

Facilities-Based International Service Providers - Initial List of Foreign Direct Termination Arrangement Routes Due November 14, 2018

November 5, 2018

The Federal Communications Commission (Commission or FCC) has [announced](#) the filing procedures and deadline for facilities-based international service providers (Service Providers) to submit lists of U.S.-international routes on which the Service Provider has direct termination arrangements with a foreign carrier in the foreign destination (the "Route List"). The FCC adopted the Rule 63.22(h) Route List filing requirement in 2017 when it eliminated the annual International Traffic and Revenue Report previously required of all international service providers. The intended purpose of the Route List is to enable the Commission to issue targeted data requests to Service Providers serving particular routes of interest to the FCC such as when the Commission is evaluating a claim of anticompetitive conduct on U.S. -international routes or is reviewing a proposed merger. Such data requests could include any of the information, such as settlement payments for call completion on foreign networks, foreign-billed settlements receipts, foreign-billed revenues, *etc.*, that previously was provided in the annual International Traffic Report.

Initial Route Lists must be filed with the FCC by **November 14, 2018**, via the FCC's International Bureau Filing System.

Following is general information regarding the Route List filing requirement.

Who Must File:

Service Providers with existing direct termination arrangements must submit the initial Route List by November 14, 2018 and submit any updates within thirty (30) days after adding a new route or discontinuing an existing route. Service Providers without direct termination arrangements do not need to submit any information by the initial filing due date but must submit a Route List within thirty (30) days of entering into a direct termination arrangement with a foreign provider in the destination country.

Route List Information Requirements:

Initial and updated Route List filings must include the Service Provider's name, list of all international section 214 authorizations held, and list of U.S.-international routes on which the Service Provider has a direct termination arrangement with a foreign carrier in the foreign destination. For update filings, the submission also must include a summary of the changes to the Service Provider's previous Route Lists. Each Route List filing must include a certification signed by an officer of the filer and attesting to the accuracy and completeness of the Route List filing. Contact information for the officer and for the Service Provider's official contact or attorney of record must be included in the

certification.

Confidentiality:

The Commission treats Route List filings as not routinely available for public inspection but filers may request confidential treatment of the Routes List by making the required showing under FCC rule 47 C.F.R. §0.459.

For more information regarding this client alert, please contact your usual Kelley Drye attorney or any member of the Communications Practice Group. For more information on the Communications Practice Group, please [click here](#).