 2).

<sup>&</sup>lt;sup>56</sup> Additional features, functions, or capabilities available in conjunction with the calling card service are not included in the definition of prepaid calling card service.

<sup>&</sup>lt;sup>57</sup> A prepaid calling card service provider refers to any person or entity that provides telecommunications service to consumers through the use of a prepaid calling card service. The prepaid calling card service provider is the entity that manages the personal identification numbers (PINs) and controls the number of minutes for which the service can be used. The Form 499-A Instructions define a prepaid calling card service provider as providing "prepaid calling card services by selling prepaid calling cards to the public, to distributors or to retailers. Prepaid calling card providers provide consumers the ability to place long-distance calls without presubscribing to an interexchange carrier or using a credit card. Prepaid calling card providers typically resell the toll service of other carriers and determine the price of the service by setting the price of the card, assigning personal identification numbers (PINs) and controlling the number of minutes that the card can be used for." *See Telecommunications Reporting Worksheet*, FCC Form 499-A, p. 14, at http://www.fcc.gov/Forms/Form499-A/499a-2010.pdf.

## d. Reporting of Settlement Payouts and Receipts

- 122. A settlement payout is the expense (including any transiting fees) that a U.S. International Service Provider incurs for International Call Completion Service to a foreign point obtained from a Foreign Service Provider. A settlement receipt is the revenue that a U.S. International Service Provider bills for International Call Completion Service to the United States provided to a Foreign Service Provider.
- 123. In reporting settlement payouts or settlement receipts, do not net expenses incurred for call completion services against revenue billed for call completion services, even if payments to or from foreign correspondents for call completion services are made based on a netting of these amounts.
- 124. Settlement agreements may be denominated in dollars, foreign currency units, or other monetary measures. For section 43.62 reporting purposes, however, U.S. International Service Providers must state settlement payouts and settlement receipts on Schedule 1 in U.S. dollars, regardless of the terms of the settlement agreements or industry practices. In making such conversions, they must apply the currency conversion rates that prevailed at the time of settlement with their foreign correspondents.
- 125. Include as settlement payouts any fees, taxes, or other charges (including any surcharges associated with the completion of calls on foreign mobile networks) incurred for International Call Completion Service to a foreign point provided by a Foreign Service Provider.
- 126. Do not include as settlement payouts the cost of any international or foreign facilities owned or leased to facilitate call completion of ICS traffic.

#### 3. International Private Line Service Data to be Filed (Schedule 3)

127. U.S. International Carriers providing International Private Line Service must report customer revenue and circuit data for the U.S. end of all International Private Line Service provided during the reporting period, as indicated on Schedule 3.

# a. Reporting of International Private Line Service by 64 kilobits per second Equivalent Circuits

- 128. U.S. International Carriers must report the total capacity of the circuits used for International Private Line Service that they provided to customers on December 31 of the reporting period. Report the total capacity as the number of 64 kilobits per second (kbps) circuits that are equivalent to the total capacity of the circuits used to provide service. Do not report the number of leases, contracts or actual number of lines. Also, do not attempt to convert part-day leases into equivalent full-day circuits, but report a circuit leased by a customer for specific hours on December 31 as a single circuit.
- 129. U.S. International Carriers shall calculate the number of equivalent 64 kbps circuits for each foreign point by converting the total bandwidth of circuits it had leased to customers for each foreign point using a conversion factor for the facility transmission standard associated with each circuit. The conversion factor for various facility transmission standards is based on 64 kbps for one voice-equivalent channel and is listed below in **Figure 3**. Assign equivalent 64 kbps circuits for International Private Line Service connecting a U.S. point to several foreign points, *e.g.*, over an international data network, to each foreign point based on the proportion of equivalent 64 kbps circuit connection points in each of the foreign points.

	Figure 3	
64 Kbps	Conversion	<b>Table</b>

Facility Transmission Standard	64 Kbps equivalents
Voice Grade or DS0	1
T1 or DS1	24
E1	30
DS3	630
18 MHz	315
24 MHz	420
36 MHz	630
OC-1	630
OC-3	1,890
OC-12	7,560
OC-24	15,120
OC-48	30,240
OC-192	120,960
STM -1	1,890
STM-4	7,560
STM-16	30,240
1 Gbps	12,096
2.5 Gbps	30,240
5 Gbps	60,480
10 Gbps	120,960

### b. Reporting of International Private Line Service Revenues

130. For International Private Line Service provided under a joint operating agreement with a Foreign Carrier, U.S. International Carriers shall report as customer revenue the amount of billed revenue associated with the U.S. half of International Private Line Service, including any revenue billed by a Foreign Carrier on behalf of the U.S. International Carrier (*e.g.*, if the customer is located in a foreign point). Do not include in revenues for International Private Line Service any billings made on behalf of Foreign Carriers for service associated with the foreign half of the International Private Line Service. In cases where a U.S. International Carrier provides an International Private Line Service over a wholly owned or leased circuit, it shall report one-half of the revenue associated with the international portion of the International Private Line Service as customer revenue.

- 131. Carriers shall exclude revenue associated with the U.S. local access and long-distance portion of International Private Line Service, regardless of whether these services are provided by it or another carrier, or billed by it on behalf of another carrier.
- 132. Report as revenue the total revenues for International Private Line Service rendered during the preceding calendar year, even if no lease was in effect at the end of the year and the circuit was not included in the December 31 line count. Where lease or billing periods overlap the calendar year, apportion the billed amounts between years based on the number of days of service in each year. Assign revenue for International Private Line Service connecting a U.S. point to several foreign points, *e.g.*, over an international data network, to each of the foreign

points based on the relative proportion of equivalent 64 kbps circuit connection points in each of the foreign points.

## 4. International Miscellaneous Services Data to be Filed (Schedule 4)

133. On Schedule 4, U.S. International Carriers shall report the name of each International Miscellaneous Service with customer revenue of at least \$5 million that they provided during the reporting period, describe each service, and report the world-total customer revenue for each service. As released with this Filing Manual, Schedule 4 is formatted to accept filing information for six separate International Miscellaneous Services. U.S. International Carriers with additional International Miscellaneous Services shall report the required information for each additional service using the same format as Schedule 4.

#### IV. ANNUAL CIRCUIT CAPACITY REPORT

134. Section 43.62 of the Commission's rules requires common carriers, non-common carrier satellite licensees, and submarine cable landing licensees to file certain information about international circuits that they own or, in some cases, lease.<sup>58</sup> There are separate filing requirements for:

- International terrestrial and satellite circuits.
- International submarine cable capacity cable operators.
- International submarine cable capacity capacity holders.

Each Filing Entity must file the required circuit data as indicated on the Circuit Capacity Report.

### A. Circuit Capacity Report – International Terrestrial and Satellite Circuits

135. Each facilities-based common carrier shall report a world-total count of active (used or leased) international bearer circuits as of December 31 of the reporting period in any terrestrial or satellite transmission facility for the provision of service to an end-user or resale carrier, which includes active circuits to itself or to its affiliates. A facilities-based common carrier is defined as a common carrier that holds an ownership, indefeasible-right-of-user, or leasehold interest in bare capacity in the U.S. end of an international facility regardless of whether the underlying facility is a common carrier or non-common carrier facility. The world-total count shall be provided separately for terrestrial and satellite transmission facilities. In addition, non-common carrier satellite operators shall report a world-total count of circuits sold or leased to any customer as of December 31 of the reporting period, including themselves or their affiliates, other than an international common carrier authorized by the Commission to provide U.S. international common carrier services. "Active circuits" for these purposes include backup and redundant circuits. Whether circuits are used specifically for voice or data is not relevant in determining that they are active circuits. All circuits are to be reported as 64 kbps equivalent circuits, as described in **Figure 3** of the Filing Manual.

<sup>&</sup>lt;sup>58</sup> 47 C.F.R. § 43.62(a).

<sup>&</sup>lt;sup>59</sup> 47 C.F.R. § 43.62(a)(1). See also 47 C.F.R. § 1.1156(b).

<sup>&</sup>lt;sup>60</sup> 47 C.F.R. § 63.09(a).

### B. Circuit Capacity Report – International Submarine Cable Capacity

### 1. Cable Operators

136. Licensees<sup>61</sup> of a submarine cable extending between the United States and a foreign point<sup>62</sup> as of December 31 of the reporting period shall report the available capacity and planned capacity of the cable, except as noted below.<sup>63</sup> Available capacity is all of the capacity currently available on the cable using equipment currently used on the cable, where "currently" means December 31 of the reporting period. Planned capacity is the entire intended capacity of the cable two years out from the reporting date (December 31 of the reporting period plus two years) based on the plans for upgrades to the technology used on the cable. The available capacity shall be reported in column (a) of the Circuit Capacity Report – International Submarine Cable Capacity – Cable Operators and the planned capacity shall be reported in column (b). The capacity data shall be reported in Gbps rounded to one decimal place.

137. Where there are multiple licensees for a cable, only one cable landing licensee may file the capacity data for that cable. The licensees shall determine which licensee will file the capacity data for that submarine cable. For simplicity, the licensee that files data on available and planned capacity is identified as the "Cable Operator" in the Circuit Capacity Report – International Submarine Cable Capacity – Cable Operators, although the reporting licensee need not be the actual cable operator.

#### 2. Capacity Holders

138. Each cable landing licensee and common carrier that holds capacity on the U.S. end of a submarine cable extending between the United States and a foreign point as of December 31 of the reporting period ("capacity holders") shall report its available capacity on the U.S. end of every submarine cable between the United States and any foreign point on which it holds capacity as of that date. A holding of capacity is an interest in the U.S. end of an international submarine cable through cable ownership, an indefeasible right of use (IRU), or an inter-carrier lease (ICL). For section 43.62 reporting purposes, an ICL is a lease of bare capacity between one capacity holder and another. Each capacity holder shall calculate its available capacity as the sum of (1) cable ownership; (2) the net of IRUs leased from other capacity holders less IRUs leased to other capacity holders; and (3) the net of ICLs leased from other capacity holders less ICLs leased to other capacity holders. Capacity holders shall report cable ownership in column (a); net IRUs in column (b); net ICLs in column (c); and the sum of columns (a) through (c) as net capacity held, in column (d) of the Circuit Capacity Report – International Submarine Cable Capacity – Capacity Holders. All capacity data shall be reported in STM-1 (Synchronous Transport Module

<sup>&</sup>lt;sup>61</sup> The following entities are required to be licensees on a cable landing license: (1) any entity that owns or controls a cable landing station in the United States; and (2) all other entities owning or controlling a five percent (5%) or greater interest in the cable system and using the U.S. points of the cable system. 47 C.F.R. § 1.767(h).

<sup>&</sup>lt;sup>62</sup> The international submarine cables subject to this requirement are those that connect the United States with foreign points. Capacity on domestic submarine cables – submarine cables that only connect points within the United States, such as cable connecting the Hawaiian Islands or Alaska to the conterminous United States – does not need to be reported. *Second Report and Order*, 28 FCC Rcd at 604-605, ¶ 100 n.173.

<sup>&</sup>lt;sup>63</sup> 47 C.F.R. § 43.62(a)(2)(i).

<sup>&</sup>lt;sup>64</sup> 47 C.F.R. § 43.62(a)(2)(ii).

level-1)<sup>65</sup> units, the standard commercial unit for the sale and leasing of capacity, rounded to one decimal place.

139. Capacity holders shall also categorize net capacity held, *i.e.*, column (d), on each cable as either activated or non-activated capacity. Activated capacity consists of capacity used for providing services or facilities to customers (on either a common carrier or non-common carrier basis);<sup>66</sup> capacity reserved for internal company use; capacity reserved for restoration services; and unused capacity that is available for immediate use. Non-activated capacity is unused capacity that is not available for immediate use. Capacity holders shall report activated capacity in column (e) and non-activated capacity in column (f).

<sup>&</sup>lt;sup>65</sup> The STM-1 (Synchronous Transport Module level-1) is the Synchronous Digital Hierarchy (SDH) ITU Telecommunication Standardization Sector (ITU-T) fiber optic network transmission standard, which has a bit rate of 155.52 Mbps.

<sup>&</sup>lt;sup>66</sup> Capacity used for customers includes capacity used for ICS, international private lines, Internet service provider and Internet backbone services, and other data or high-speed services.

## **Appendix A: Section 43.62 Rules**

# § 43.62 Reporting requirements for holders of international Section 214 authorizations and providers of international services.

- (a) Circuit Capacity Reports. Not later than March 31 of each year:
- (1) Satellite and Terrestrial Circuits. Each facilities-based common carrier shall file a report showing its active common carrier circuits between the United States and any foreign point as of December 31 of the preceding calendar year in any terrestrial or satellite facility for the provision of service to an end user or resale carrier, which includes active circuits used by themselves or their affiliates. Each non-common carrier satellite licensee shall file a report showing its active circuits between the United States and any foreign point as of December 31 of the preceding calendar sold or leased to any customer, including themselves or their affiliates, other than a carrier authorized by the Commission to provide U.S. international common carrier services.
- (2) International Submarine Cable Capacity.
- (i) The licensee(s) of a submarine cable between the United States and any foreign point shall file a report showing the capacity of the submarine cable as of December 31 of the preceding calendar year. The licensee(s) shall also file a report showing the planned capacity of the submarine cable (the intended capacity of the submarine cable two years from December 31 of the preceding calendar year). Only one cable landing licensee shall file the capacity data for each submarine cable. For cables with more than one licensee, the licensees shall determine which licensee will file the reports.
- (ii) Each cable landing licensee and common carrier shall file a report showing its capacity on submarine cables between the United States and any foreign point as of December 31 of the preceding calendar year.
- (b) Traffic and revenue reports.
- (1) Not later than July 31 of each year, each person or entity that holds an authorization pursuant to section 214 to provide international telecommunications service shall report whether it provided international telecommunications services during the preceding calendar year.
- (2) Not later than July 31 of each year, each common carrier engaged in providing international telecommunications service, and each person or entity engaged in providing Voice over Internet Protocol service connected to the public switched telephone network, between the United States and any foreign point shall file a report with the Commission showing revenues, payouts, and traffic for such international telecommunications service and Voice over Internet Protocol service connected to the public switched telephone network provided during the preceding calendar year.
- (3) Entities filing such reports shall submit a revised report by October 31 identifying and correcting any inaccuracies included in the annual report exceeding one percent of the reported figure.

NOTE TO PARAGRAPHS (a) and (b): United States is defined in section 3 of the Communications Act of 1934, as amended, 47 U.S.C. 153.

- (c) (1) A Registration Form, containing information about the filer, such as address, phone number, email address, etc., shall be filed with each report filed pursuant to paragraphs (a) and (b).
- (2) The Registration Form shall include a certification enabling the filer to check a box to indicate that the filer requests that its circuit capacity data or traffic and revenue data be treated as confidential. If a filer checks that box, the Commission shall treat the data contained in the accompanying report as confidential. Upon receipt of a request for inspection of such information, the Commission shall notify the filer; at that point, the filer must justify continued confidentiality of the information consistent with section 0.459(b) of the Commission's rules.
- (d) Filing Manual. Authority is delegated to the Chief, International Bureau to prepare instructions and reporting requirements for the filing of these reports prepared and published as a Filing Manual. The information required under this section shall be furnished in conformance with the instructions and reporting requirements in the Filing Manual.

NOTE TO PARAGRAPH (d): The instructions and reporting requirements prepared by the Chief, International Bureau, shall be consistent with the terms of *Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission's Rules*, IB Docket No. 04-112, Second Report and Order, FCC 13-6 (rel. January 15, 2013).

#### **Appendix B: Definitions**

**Capacity Holder** refers to a cable landing licensee or common carrier that holds capacity on the U.S. end of an international submarine cable as of December 31 of the reporting period. A holding of capacity is an interest in the U.S. end of an international submarine cable through cable ownership, an indefeasible right of use (IRU), or an inter-carrier lease (ICL).

**Circuit** refers to a path for electromagnetic transmission of information between two or more points, including transmission by submarine or terrestrial cable, satellite, wire, or radio. In addition to a dedicated channel, a service guarantee for electromagnetic transmission of information between two or more points at an agreed-upon data speed is considered a circuit for reporting International Private Line Service under section 43.62 of the Commission's rules.

**Country-Beyond Service** is ICS provided and billed by a U.S. International Service Provider to a customer located in a foreign point in which case the customer, using a credit card or calling card issued by the U.S. International Service Provider, calls a telephone number in another foreign point.

**Country-Direct Service** is ICS provided by a U.S. International Service Provider to a customer located in a foreign point in which case the customer, using a credit card or calling card issued by the U.S. International Service Provider, calls a telephone number in the United States.

**Customer Revenue** refers to revenue billed for the provision of U.S.-Billed Facilities ICS, ICS Resale, Traditional Transiting ICS, International Private Line Service, and International Miscellaneous Services, including revenues derived from the connection, activation, provision, and termination of such services, unadjusted for uncollectibles.

End-User refers to a calling party or called party.

**Facilities ICS** refers to the provision of ICS through a commercial arrangement between a U.S. International Service Provider and a Foreign Service Provider (including a foreign affiliate of the U.S. International Service Provider) for International Call Completion Service.

**Facilities-Based Common Carrier** refers to a common carrier that holds an ownership, indefeasible-right-of-user, or leasehold interest in bare capacity in the U.S. end of an international facility, regardless of whether the underlying facility is a common carrier or non-common carrier facility. 47 C.F.R. § 63.09 (a).

**Filing Entity** refers to a person or entity that is required to file information with the FCC pursuant to section 43.62 of the Commission's rules, 47 C.F.R. § 43.62.

**Foreign-Billed ICS** refers to International Calling Service (ICS) that originates or terminates with an end-user in the United States, and that is billed by a Foreign Service Provider.

**Foreign Carrier** refers to any entity that is authorized within a foreign country to engage in the provision of international telecommunications services offered to the public in that country within the meaning of the International Telecommunication Regulations, see Final Acts of the World Administrative Telegraph and Telephone Conference, Melbourne, 1988 (WATTC-88), Art. 1, which includes entities authorized to engage in the provision of domestic telecommunications services if such carriers have the ability to originate or terminate telecommunications services to

or from points outside their country. 47 C.F.R. § 63.09 (a). The term "Foreign Carrier" does not refer to the nationality of the employees or owners of a communications entity. An affiliate of a Foreign Carrier that operates in the United States as a common carrier is a U.S. Carrier.

Foreign Point refers to a foreign country or other geographic location outside the United States.

**Foreign Service Provider** refers to a Foreign Carrier; or any person or entity in a foreign point that provides VoIP service connected to the PSTN in a foreign point or between a foreign point and the United States; or any person or entity in a foreign point that provides International Call Completion Service to a U.S. International Service Provider or obtains International Call Completion Service from a U.S. International Service Provider.

ICS. See "International Calling Service."

**ICS Resale** refers to the provision of U.S.-Billed ICS by a U.S. International Service Provider through the resale of ICS purchased from another U.S. International Service Provider.

IMTS. See "International Message Telephone Service."

**Inter-Carrier Lease (ICL)**, for section 43.62 reporting purposes, refers to a lease of bare capacity between one capacity holder and another.

**Interconnected VoIP Service** refers to a service that: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user's location; (3) requires Internet Protocol-compatible customer premise equipment; and (4) permits users generally to receive calls that originate on the public switched telephone network (PSTN) and to terminate calls to the PSTN. 47 C.F.R. § 9.3.

**International Call Completion Service** refers to a service provided through commercial arrangement between two service providers in which a service provider in Country A pays another service provider to complete an International Calling Service (ICS) call to an end-user in Country B. The service provider selling the service may be in Country A, Country B, or another Country C. In some instances, International Call Completion Service may be provided or obtained free of charge.

**International Calling Service (ICS)** refers to International Message Telephone Service (IMTS) and International VoIP Service Connected to the PSTN, including International Call Completion Service for IMTS or International VoIP Service Connected to the PSTN.

**International Message Telephone Service (IMTS)** refers to the provision of message telephone service (MTS) between the United States and a foreign point. The term "message telephone service" refers to the transmission and reception of speech and low-speed dial-up data over the public switched telephone network (PSTN). For section 43.62 reporting purposes, IMTS includes international services with dedicated access if the calls are routed through the PSTN in the United States or a foreign point. International Call Completion Service for IMTS is included within the definition of IMTS.

**International Miscellaneous Service** refers to any International Telecommunications Service other than ICS and International Private Line Service.

**International Private Line Service** refers to private line service between the United States and a

foreign point. Private line service refers to making available to a customer on a common carrier basis a circuit for a specified period of time for the customer's exclusive use.

**International Telecommunications Service** refers to telecommunications service between the United States and a foreign point. Section 3(46) of the Communications Act of 1934, as amended, 47 U.S.C. § 153(46), defines telecommunications service as "the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used" (*i.e.*, the provision of telecommunications on a common carriage basis).

International VoIP Service Connected to the PSTN refers to service between the United States and any foreign point that: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user's location; (3) requires Internet Protocol-compatible customer premise equipment; and (4) permits users generally to receive calls that originate on the public switched telephone network (PSTN) or to terminate calls to the PSTN. International VoIP Service Connected to the PSTN consists of Interconnected VoIP Service and "one-way" VoIP services, between the United States and any foreign point. (One-way VoIP services enable users to terminate calls to the PSTN but do not permit users to receive calls that originate on the PSTN, or enable users to receive calls from the PSTN but do not permit the user to make calls terminating to the PSTN.) International Call Completion Service for International VoIP Service Connected to the PSTN is included within the definition of International VoIP Service Connected to the PSTN.

IRU. See "Indefeasible Right of Use."

**Indefeasible Right of Use (IRU)** refers to an indefeasible right to use facilities for a certain period of time that is commensurate with the remaining useful life of the asset and that confers on the grantee the vestiges of ownership.

**Non-Route-Specific Revenue** refers to customer revenue that is associated with reportable section 43.62 services or with individual foreign points but that cannot be directly identified.

**Reoriginated Foreign ICS** refers to ICS traffic from a foreign point that is transmitted to the United States for retransmission to a destination foreign point, but that is not handled as Traditional Transiting ICS.

**Settlement Payout** refers to the expense (including any transiting fees) that a U.S. International Service Provider incurs for International Call Completion Service to a foreign point obtained from a Foreign Service Provider.

**Settlement Receipt** refers to the revenue that a U.S. International Service Provider bills for International Call Completion Service to the United States provided to a Foreign Service Provider.

**Spot Market** refers to a market where service providers can buy or sell call completion services for immediate delivery.

**Spot Market Customer** refers to a service provider that enters into a contract to buy or sell call completion services by interconnecting at a spot market point of presence.

**Spot Market Owner** refers to a person or entity that facilitates the transaction between Spot Market Customers (who may not know each other's identity) by physically interconnecting the

customers and acting as their commercial intermediary.

**Traditional Transiting ICS** refers to ICS from a foreign point that (a) transits the United States prior to completion at a foreign point and (b) is settled at a rate agreed upon by the Foreign Service Provider in the origination foreign point and the Foreign Service Provider in the destination foreign point. The U.S. International Service Provider that provides the transiting service is reimbursed for its handling and transmission of the traffic by the Foreign Service Provider in the origination foreign point.

**United States** refers to the several States and Territories, the District of Columbia, and the possessions of the United States, but does not include the Canal Zone. 47 U.S.C. § 153.

- **U.S.-Billed Facilities ICS** refers to U.S.-Billed ICS that a U.S. International Service Provider provides as Facilities ICS.
- **U.S.-Billed ICS** refers to an ICS call that originates or terminates in the United States and that is billed by a U.S. International Service Provider to an end-user customer or to a U.S. International Service Provider that is taking the service for resale; or a Reoriginated Foreign ICS call that is billed by a U.S. International Service Provider to a Foreign Service Provider; or a country-beyond call.
- **U.S. Carrier** refers to a person or entity in the United States that provides telecommunications services (*i.e.*, telecommunications on a common carrier basis) in the United States or between the United States and a foreign point or holds a U.S. section 214 license to do so. The term "U.S. Carrier" does not refer to the nationality of the employees or owners of a communications entity. An affiliate of a U.S. Carrier that operates in a foreign point as a common carrier is a Foreign Carrier.
- **U.S. International Authorization Holder** refers to a person or entity that has received authorization from the FCC under section 214 of the Communications Act, 47 U.S.C. § 214, to provide International Telecommunications Service.
- **U.S. International Carrier** refers to a person or entity in the United States that provides International Telecommunications Service (*i.e.*, telecommunications on a common carrier basis between the United States and a foreign point) or holds a U.S. section 214 authorization to do so.
- **U.S. International Service Provider** refers to a U.S. International Carrier or a person or entity in the United States that provides VoIP service connected to the PSTN between the United States and any foreign point (International VoIP Service Connected to the PSTN). Included within the definition of a U.S. International Service Provider is any person or entity in the United States that provides International Call Completion Service to or from a foreign point for International Message Telephone Service or International VoIP Service Connected to the PSTN.

#### **Appendix C: Registration Form**

1	Filing Date:
2	Reporting Period: (enter calendar year)
3	Name and address of Filing Entity:
4	FCC Registration Number (FRN):
5	Filing Entity's Filer 499 ID, if any:
6	Preparer's name and contact Information
7	Check One:
	Traffic and Revenue Report?
	Circuit Capacity Report?
8	Check One:
	New Report?
	Revision to Existing Report?

9	International Section 214 Authorizations
	For first-time filers of the Traffic and Revenue Report or Circuit Capacity Report under section 43.62 of the Commission's rules, list all international section 214 authorizations:
	Initial List
	For subsequent filings, list all additions and deletions to international section 214 authorizations during the reporting period:
	Additions
	Deletions
10	Satellite Licenses
	For first-time filers of the Circuit Capacity Report under section 43.62 of the Commission's rules, list all satellite licenses.
	Initial List
	For subsequent filings, list all additions and deletions to satellite licenses during the reporting period.
	Additions
	Deletions

11	Submarine Cable Landing Licenses
	For first-time filers of the Circuit Capacity Report under section 43.62 of the Commission's rules, list all submarine cable landing licenses:
	Initial List
	For subsequent filings, list all additions and deletions to submarine cable landing licenses during the reporting period:
	Additions
	Deletions
12	Confidentiality
	I certify that the data contained in the accompanying report are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the information contained in the report pursuant to section 0.459 of the Commission's Rules.
	Check if applicable:
	Traffic and Revenue Report
	Circuit Capacity Report
	International Terrestrial & Satellite Circuits
	International Submarine Cable Capacity
	- Cable Operators
	International Submarine Cable Capacity - Capacity Holders

13	Certification
	I certify that I am an officer of the above-named filing entity, that I have examined the accompanying report and to the best of my knowledge, information, and belief, all statements of fact contained in the report

	reporting period indicated above.
14	Signature
15	Printed name of officer or company official
16	Title of the certifying official:
17	Physical address, telephone number, and e-mail address of the certifying official:
18	Filing Entity's official contact or attorney of record, including physical address, telephone number and e-mail address:

Appendix D: Traffic and Revenue Report (Services Checklist and Schedules 1-4)

#### **Services Checklist**

Nan	ne of Filing E	Entity:
Filir	ng Date:	
-	orting Perio er calendar year)	
Che	ck all of the	following boxes that apply for the reporting period:
1		Provided no International Telecommunications Service or International VoIP Service connected to the PSTN; If checked, do not file Schedules 1 through 4.
2		Provided <b>U.SBilled Facilities International Calling Services (ICS).</b> If checked, include Schedule 1 and Schedule 2.
3		Provided Foreign-Billed Facilities ICS.  If checked, include Schedule 1.
4		Provided <b>Traditional Transiting ICS</b> to foreign carriers. If checked, include Schedule 2.
5.T		Provided ICS Resale.
	5.A	Billed \$5,000,000 or more in revenue for such service.  If checked, include Schedule 2.
	5.B	Billed less than \$5,000,000 in revenue for such service.  If checked, and Items 2, 3, and 4 are <i>not</i> checked, do <i>not</i> include Schedule 2.  If checked, and one or more of Items 2, 3, and 4 are checked, include Schedule 2.
6		Provided International Private Line Service.  If checked, include Schedule 3.
7.T		Provided International Miscellaneous Services.
	7.A	Billed \$5,000,000 or more in revenue for at least one such service.  If checked, include Schedule 4 for each such service.
	7.B	Billed less than \$5,000,000 in revenue for each such service.  If checked, do not include Schedule 4.

# Traffic and Revenue Report Schedule 1 U.S.-Billed and Foreign-Billed Facilities ICS Traffic - By Foreign Point

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

						U.SBi	illed ICS			Foreign-	Billed ICS
Region Summary Code	Code	Foreign Point	Customer Revenue (a)	Minutes Completed on Foreign Fixed- Line Networks (b)	Minutes Completed on Foreign Mobile Networks (c)	Total Minutes Completed on Foreign Networks (d)		Settlement Payouts for Call Completion on Foreign Mobile Networks (f)	Total Settlement Payouts (g)	Minutes (h)	Settlement Receipts (i)
0		Algeria									
0	1	Angola									
0	1	Ascension Island									
0		Benin									
0		Botswana									
0		Burkina Faso									
0		Burundi									
0		Cameroon									
0		Canary Island									
0	1	Cabo Verde									
0		Central African Republic									
0		Chad									
0		Comoros									
0		Congo, Democratic Republic of the									
0		Congo, Republic of the									
0		Cote d'Ivoire									
0		Djibouti									
0		Egypt									
0		Equatorial Guinea									
0		Eritrea									
0		Ethiopia									
0		Gabon									
0		Gambia, The									
0		Ghana									
0		Guinea									
0		Guinea-Bissau									
0		Kenya									
0		Lesotho									
0		Liberia									
0	1	Libya									

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

						U.SBi	lled ICS			Foreign-l	Billed ICS
Region Summary	Region		Customer Revenue	Foreign Fixed- Line Networks	Minutes Completed on Foreign Mobile Networks	Total Minutes Completed on Foreign Networks	Line Networks	Foreign Mobile Networks	Payouts	Minutes	Settlement Receipts
Code	Code	Foreign Point	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
0	1	Madagascar									
0	1	Malawi									
0	1	Mali									
0	1	Mauritania									
0		Mauritius									
0	1	Mayotte									
0	1	Morocco									
0	1	Mozambique									
0		Namibia									
0	1	Niger									
0	1	Nigeria									
0	1	Reunion									
0	1	Rwanda									
0	1	Saint Helena									
0	1	Sao Tome and Principe									
0	1	Senegal									
0	1	Seychelles									
0	1	Sierra Leone									
0	1	Somalia									
0	1	South Africa									
0	1	South Sudan									
0	1	Sudan									
0	1	Swaziland									
0	1	Tanzania									
0	1	Togo									
0	1	Tunisia									
0	1	Uganda									
0	1	Western Sahara									
0	1	Zambia									
0	1	Zimbabwe									
1	1	Africa	0 00 00	-0 -0 -0		0.0 .0 .0			· · · · · · · · · · · · · · · · · · ·	100 1000	·: ·: ·:

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

						II.C. D	illed ICS			Eoroign	Billed ICS
				1		U.SB	IIIeu ICS	1		roieign-	
Region Summary	Region		Customer Revenue	Minutes Completed on Foreign Fixed- Line Networks	Minutes Completed on Foreign Mobile Networks	Total Minutes Completed on Foreign Networks		Settlement Payouts for Call Completion on Foreign Mobile Networks	Total Settlement Payouts	Minutes	Settlement Receipts
Code	Code	Foreign Point	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
0		Afghanistan	(6)	(2)	(0)	(5)	(0)	.,,	(9)	\	
0		Bangladesh									
0		Bhutan									
0		Brunei									
0		Burma									<del>                                     </del>
0		Cambodia									<del></del>
0		Chagos Archipelago									<del></del>
0		China									<del></del>
0		French Southern and Antarctic Lands									<del></del>
											<del></del>
0		Hong Kong									
0		India									
0		Indonesia									<b></b>
0		Japan									<b></b>
0		Kazakhstan									<b></b>
0		Korea, North									<b></b>
0		Korea, South									
0		Kyrgyzstan									
0		Laos									
0		Macau									<u> </u>
0		Malaysia									<u> </u>
0		Maldives									<u> </u>
0		Mongolia									<u> </u>
0		Nepal									
0		Pakistan									<u> </u>
0		Philippines							-		<u> </u>
0		Singapore									i
0	2	Sri Lanka							-		
0		Taiwan							_		
0		Tajikistan									
0		Thailand					İ				(
0		Timor-Leste					İ				(
0		Turkmenistan									ſ
0		Uzbekistan									
0		Vietnam									
1	2	Asia	0.000.00	30.000		100000			0.000		

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				U.SBilled ICS							
Region Summary Code	Region Code	Foreign Point	Customer Revenue (a)	Minutes Completed on Foreign Fixed- Line Networks (b)	Minutes Completed on Foreign Mobile Networks (c)	Total Minutes Completed on Foreign Networks (d)		Settlement Payouts for Call Completion on Foreign Mobile Networks (f)	Total Settlement Payouts (q)	Minutes (h)	Settlement Receipts (i)
0	3	Anguilla					1		****		
0	3	Antiqua and Barbuda									
0		Aruba									
0		Bahamas, The									
0		Barbados									
0		Bermuda									
0		Cayman Islands									
0		Cuba									
0		Curacao									
0		Dominica									
0		Dominican Republic									
0		French Antilles (except Guadeloupe)									
0		Grenada									
0		Guadeloupe									
0		Haiti									
0		Jamaica									
0		Montserrat									
0		Netherlands Caribbean Special Municipalities									
0		Saint Kitts and Nevis									
0		Saint Lucia									
0		Saint Vincent and the Grenadines									
0		Sint Maarten									
0		Trinidad and Tobago									
0		Turks and Caicos Islands									
0	3	Virgin Islands, British									
1	3	Caribbean	G = G = G					1 3 3			

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

			U.SBilled ICS								Foreign-Billed ICS	
Region Summary Code	Region Code	Foreign Point	Customer Revenue (a)		Minutes Completed on Foreign Mobile Networks (c)			Settlement Payouts for Call Completion on Foreign Mobile Networks (f)	Total Settlement Payouts (g)	Minutes (h)	Settlement Receipts (i)	
Oode		Albania	(a)	(D)	(6)	(u)	(6)	(I)	(9)	(11)	(1)	
0		Armenia										
0		Azerbaijan										
0		Belarus										
0		Bosnia and Herzegovina										
0		Bulgaria										
0		Croatia										
0	4	Czech Republic										
0	4	Estonia										
0	4	Georgia										
0		Hungary										
0	4	Kosovo										
0		Latvia										
0		Lithuania										
0		Macedonia										
0		Moldova										
0		Montenegro										
0		Poland										
0		Romania										
0	4	Russia										
0		Serbia										
0		Slovakia										
0		Slovenia										
0	4	Ukraine										
1	4	Eastern Europe							G = G = G	6.G. G.G.	50.0 50.0 5	

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

						U.SB	illed ICS			Foreign-	Billed ICS
Region Summary Code	Code	Foreign Point	Customer Revenue (a)	Minutes Completed on Foreign Fixed- Line Networks (b)	Minutes Completed on Foreign Mobile Networks (c)	Total Minutes Completed on Foreign Networks (d)		Settlement Payouts for Call Completion on Foreign Mobile Networks (f)	Total Settlement Payouts (g)	Minutes (h)	Settlement Receipts (i)
0	5	Bahrain									
0	5	Iran									
0	5	Iraq									
0		Israel									
0		Jordan									
0		Kuwait									
0		Lebanon									
0		Oman									
0		Palestinian Territories									
0		Qatar									
0		Saudi Arabia									
0		Syria									
0		United Arab Emirates									
0	5	Yemen									
1	5	Middle East				100000		: : :			
0		Belize									
0		Canada									
0		Costa Rica									
0		El Salvador									
0		Guatemala									
0		Honduras									
0		Mexico									
0		Nicaragua									
0		Panama									
0	6	Saint Pierre and Miquelon		********					**********		
1	6	North and Central America						: ::			

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				r	r	U.SB	illed ICS	r		Foreign-	Billed ICS
				Minutes	Minutes	Total Minutes	Settlement Payouts for Call	Settlement Payouts for Call			
Danina			0	Completed on	Completed on	Completed on	Completion on	Completion on	Total		0
Region	Danian		Customer	Foreign Fixed-	Foreign Mobile	Foreign		Foreign Mobile			Settlement
Summary	Code	Franks Briss	Revenue	Line Networks	Networks	Networks	Line Networks		Payouts	Minutes	Receipts
Code		Foreign Point	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
0		Australia									
0		Christmas Island									
0		Cook Islands									
0		Fiji									
0		French Polynesia									
0		Kiribati									
0		Marshall Islands									
0		Micronesia, Federated States of									
0		Nauru									
0		New Caledonia									
0		New Zealand									
0		Niue									
0		Norfolk Island									
0		Palau									
0		Papua New Guinea									
0		Pitcairn Island									
0		Samoa (Independent State of)									
0		Solomon Islands									
0		Tonga									
0		Tuvalu									
0		Vanuatu									
0	7	Wallis and Futuna									
1	7	Oceania	9 49 49 .	9 9 9	9.00	10 0 0	0.0		g = g - g	9	
0	8	Argentina									
0		Bolivia									
0		Brazil									
0		Chile									
0		Colombia									
0	8	Ecuador									
0		Falkland Islands (Islas Malvinas)									
0		French Guiana									
0		Guyana									
0		Paraguay									
0		Peru		İ	İ			İ			
0		Suriname		İ	İ			İ			
0		Uruquay		İ	İ			İ			
0		Venezuela		İ	İ			İ			
1	8	South America	* 10 to 10 to 1	100000000	70 (N (N (N (N )	* ( * . * ( * . * ) *	19 19	* 201* 201* 2	1000000	A (* ) (* (* )	10000

Name of Filing Entity:	
Filing Date:	
-	
Reporting Period:	

	1					U.SBi	lled ICS			Foreign-l	Billed ICS
Region Summary Code	Region Code	Foreign Point	Customer Revenue (a)		Minutes Completed on Foreign Mobile Networks (c)	Total Minutes Completed on Foreign Networks (d)		Settlement Payouts for Call Completion on Foreign Mobile Networks (f)	Total Settlement Payouts (g)	Minutes (h)	Settlement Receipts (i)
0	9	Andorra									• • •
0	9	Austria									
0	9	Belgium									
0	9	Cyprus									
0	9	Denmark									
0	9	Faroe Islands									
0	9	Finland									
0	9	France									
0	9	Germany									
0	9	Gibraltar									
0	9	Greece									
0	9	Greenland									
0		Holy See									
0	9	Iceland									
0	9	Ireland									
0		Italy									
0	9	Liechtenstein									
0		Luxembourg									
0		Malta									
0		Monaco									
0		Netherlands									
0		Norway									
0	9	Portugal							-		-
0	9	San Marino									
0	9	Spain									
0	9	emodeli									
0		Switzerland									
0	9	Turkey									
0	9	United Kingdom									
1	9	Western Europe		10 010 010		100 000 00		0.000	10 10 10	0.00	

Line Networks Networks

Networks

Line Networks

Networks

Foreign-Billed ICS

Minutes

Settlement

Receipts

(i)

Total

Settlement

Payouts

Name of Filing Er	tity:							
Filing Date:			]					
Reporting Period	:		]					
					U.SBi	lled ICS		
						Settlement Payouts for	Settlement Payouts for	ì
			Minutes Completed on	Minutes Completed on	Total Minutes Completed on	Call Completion on	Call Completion on	ı
Region		Customer		Foreign Mobile			Foreign Mobile	

ſ	Uncompensated Call Completion Services
	(j) U.SBilled Facilities ICS  - Minutes completed on foreign networks for which there is no settlement payout:
	(k) Foreign-Billed ICS - Minutes for which there is no settlement receipt:

Revenue

Summary

Code

Region Code

10 Antarctica

Foreign Point

10 International Mobile Satellite Systems
10 Other Regions
11 World Total

#### Schedule 2

#### World-Total Data for U.S.-Billed and Traditional Transiting ICS

Nam	e of Filin	g Entity:		
Filing	g Date:			
Repo	orting Pe	riod:		
			World-To	tals
			Minutes	Customer Revenue
1	U.SBill	ed ICS – By Routing Arrangement		
	1.A	Total U.SBilled Facilities ICS		
	1.B	Total ICS Resale		
	1.T	Total U.SBilled ICS [ = 1.A + 1.B ]		
	1.NR	Percentage of Customer Revenue in Line 1.T that is Non-Route-Specific Revenue		%
2	U.SBill	ed ICS – By Customer Category		
	2.A	Residential and Mass Market		
	2.B	Business and Government		
	2.C	U.S. Resellers		
	2.D	Reoriginated Foreign Traffic		
	2.T	Total U.SBilled ICS [ = 2.A + 2.B + 2.C + 2.D ]		
3	Traditio	nal Transiting ICS		
	3.T	Total		

Note: Entries on Line 1.T should equal entries on Line 2.T.

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				International Priv	ate Line Service	S	
1			Service Pro	ovided Over	Service Provided Over		
			Facilities	s Circuits	Resold	Circuits	
				64 Kbps		64 Kbps	
Region			Customer	Equivalent	Customer	Equivalent	
Summary	Region		Revenue	Circuits	Revenue	Circuits	
Code	Code	Foreign Point	(a)	(b)	(c)	(d)	
0	1	Algeria				:::::::::::::::::::::::::::::::::::::::	
0	1	Angola					
0	1	Ascension Island					
0	1	Benin					
0	1	Botswana				સાંસવાસા	
0	1	Burkina Faso					
0	1	Burundi					
0	1	Cameroon					
0	1	Canary Island					
0	1	Cabo Verde				સાંસવાસાં	
0	1	Central African Republic					
0	1	Chad					
0	1	Comoros					
0	1	Congo, Democratic Republic of the					
0	1	Congo, Republic of the					
0	1	Cote d'Ivoire					
0	1	Djibouti					
0	1	Egypt					
0	1	Equatorial Guinea					
0	1	Eritrea				સામાના	
0	1	Ethiopia			010101010101010	010101010101010	
0	1	Gabon					
0	1	Gambia, The					
0	1	Ghana					
0	1	Guinea			1444444	સ્વવવવવવ	
0	1	Guinea-Bissau				01010101010101	
0	1	Kenya					
0	1	Lesotho					
0	1	Liberia					
0	1	Libya					

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				nternational Priv	vate Line Service	es
			Service Pro	ovided Over	Service Pr	ovided Over
			Facilities	s Circuits	Resold	Circuits
				64 Kbps		64 Kbps
Region			Customer	Equivalent	Customer	Equivalent
Summary	Region		Revenue	Circuits	Revenue	Circuits
Code	Code	Foreign Point	(a)	(b)	(c)	(d)
0	1	Madagascar			0-0-0-0-0-0-0-0-0	
0	1	Malawi				
0	1	Mali				
0	1	Mauritania				
0	1	Mauritius			14040404040404	
0	1	Mayotte			14141444444	**********
0	1	Morocco				
0	1	Mozambique				
0		Namibia				
0	1	Niger				વેલવેલવેલવેલ
0	1	Nigeria			1444444	વવવવવવવ
0	1	Reunion				
0	1	Rwanda				
0	1	Saint Helena				
0	1	Sao Tome and Principe				
0	1	Senegal			1444444	વવવવવવવ
0	1	Seychelles				
0	1	Sierra Leone				
0	1	Somalia				
0	1	South Africa				
0	1	South Sudan			1444444	સ્વયવસ્થય
0	1	Sudan			050505050505050	
0	1	Swaziland				
0	1	Tanzania				
0	1	Togo				
0	1	Tunisia			1444444	3444444
0	1	Uganda			0505050505050	
0	1	Western Sahara				
0	1	Zambia				
0	1	Zimbabwe				
1	1	Africa			1 6 6 6 6 6	

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				International Priv	ate Line Service	es .
			Service Pro	ovided Over	Service Pro	ovided Over
				s Circuits	Resold	Circuits
				64 Kbps		64 Kbps
Region			Customer	Equivalent	Customer	Equivalent
Summary	Region		Revenue	Circuits	Revenue	Circuits
Code	Code	Foreign Point	(a)	(b)	(c)	(d)
0	2				0-	o fo fo fo fo fo fo fo
0	2	Bangladesh				
0	2	Bhutan				
0		Brunei				
0	2	Burma				સામાના
0	2				01010101010101010	010101010101010
0	2	Chagos Archipelago				
0	2					
0	2	French Southern and Antarctic Lands				
0		Hong Kong			કેલ લેવેલ લેવેલ	વલવલવલ
0	2	India			1444444	સવવવવવ
0	2	Indonesia				
0		Japan				
0	2	Kazakhstan				
0		Korea, North				
0	2	Korea, South			14444444	રવવવવવ
0	2	Kyrgyzstan			010101010101010	0101010101010
0		Laos				
0	2	Macau				
0		Malaysia				
0	2	Maldives				સંસ્થાસમાન
0		Mongolia			010101010101010	010101010101010
0		Nepal				
0		Pakistan				
0		Philippines				
0		Singapore				રહેવના હવાના
0		Sri Lanka			0101010101010101	010101010101010
0		Taiwan				
0		Tajikistan				
0	2	Thailand				
0	2					વાવાવાવા
0	2				(લેલેલેલેલેલે	લાલાલા
0	2	Uzbekistan			0 ( 0 ( 0 ( 0 ( 0 ( 0 ( 0 ( 0 ( 0 ( 0 (	0101010101010
0	2	Vietnam				
1	2	Asia				

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

			l	nternational Priv	ate Line Service	s	
				ovided Over		ovided Over	
				Circuits		d Circuits	
				64 Kbps		64 Kbps	
Region			Customer	Equivalent	Customer	Equivalent	
Summary	Region		Revenue	Circuits	Revenue	Circuits	
Code	Code	Foreign Point	(a)	(b)	(c)	(d)	
0	3	Anguilla		` '	sisisisisisisisi	0404040404040	
0	3	Antigua and Barbuda					
0	3	Aruba					
0	3	Bahamas, The					
0	3	Barbados			indananii	(444444)	
0	3	Bermuda				કેવવેલવેલવેલ	
0	3	Cayman Islands				0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {1 {0 {1 {0 {1 {0 {1 {0 {1 {0 {1 {0 {1 {0 {1 {0 {1 {0 {1 {0}}}}}}}} } } } } } } }}}}}}}}}}	
0	3	Cuba					
0	3	Curacao					
0	3	Dominica					
0	3	Dominican Republic				કેવવેલવેલવેલ	
0	3	French Antilles (except Guadeloupe)			0101010101010101	0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0	
0	3	Grenada					
0	3	Guadeloupe					
0	3	Haiti					
0	3	Jamaica				કેલ્લાના લેવના જ	
0	3	Montserrat			0101010101010101	0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0	
0	3	Netherlands Caribbean Special Municipalities					
0	3	Saint Kitts and Nevis					
0	3	Saint Lucia					
0		Saint Vincent and the Grenadines				(444444)	
0	3	Sint Maarten					
0	3	Trinidad and Tobago					
0	3	Turks and Caicos Islands					
0	3	Virgin Islands, British					
1	3	Caribbean					

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				International Private Line Services				
		Service Provided Over Service		Service Provided Over		ovided Over		
			Facilities	Facilities Circuits		Resold Circuits		
				64 Kbps		64 Kbps		
Region			Customer	Equivalent	Customer	Equivalent		
Summary	Region		Revenue	Circuits	Revenue	Circuits		
Code	Code	Foreign Point	(a)	(b)	(c)	(d)		
0	4	Albania				: 1: 1: 1: 1: 1: 1: 1: 1:		
0	4	Armenia						
0	4	Azerbaijan						
0	4	Belarus						
0	4	Bosnia and Herzegovina				Hiddild		
0	4	Bulgaria						
0	4	Croatia						
0	4	Czech Republic						
0	4	Estonia						
0	4	Georgia						
0	4	Hungary			(લવવવવવ	સિવવવવવ		
0	4	Kosovo						
0	4	Latvia						
0	4	Lithuania						
0		Macedonia						
0		Moldova			ોલેલેલેલેલેલે	સિવવવવવ		
0	4	Montenegro						
0	4	Poland						
0	4	Romania						
0	4	Russia				i da da da da da da da da da da da da da		
0	4	Serbia			(લેવેલેલેલેલેલ	(લવલવાન		
0	4	Slovakia						
0	4	Slovenia						
0	4	Ukraine				12000000		
1	4	Eastern Europe	ERRERE.					

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				International Private Line Services				
				vided Over		vided Over		
				Circuits		Circuits		
			1 dointies	64 Kbps	resolu	64 Kbps		
Region			Customer	Equivalent	Customer	Equivalent		
Summary	Region		Revenue	Circuits	Revenue	Circuits		
Code	Code	Foreign Point	(a)	(b)	(c)	(d)		
0	5	Bahrain	(4)	(~)				
0	5	Iran				0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0 {0		
0	5	Iraq						
0	5	Israel						
0	5	Jordan						
0	5	Kuwait			14444444	(લલવલલન		
0	5	Lebanon				0909090909090		
0	5	Oman						
0	5	Palestinian Territories						
0	5	Qatar						
0	5	Saudi Arabia				1999999		
0	5	- 7						
0	5							
0	5							
1	5							
0	6	Belize						
0	6	Canada						
0	6	Costa Rica						
0		El Salvador						
0		Guatemala						
0		Honduras						
0		Mexico						
0		Nicaragua						
0					Renendani			
0	6							
1	6	North and Central America	Re4e4e4e4e4e4e4e4	ાલે હતા હતા	1.6565656	a mia mia mia		

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

			International Private Line Services			
				ovided Over		ovided Over
				s Circuits	Resold Circuits	
			1 dollitios	64 Kbps	1100010	64 Kbps
Region			Customer	Equivalent	Customer	Equivalent
Summary	Region		Revenue	Circuits	Revenue	Circuits
Code	Code	Foreign Boint				I .
		Foreign Point	(a)	(b)	(c)	(d)
0		Australia				
0		Christmas Island				સાંસમાં સામ
0		Cook Islands			34444444	સવેલવાલ
0		Fiji .			0101010101010101	010101010101010
0		French Polynesia				
0		Kiribati				
0		Marshall Islands				
0		Micronesia, Federated States of				
0		Nauru				
0		New Caledonia			1444444	સવવવવવ
0		New Zealand			0   0   0   0   0   0   0   0	\$\{\$\{\$\{\$\}\}\$
0		Niue				
0		Norfolk Island				
0		Palau				
0	7	Papua New Guinea				
0		Pitcairn Island			1444444	સવવવવવ
0	7	Samoa (Independent State of)			0101010101010101	0101010101010
0	7	Solomon Islands				
0	7	Tonga				
0	7	Tuvalu				
0	7	Vanuatu				સાંસમાં સામ
0	7	Wallis and Futuna			34444444	સવવવવવ
1	7	Oceania				
0	8	Argentina				
0	8	Bolivia				
0	8	Brazil				
0		Chile				કાર્ય લાગ લાગ છે.
0		Colombia			44-44-4-4	કે ત્વન વન વ
0		Ecuador				
0		Falkland Islands (Islas Malvinas)				
0		French Guiana				
0		Guyana				
0		Paraguay				
0		Peru				
0		Suriname				
0		Uruguay				
0		Venezuela				
1	8		A - (A - (A - (A	010 310 3100		

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				es		
			Service Pro	ovided Over	Service Pro	ovided Over
			Facilities	s Circuits	Resold	Circuits
				64 Kbps		64 Kbps
Region			Customer	Equivalent	Customer	Equivalent
Summary	Region		Revenue	Circuits	Revenue	Circuits
Code	Code	Foreign Point	(a)	(b)	(c)	(d)
0	9	Andorra			pipipipipipipi	04040404040404
0	9	Austria				
0	9	Belgium				
0	9	Cyprus				
0	9	Denmark				
0	9	Faroe Islands			14444444	વલવલવલ
0	9	Finland				
0	9	France				
0	9	Germany				
0	9	Gibraltar				
0	9	Greece			8444444	સવલવલન
0	9	Greenland			0909090909090	
0	9	Holy See				
0	9	Iceland				
0	9	Ireland				
0		Italy			14444444	વલવલવલ
0	9	Liechtenstein			0909090909090	
0	9	Luxembourg				
0		Malta				
0		Monaco				
0		Netherlands				
0	9	Norway			0[0]0[0]0[0]0[0]	4 (4) (4) (4) (4) (4)
0		Portugal				
0						
0		Spain				
0					કલવવવવવ	કલવવવવવ
0						
0		Turkey				
0	9	United Kingdom				
1	9	Western Europe	14 14 14 14 14 14 14 14 14 14 14 14 14 1			

Name of Filing Entity:	
Filing Date:	
Reporting Period:	

				International Private Line Services			
				Service Provided Over		ovided Over	
			Facilities	s Circuits	Resold Circuits		
				64 Kbps		64 Kbps	
Region			Customer	Equivalent	Customer	Equivalent	
Summary	Region		Revenue	Circuits	Revenue	Circuits	
Code	Code	Foreign Point	(a)	(b)	(c)	(d)	
0	10	Antarctica					
0	10	International Mobile Satellite Systems					
1	10	Other Regions					
1	11	World Total					

#### **Traffic and Revenue Report**

## Schedule 4 International Miscellaneous Services

Nan	e of Filing Entity:	
Filin	g Date:	
Rep	orting Period:	
		World-Total Customer Revenue
Miso	cellaneous Service # 1	
1	Name of Miscellaneous Service	
2	Description of Miscellaneous Service	
3	Revenue for reporting period	
Misc	cellaneous Service # 2	
1	Name of Miscellaneous Service	
2	Description of Miscellaneous Service	
3	Revenue for reporting period	

### **Traffic and Revenue Report**

## Schedule 4 International Miscellaneous Services

Nan	ne of Filing Entity:	
Filir	ng Date:	
Rep	orting Period:	
		World-Total Customer Revenue
Mis	cellaneous Service # 3	
1	Name of Miscellaneous Service	
2	Description of Miscellaneous Service	
3	Revenue for reporting period	
Mis	cellaneous Service # 4	
1	Name of Miscellaneous Service	
2	Description of Miscellaneous Service	
3	Revenue for reporting period	

### **Traffic and Revenue Report**

## Schedule 4 International Miscellaneous Services

Nam	e of Filing Entity:		
Filing	g Date:		
Repo	orting Period:		
			World-Total Customer Revenue
Misc	ellaneous Service # 5		Nevenue
1	Name of Miscellaneous Service		
2	Description of Miscellaneous Serv	ice	
3	Revenue for reporting period		
Misc	ellaneous Service # 6		
1	Name of Miscellaneous Service		
2	Description of Miscellaneous Servi	ice	
3	Revenue for reporting period		
Total	l Miscollanoous Sorvico Povonuo		

#### **Appendix E: Circuit Capacity Report**

# Circuit Capacity Report International Terrestrial and Satellite Circuits

As of December 31 of the Reporting Period

Name of Filing Entity:	
Filing Date:	
Reporting Period:	
Terrestrial and Satellite World To	otal Active Circuits
	64 Kbps Equivalent Circuits
Terrestrial Common Carrier Active Circuits	
Satellite Common Carrier Active Circuits	
Satellite Non-Common Carrier Active Circuits	

**Total Circuits** 

# International Submarine Cable Capacity Cable Operators

Name of Filing Entity:		
Filing Date:		
Reporting Period:		
	Cable C	apacity
	(a)	(b)
	(Gp	bs)
	Available	Planned
	Capacity	Capacity
Atlantic Region		
Atlantic Crossing (AC-1)		
Columbus III		
Level 3		
AC-2		
TAT-14		
FLAG Atlantic-1		
Hibernia Atlantic		
TGN-Atlantic	_	
Apollo Cable	.	
Emerald Express Cable System	.	
Other Cable (Enter Name)	_	
Total Atlantic Region		

# International Submarine Cable Capacity Cable Operators

Name of Filing Entity:		
Name of Fining Linity.		
Filing Date:		
Timig Date.		
Reporting Period:		
	Cable C	apacity
	(a)	(b)
	(Gp	
	Available	Planned
	Capacity	Capacity
America Region		
Taino-Carb		
Antillas 1		
BAHAMAS II		
Pan American Cable System		
AmeriCan-1		
Americas II		
PAC		
Maya-1		
GlobeNet		
SAC		
ARCOS-1		
SAm-1		
Bahamas Internet Cable Network (BICS)		
SMPR-1		
Global Caribbean Network (GCN)		
Antilles Crossing		
CFX-1 Cable System		
Gemini Bermuda System		
CB-1		
America Movil Submarine Cable System (AMX1)		
Pacific Caribbean Cable System (PCCS)		
Other Cable (Enter Name) Total Americas Region		
i lotal Americas Region		

# International Submarine Cable Capacity Cable Operators

Name of Filing Entity:		
Filing Date:		
Filing Date:		
Reporting Period:		
	Cable C	apacity
	(a)	(b)
	(Gp	` '
	Available	Planned
	Capacity	Capacity
Pacific Region		
PC-1		
China-U.S. Cable Network		
Southern Cross		
Japan-U.S. Cable Network		
Australia-Japan Cable (Guam)		
TGN-Pacific		
Trans-Pacific Express Cable System (TPE)		
Telstra Endeavor		
Asia America Gateway (AAG)		
PPC 1		
American Samoa Hawaii Cable		
HANTRU1		
Unity Cable System		
Honotua Cable System		
GOKI		
Other Cable (Enter Name)		
Total Pacific Region		

## International Submarine Cable Capacity Capacity Holders

Name of Filing Entity:			]			
Filing Date:						
Reporting Period:			]			
			Capacity	Holdings		
	(a)	(b)	(c)	(d)	(e)	(f)
	,	1 /	(STM-	1 Units)	, ,	,,
	Cable Ownership	Net IRUs	Net Inter-Carrier Leaseholds	Net Capacity Held (d) = (a)+(b)+(c) (d) = (e)+(f)	Activated Capacity	Non-Activated Capacity
Atlantic Region						
Atlantic Crossing (AC-1)						
Columbus III						
Level 3						
AC-2						
TAT-14						
FLAG Atlantic-1						
Hibernia Atlantic						
TGN-Atlantic						
Apollo Cable					·	
Emerald Express Cable System						
Other Cable (Enter Name)						
Total Atlantic Region	_					

## International Submarine Cable Capacity Capacity Holders

Name of Filing Entity:			]							
Filing Date:			]							
Reporting Period:			]							
	Capacity Holdings									
	(a)	(b)	(c)	(d)	(e)	(f)				
	(a)	(D)		-1 Units)						
			(STIVI-	l Ullis)		1				
	Cable Ownership	Net IRUs	Net Inter-Carrier Leaseholds	Net Capacity Held (d) = (a)+(b)+(c) (d) = (e)+(f)	Activated Capacity	Non-Activated Capacity				
America Region										
Taino-Carb										
Antillas 1										
BAHAMAS II										
Pan American Cable System										
AmeriCan-1										
Americas II										
PAC										
Maya-1										
GlobeNet										
SAC										
ARCOS-1										
SAm-1										
Bahamas Internet Cable Network (BICS)										
SMPR-1										
Global Caribbean Network (GCN)										
Antilles Crossing										
CFX-1 Cable System										
Gemini Bermuda System										
CB-1										
America Movil Submarine Cable System (AMX1)										
Pacific Caribbean Cable System (PCCS)										
Other Cable (Enter Name)										
Total Americas Region										

## International Submarine Cable Capacity Capacity Holders

Name of Filing Entity:			]							
Filing Date:			]							
Reporting Period:			]							
	Capacity Holdings									
	(a)	(b)	(c)	(d)	(e)	(f)				
	(4-)	(4)	(STM-	1 Units)	(-)	(-)				
	Cable		Net Inter-Carrier	Net Capacity Held (d) = (a)+(b)+(c)	Activated	Non-Activated				
	Ownership	Net IRUs	Leaseholds	(d) = (e)+(f)	Capacity	Capacity				
Pacific Region				(-) (-) ()	, , , , , ,	, , , , , , ,				
PC-1										
China-U.S. Cable Network										
Southern Cross										
Japan-U.S. Cable Network										
Australia-Japan Cable (Guam)										
TGN-Pacific										
Trans-Pacific Express Cable System (TPE)										
Telstra Endeavor										
Asia America Gateway (AAG)										
PPC 1										
American Samoa Hawaii Cable										
HANTRU1										
Unity Cable System										
Honotua Cable System										
GOKI										
Other Cable (Enter Name)										
Total Pacific Region										