

International Facilities-Based Service Providers - List of Foreign Direct Termination Arrangement Routes Due to the FCC by November 14, 2018

November 7, 2018

International service providers likely celebrated when the Federal Communications Commission (“Commission”) eliminated the annual International Traffic and Revenue reporting requirement [last year](#) but may have forgotten about the Commission’s plan to issue targeted data requests, when necessary, to obtain information previously available from the annual report. Well the time has come and the Commission [now is collecting the basic data](#) that will allow it to tailor its information requests in the future. As required by Commission rule 63.22, international facilities-based service providers must file with the Commission, by **November 14, 2018**, lists of U.S.-international routes on which the provider has direct termination arrangements with a foreign carrier in the destination country (Route List).

The Route Lists should enable the Commission to issue targeted information requests to service providers serving routes of interest to the Commission such as when the Commission is evaluating a claim of anti-competitive conduct on a U.S.-international route or is reviewing a proposed merger. The Commission’s [2017 order](#) noted that these targeted 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.

International facilities-based service providers with existing direct termination arrangements with a foreign carrier in the destination country must file the initial Route List by the November 14, 2018 deadline and file updates within thirty (30) days of adding a termination arrangement for a new foreign destination or discontinuing a previously identified termination arrangement. New international facilities-based service providers or those that do not currently have direct termination arrangements with a foreign carrier in the destination country do not have to make any filing until they enter into such an arrangement. However, once they enter into a direct termination arrangement, the provider has only thirty (30) days to submit the Route List to the Commission.

The Commission is treating the Route Lists as not routinely available for public inspection but filers can choose to request confidential treatment of the Routes List by making the required showing under the FCC’s rules.