

Notes to Table of Billing Codes:

- \* Facilities-based services are provided using international transmission facilities owned in whole or in part by the carrier providing service. Facilities-resale services are provided by a carrier using non-switched international circuits leased from other reporting carriers. These are distinct from pure resale services, which are switched services that are provided by reselling the international switched services of other carriers.
  
- \*\* Traditional settlement arrangements consist of traffic settled pursuant to the Commission's International Settlement's Policy (ISP). See 47 C.F.R. §§ 43.51(e), 64.1001, 64.1002 (2009). In 2004, the Commission lifted the ISP requirements from agreements involving foreign carriers that do not have market power and on routes where the termination rates for U.S.-international services were below benchmark. See *International Settlements Policy Reform, International Settlement Rates*, IB Docket No. 02-234, First Report and Order, 19 FCC Rcd 5709, 5723-25, ¶¶ 27-28 (2004). Currently, 165 routes are exempted from the ISP. See [http://www.fcc.gov/ib/pd/pf/isp\\_exempt.html](http://www.fcc.gov/ib/pd/pf/isp_exempt.html). See also *U.S.-Cambodia Route Exempted from the International Settlements Policy*, Public Notice, IB Docket Nos. 02-324, 96-261 20 FCC Rcd 963 (Int'l. Bur. 2005). For a discussion of benchmarks, see *International Settlement Rates*, IB Docket No. 96-261, Report and Order, FCC 97-280, 12 FCC Rcd 19806, ¶ 1 (1997); *Report and Order on Reconsideration and Order Lifting Stay*, 14 FCC Rcd 9256 (1999); *aff'd sub nom. Cable & Wireless P.L.C. v. FCC*, 166 F.3d 1224 (D.C. Cir. 1999).

Non-Traditional settlement arrangements consist of all traffic other than traditionally settled traffic.

- \*\*\* The U.S. carrier does not make a settlement or settlement-like payment directly to the carrier in the country of termination. The U.S. carrier reports as settlement payments for the country of termination any amounts owed to the carrier(s) in the intermediate point. This amount should include any amounts paid by affiliates to the terminating carrier associated with this traffic.