

FCC International Bureau Announces Filing Window for Annual International Circuit Capacity Reports – Reports Due by April 30, 2015

Chip Yorkgitis

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As we noted in a [February post](#), the Federal Communications Commission's ("FCC") new Section 43.62 international reporting requirements became effective on February 11, 2015. Now the FCC has made clear that the upcoming filing deadline for the Section 43.62 (a) annual international circuit capacity reports is postponed one month until from March 31 to April 30 -- at least for this year. Because the new online filing portal has not been available for filings, the FCC suspended the regular March 31 filing date. In a Public Notice issued March 9, 2015, the International Bureau announced the April 30 deadline and that the new online report filing portal will be open from March 30, 2015, to April 30, 2015 for submissions. The FCC urges circuit capacity holders to file their reports "as early as possible" during the filing window.

The Public Notice reiterates that the following categories of circuit capacity holders are subject to the reporting requirement:

"(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; (3) any licensee of a submarine cable 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."

Each filing entity must enter all data directly into the online form, except for submarine cable operator data and submarine cable capacity holder data, which must be uploaded into the system using the templates attached to the Public Notice.

We encourage all entities that must file to review the Section 43.62 filing manual to ensure familiarity with the modified rules applicable to preparing the circuit capacity report due April 30, 2015, and the annual international traffic and revenue report which we anticipate will be due, as set forth in the rules, by July 31.

One final note: the rule establishing the deadlines for the annual circuit capacity reports has not changed despite the change of filing date this year. Accordingly, absent further notice from the FCC, filers should assume that next year's annual report will be due on March 31, 2016.

For more information about this and related issues, please contact one of the attorneys below.

[Chip Yorkgitis](#)

(202) 342-8540

cyorkgitis@kelleydrye.com