

FCC Announces Effectiveness of New International Reporting Requirements, Deadline for Filing Uncertain

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In January 2013, the Federal Communications Commission (“FCC”) comprehensively revised its reporting rules applicable to providers of international telecommunications, making numerous substantive revisions to the categories of providers subject to the reporting requirements, the information to be reported and the format of the reports. See our [advisory](#) on the January 2013 Order. But the effectiveness of the Order had been delayed, in large part, pending approval by the Office of Management and Budget (“OMB”). In a [Public Notice](#) issued Friday, February 13, the Commission announced that the new Section 43.62 annual International Traffic and Revenue report and Circuit Capacity report (the “Annual International Reports”) requirements, and the associated revised filing manual, are effective as of February 11, 2015.

Filers, thus, are now required to submit the Annual International Reports in accordance with the processes and specifications of rule 43.62 and the [43.62 filing manual](#). The reporting changes include creation of an online filing portal. However, it is not certain that the online filing system will be ready in time for the March 31, 2015 annual circuit capacity report filing. Indeed, the Public Notice suggests that the filing date has been suspended for now. The FCC will issue another Public Notice announcing the implementation of the online filing system and the due date for the annual circuit capacity report.

International providers of telecommunications, including interconnected VoIP providers, should review the new filing manual and take time to become familiar with the new reporting obligations in advance of the announcement of the Circuit Capacity report filing deadline for 2015. We have every reason to believe that the annual Traffic and Revenue Report deadline will remain the same, July 31. But the January 2013 Order modified the requirements for this second report as well. So, again, we recommend that providers ascertain whether, under the revised 43.62 and the new filing manual, they must file. If so, then the new requirements concerning Traffic and Revenue Report should be reviewed as well.