

FCC Report 43.82

Manual for Filing Section 43.82 Circuit Status Data in accordance with the FCC's Rules and Regulations

OMB No.: 3060-0572

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NOTICE TO INDIVIDUALS

Section 43.82 of the Commission's Rules requires that each common carrier engaged in providing facilities-based international telecommunications service between the United States and foreign points shall file annually the status of its circuits used to provide international services. The collection of Section 43.82 circuit status data stems from the Commission's authority under the Communications Act of 1934, Sections 4, 48, 48 Stat. 1066, as amended, 47 U.S.C. 154 unless otherwise noted. Interpret or apply Sections 211, 219, 48 Stat. 1073, 1077, as amended; 47 U.S.C. 211, 219, 220. Section 63.23(e) of the FCC's Rules requires that non-dominant carriers providing international resold private lines file annual circuit addition reports. The collection of Section 63.23(e) circuit addition data stems from the Commission's authority under the Communications Act of 1934, Sections 1, 4(i), 4(j), 201-205, 218 and 403 of the Communications Act of 1934, as amended, 47 U.S.C. secs. 151, 154(i), 154(j) 201-205, 218 and 403, unless otherwise noted.

The public reporting for this collection of information is estimated to average 11 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0572), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to jboley@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS ADDRESS.

Remember – you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number of 3060-0572.

The foregoing Notice is required by the Privacy Act of 1974, P.L. 93.579, December 31, 1974, 5 U.S.C. 552(a)(e)(3), and the Paperwork Reduction Act of 1995. P.L. 104-13, October 1, 1995, 44 U.S.C. 3507.

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Contents	Page
Introduction	4
<u>Section 1</u> - Definitions and General Information	6
A. Carriers that must file International Telecommunications Circuit Data	6
B. International Points used for Reporting Purposes	7
C. Service Categories Used for Reporting Data	9
1. International Message Telephone Service	9
2. International Private Line Service	10
3. Miscellaneous or Other International Service	11
D. Filing Country-by-Country data for Each U.S. Point Served	12
1. Filing by U.S. Point	12
2. Filing data on a Country-by Country Basis	12
E. Facility Codes	14
F. Measurement of Circuits	14
1. Classification by Service	15
2. Calculation of Bearer and Derived Circuits	15
3. Reporting Activated and Idle circuits	16
G. Filing Procedures	16
<u>Section 2</u> - Diskette Format and Coding Instructions	20
A. Media and File Name for Traffic Data filed on Diskette	20
B. Record Formats	20
C. Filing Carrier Name Field	22
D. Year of Data Field	22
E. U.S. Point Served Field	22

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

Approved by OMB
3060-0572
Estimated time per response: 11 hours

F.	International Point or Region Field	23
G.	Service Code Field	21
H.	Footnote Code Field and Comment Records	24
I.	Description Field	25
J.	Facility Code Field	26
K.	Data elements	26

Introduction

This manual is organized in two sections. Section 1 defines international telecommunications service, explains the service categories, defines the data requirements, and contains filing instructions. Section 2 defines a computerized format, and explains specialized codes that carriers must use for reporting data.

Section 43.82 was added to the Commission's Rules and Regulations to govern international circuit reporting.¹ Section 43.82(a) of the FCC's Rules requires that each facilities-based common carrier engaged in providing international telecommunications service between the United States and foreign points shall file annually the status of its circuits used to provide international services.² Section 43.82(c) requires that circuit reports be furnished in conformance with instructions and reporting requirements prepared under the direction of the Chief, International Bureau, prepared and published as a manual.

Circuit status reports provide a list of a carrier's circuits by facility by service and by country *for a point in time* (December 31st of each reporting year). Circuit addition reports provide a list of circuits by facility, by service, and by country *added during the prior year*.³ Circuit status and

¹ Rules for the Filing of International Circuit Status Reports, CC Docket No. 93-157, 10 FCC Rcd 8605 (1995).

² 47 CFR Section 43.82.

³ Section 63.23(e) of the FCC's rules requires that any party certified to provide international resold private lines to a particular geographic market shall report its circuit additions on an annual basis. In order to reduce burden on carriers and to avoid any ambiguity between reports, the manual is structured to accommodate both circuit status and circuit addition reports. This allows carriers to file Section 63.23(e) circuit addition reports that will presumptively satisfy the requirements of Section 63.23(e) of the Commission's rules. Data filed in accordance with the manual will provide a circuit inventory as of December 31st of each year and, in conjunction with data filed for the prior year, will show additions and changes over the prior year. Circuit addition reports should indicate the specific services provided and the country served. Supra fn 1.

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3060-0572
Estimated time per response: 11 hours

circuit addition data will be summarized in FCC statistical reports that will be made available to industry and to the public. The FCC will use this information to develop and support United States positions in discussions with foreign governments and international standards organizations, such as the International Telecommunications Union. In addition, international circuit status reports will be used to help determine and monitor payment of fees now paid on a circuit basis pursuant to Section 6003(3) of the Budget Act of 1993.

The manual contains reporting requirements for circuit status reports. The manual may also be used to file the Section 63.23(e) reports required of international private line resale carriers.⁴ Facilities-based circuits are international circuits in which a carrier has an ownership interest. For this purpose, the term ownership interest includes outright ownership, indefeasible right of use (IRU) interests, or leasehold interest in bare capacity in an international facility, regardless of whether the underlying facility is a common or non-common carrier submarine cable or an INTELSAT or other satellite system. These are distinct from resold circuits which are private lines leased from another reporting international carrier and which are reported in section 63.23(e) international circuit addition reports.

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⁴ The definitions herein of facilities-based and private line resale carriers are solely intended to govern reporting of international circuits, and are not intended for any other purpose.

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Section 1

Definitions and General Information

A. Carriers that must file International
Telecommunications Circuit Data

Section 43.82(a) of the FCC's Rules requires that each international common carrier authorized as a facilities-based carrier must file annual circuit status reports. Specifically:

"Each facilities-based common carrier engaged in providing international telecommunications service between the area comprising the continental United States, Alaska, Hawaii, and off-shore U.S. points and any country or point outside that area shall file a circuit status report with the Chief, International Bureau, not later than March 31 each year showing the status of its circuits used to provide international services as of December 31 of the preceding calendar year."

Section 63.23(e) of the FCC's Rules requires:

"Any party certified to provide international resold private lines to a particular geographic market shall report its circuit additions on an annual basis. Circuit additions should indicate the specific services provided (e.g., IMTS or private line) and the country served. This report shall be filed on a consolidated basis not later than March 31 of the preceding calendar year."

For purposes of these rules, telecommunications services allow the public to communicate by means of electronic signals transmitted by cable, wire, radio, visual or other electromagnetic or fiber optic systems and can entail the carriage of traffic or the provision of dedicated communications channels. A service channel or circuit is a path for electronic transmission of information between two or more points. All international common carriers that provide service over their own facilities or over resold facilities must file either circuit status or circuit addition reports respectively.

For the purpose of reporting international telecommunications circuit data, an international facilities-based carrier is any entity that is authorized as such. Facilities-based carriers use one or more international channels of communications to provide an international service. An international channel is a cable, wire or radio link that facilitates electronic communications between a United States point and another world point. A facilities-based carrier has an ownership interest, an IRU interest, or a leasehold interest in bare capacity in an international facility, regardless of whether the underlying facility is a common or non-common carrier submarine cable or an INTELSAT or other satellite system. Leased satellite circuits are reported by the carriers that lease the circuits, rather

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than by the underlying carrier, such as Comsat. All facilities-based circuits must be included in circuit status reports filed in accordance with this manual.

The manual for filing Section 43.61 international traffic Data provides the following definitions: Facilities Resale services are provided by a carrier utilizing non-switched international circuits leased from other reporting international carriers. Pure resale services are switched services that are provided by reselling the international switched services of other carriers. Pure resale carriers may own domestic switches and circuits, but rely on other carriers to carry switched traffic between the United States and foreign points.

International resold private line circuits that do not meet the definition of facilities-based circuits must be reported in Section 63.23(e) circuit addition reports. Note that the underlying facilities-based carrier providing the circuits that are resold report those circuits in Section 43.82 Circuit Status reports. Carriers that provide switched services only by pure resale do not have circuits and should not provide either circuit status or circuit addition reports.

This manual allows carriers to file the same type of data in the same format for both facilities-based and resold private line circuits, regardless of whether the data is filed to satisfy Section 43.82, Section 63.23(e), or both of those sections of the Commission's rules.

B. International Points used for Reporting Purposes

This manual defines three categories of geographic points. Domestic U.S. points are the 50 states, the District of Columbia, and Puerto Rico. Off-shore U.S. points include U.S. possessions such as American Samoa, Guam, Baker Island, Howland Island, Jarvis Island, Johnston Atoll, Kingman Reef, Midway Atoll, Navassa Island, the Northern Mariana Islands, Palmyra Atoll, the U.S. Virgin Islands, and Wake Island. The Domestic U.S. and Off-shore U.S. points are collectively referred to herein as the United States or as U.S. points. All other points of the world, including ships operating in international waters, are Foreign points. Canada, Saint Pierre and Miquelon, and Mexico, which were not encompassed by the older term 'overseas points', are foreign points.

United States and foreign points are identified in the Common Carrier Bureau Industry Analysis Division report titled *International Points used for FCC Reporting Purposes (International Points)*, released April 1, 1994. *International Points* lists world points that originate or receive international telecommunications traffic. The report contains the country and region codes that must be used to file circuit data. The report is published periodically and shows various classification schemes for world points. Revisions to International Points will reflect changes in political boundaries and the extent and operation of international telecommunications networks.

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3060-0572
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The geographic categories Domestic U.S., Off-shore U.S. and Foreign shall be used to determine which circuits must be reported. Circuits that both originate and terminate in Domestic U.S. points are considered to be domestic, and should not be reported under Section 43.82 or Section 63.23(e) of the Rules. All other circuits terminating at a U.S. point must be reported.

The following table illustrates the classification of traffic for various pairs of points:

<u>Service Originating and terminating points</u>	<u>Categorized</u>	<u>Reporting Status</u>
Alaska to Hawaii	Domestic U.S. to Domestic U.S.	Domestic Circuit: not reported
Alaska to Puerto Rico	Domestic U.S. to Domestic U.S.	Domestic Circuit: not reported
U.S. Virgin Islands to Puerto Rico	Off-shore U.S. to Domestic U.S.	U.S. International Circuit: Reported
Alaska to Guam	Domestic U.S. to Off-shore U.S.	U.S. International Circuit: Reported
Alaska to Japan	Domestic U.S. to Foreign	U.S. International Circuit: Reported
Guam to Japan	Off-shore U.S. to Foreign	U.S. International Circuit: Reported
Guam to Wake Island	Off-shore U.S. to Off-shore U.S.	U.S. International Circuit: Reported

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C. Service Categories Used for Reporting Data

Section 43.82(b) of the FCC's Rules requires international facilities-based carriers to report the total number of activated circuits used for each of the international services that they provide. Such carriers also must report the number of idle circuits that they hold. Totals for idle circuits will be reported using service code 20 regardless of which service the circuits are planned for. Total circuits by country, including idle circuits, should be reported using service code 100.

In addition to reporting total circuits and idle circuits, circuits are reported by service provided by the carrier. Thus, if Carrier A provides a private line circuit to Carrier B and Carrier B uses the circuit to provide Message Telephone Service (MTS), Carrier A would report providing a facilities-based private line circuit while Carrier B would report a resold private line circuit used to provide MTS service.

The following service categories and definitions are provided solely to govern the reporting of circuits and do not bear on the legality or treatment of international services for any other purpose:

1. International Message Telephone Service

International message telephone service involves the transmission and reception of speech over the public switched network for which a charge is collected on a minimum charge per call or measured time basis. Per call prices are typically calculated based on the number of minutes or fractions of minutes. Service features, such as operator assistance or credit card billing, may be offered as part of the service and may give rise to additional charges. Through use of modems and other specialized equipment, the customer can use ordinary telephone calls for the transmission of data, video and facsimile messages.

International message telephone services are generally tariffed on a "through" basis from the United States to a particular foreign point. This means that a call is charged a tariffed rate for a particular point of destination, regardless of whether the call goes directly to that country, or transits through some third point. Traditionally, service is provided jointly by a U.S. international message telephone service carrier and one or more foreign correspondent carriers under a "joint operating agreement". Such agreements typically specify the rights, duties, and legal obligations of each correspondent; arrangements such as "proportionate return" which govern the routing of traffic; and provide the accounting rate per unit of international message telephone service traffic. The accounting rate provides the basis for "settling" traffic balances, i.e., compensating one carrier for handling the traffic of the other.

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Carriers offer many types of switched network services with different access and billing arrangements. International message telephone service includes services with dedicated access if the calls are routed through the public switched network. Accordingly, for international reporting purposes, the international message telephone service category includes traditional international message telephone service, WATS, 800 and 900 type services, custom network services, conference services, 'country beyond' and 'country direct' service, and similar services. The international message telephone service category can also include switched digital services that utilize ISDN interfaces and switched global defined network services. International message telephone service is reported with service code 1.

2. International Private Line Service

Private line service is the leasing of a dedicated channel of communications (leased circuit) for specified periods of time for the customer's use. Leased private line circuits are typically priced by distance, bandwidth or capacity, and other features such as line conditioning. International private line service does not include private circuits within the United States unless such circuits are dedicated to the provision of international service and are provided pursuant to international tariffs.

The international portion of the service typically begins at a point within the United States and terminates at a connection point halfway between the United States and the destination country. The remaining half of the international private line from the theoretical midpoint to the foreign destination is provided by the U.S. carrier's foreign correspondent carrier. Each carrier bills the customer separately for its half of the service. In actuality, although the service is priced on the basis of a theoretical midpoint, the international circuitry is usually provided by the U.S. and foreign carriers jointly, with each carrier owning an undivided half-interest in the circuits.

Carriers should not report as international private line service data for circuits that both originate and terminate within the domestic United States. In addition, carriers should not report facilities provided under contract to foreign carriers except to the extent that the foreign carrier is paying for facilities from the United States to the theoretical midpoint.

There are two categories of private line service for reporting purposes:

Service Code Description

- 10 Broadcast or Cable television quality quarter, half or full satellite transponders (18 MHz, 24 MHz, 36 MHz or 72 MHz) or digital circuits exceeding 30 million bits per second.

- 11 All other private line circuits

Circuits used to provide switched and virtual private line services should not be included in the private line categories listed above, but rather, should be reported as Miscellaneous service circuits or in the appropriate switched service categories. Switched and virtual private line service allow customers to take a specified amount of capacity with routes to be determined dynamically. These services are considered to be private lines services for some purposes, but not for circuit reporting.

3. Miscellaneous or Other International Service

The final service category includes all common carrier services that are not listed above. The category includes circuits dedicated to the provision of telex, telegraph, cablephoto service, radiophoto service, photo transmission service and addressed press service. The category also includes circuits used for packet switched transmission service, occasional use television, switched video, switched and virtual private line services and some other forms of switched digital service. The category also includes circuits used to provide any new service that differs from services listed above. Miscellaneous or Other international circuits are reported with service code 99.

International message telegraph service involves the transmission and reception of record or textual matter which is not sent directly by the sender and for which a charge is collected on a per word basis. Telex service involves the transmission and reception of record matter, including messages, facsimile and data, charged for on a per minute or timed basis, for which the transmission is directly controlled by the user over an exchange network dedicated to the transmission of such records. Messages may be transmitted via carrier facilities on either a direct dial or on a store and forward basis. The telex network provides for the transmission of communications alternately in either direction, but not in both directions simultaneously. Such services are also referred to as teleprinter exchange services. Telegraph and Telex services are occasionally referred to as record services.

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D. Filing Country-by-Country data for Each U.S. Point Served

1. Filing by U.S. Point

International carriers must file separate data for each United States point from which they provide common carrier services. Carriers may not consolidate circuits for two United States points without obtaining a waiver from the FCC.

Carriers should not include in their report U.S. points that they do not serve.

2. Filing data on a Country-by-Country Basis

For each large U.S. point, carriers must provide country-by-country data on diskette for each service that they provide. For each small U.S. point, carriers may provide world totals by type of facility.

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Reporting requirements for Facilities-Based Service	
Large U.S. points: file Country-by-Country Data on diskette	Small U.S. points: file World Total Data* on diskette
Alaska Conterminous U.S. Guam Hawaii Puerto Rico U.S. Virgin Islands	American Samoa Baker Island Howland Island Jarvis Island Johnston Atoll Kingman Reef Midway Atoll Navassa Island Northern Mariana Islands Palmyra Atoll Wake Island
* Many points on this list are not served by U.S. carriers at this time. Carriers need not file data for points that they do not serve.	

Carriers must file separate data for each of the primary international points listed in *International Points*. However:

- a) Carriers should omit points that would represent domestic circuits. For example, a report for Alaska should not show circuits to Hawaii. However, circuits between domestic and off-shore U.S. points must be reported. For example, a report for Alaska should include circuits to Guam.
- b) Carriers may consolidate circuits as indicated by the summary codes shown in *International Points*. For example, Scotland has country code 280, but also summary code 326. That summary code is the country code for the United Kingdom. Circuits between a U.S. point and Scotland may be reported as Scotland circuits using country code 280 or may be included with other United Kingdom circuits and reported using country code 326.
- c) Carriers should omit countries for which they have no circuits.

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There are no miscellaneous country codes. All circuits must be reported to a country code associated with one of the points listed in *International Points*. Contact the Industry Analysis Division of the Common Carrier Bureau if circuits exist for an international point that is not currently listed. The Industry Analysis Division will assign a code for that point.

Country-by-country reporting is required for all services. Carriers should also file region and world totals for circuits for each of the service categories (MTS, private line - television, private line - other, miscellaneous, and idle) by facility category (satellite, submarine, and terrestrial and other). *International Points* groups all international points into 10 regions. These regions and the reporting codes are listed in Section 2-F below.

E. Facility Codes

Section 43.82(b) of the FCC's rules requires that carriers classify circuits according to technology. International circuits may be provided over terrestrial cable, submarine cable, microwave facilities, satellite circuits, and using other radio frequency systems. Facilities are further identified by whether they are provided as facilities-based circuits versus as resale circuits. International carriers reselling private lines which choose to file their Section 63.23(e) circuit addition reports in accordance with this manual should use the resold circuit facilities codes shown below. Carriers should group all circuits according to the following Facility codes:

<u>Facility Code</u>	<u>Type of facility</u>
1	Facilities-based Submarine cable circuit
2	Facilities-based Satellite circuit
3	Facilities-based Terrestrial cable, microwave, and other facilities circuit
11	Resold Submarine cable circuit
12	Resold Satellite circuit
13	Resold Terrestrial cable, microwave, and other facilities circuit

If the carrier has combined some owned (facilities-based) international facilities and some leased or resold international facilities in order to provide a through circuit, then the circuit should be reported as a facilities-based circuit.

F. Measurement of 64 Kbs and 3 or 4 Khz Circuits

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Carriers are required to report total circuits by service and by type of facility on a country-by-country basis. Carriers must file the number of 64 Kilobits per second (or 3 and 4 KiloHertz) circuits and the number of derived circuits in use at year end. Carriers must also file the number of idle circuits. All circuits must be reported on a country-by-country basis and by type of facility.

Companies should not report non-tariffed circuits provided to affiliates. Those circuits should be treated as the affiliate's circuits if they are used to provide a reportable international service.

The following sections provide guidance on classification by service, calculation of voice equivalent circuits, and classification of circuits as activated or idle.

1. Classification by Service

A leased circuit is a single leased channel of communications that links two specific points. Circuits are not categorized according to how the customer actually uses them, but rather by the service offered to the customer at year end. A single circuit can only be reported once, regardless of how many services it was used to provide. If a circuit is ordinarily used to provide more than one service, then it should be reported for the last service it was used for during the calendar year.

Carriers should report all bearer circuits that they have acquired in international facilities. Those bearer circuits that were not in service on December 31 should be reported as idle circuits using service code 20 and also included in total circuits using service code 100.

2. Calculation of Bearer and Derived Circuits

Carriers are required to provide the number of 64 Kilobits per second (Kbs) or 3 or 4 KiloHertz (Khz) equivalents bearer circuits and also derived circuits, as of December 31 of the year for which data are being reported. Bearer circuits are circuits taken from satellite carriers or in undersea cables. Carriers may use various types of equipment to derive multiple circuits from bearer circuits. Circuits derived by means such as digital circuit multiplication equipment from 64 Kilobit bearer circuits are primarily used to provide switched services and should be reported as derived circuits. Thus, carriers must report both the bearer and derived circuits by type of facility by country. An 18 MegaHertz video channel should be reported as 240 bearer circuits, a 24 MegaHertz video channel should be reported as 288 bearer circuits, and a 36 MegaHertz video channel should be reported as 630 bearer circuits. The number of 64 Kbs bearer circuits should be

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consistent with the data used to calculate regulatory fees. The number of derived circuits should be based on equipment in place on December 31.

3. Reporting Activated and Idle circuits

Circuits used to provide revenue producing service on December 31 should be reported as activated circuits by service. Carriers should report all bearer circuits that they have acquired in international facilities. Those bearer circuits that are not in service on December 31 of the reporting year should be reported as idle circuits using service code 20. Thus, circuits that were taken out of service but which were still available for service should be reported as idle circuits. Circuits that were taken out of service permanently during the year should not be reported.

G. Filing Procedures

Section 43.82 (a) directs carriers to file year end circuit reports by March 31 of the following year. Data filed as circuit addition reports must also be filed by March 31 of the following year. Carriers do not need to file revised data where figures change due to corrections if the corrected figures are within two percent of the figures filed on March 31. Carriers must refile a corrected version of each data record on which one or more data elements was found to be in error by more than two percent.

The following schedule details the number of copies required and the location to which those copies should be delivered. This schedule applies to the March 31 filing.

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Mailing Address	Transmittal Letter *	Certification and paper copy of report	Data on Diskette
FCC Secretary Room TW B-204 445 12th Street, S.W. Washington, D.C. 20554	Original	-	-
FCC International Bureau Policy Division 445 12th Street, S.W. Washington, D.C. 20554	2 copies	Original and 1 copy	1 set
The FCC's Contract Copier ** Portals II, Room CY-B402 445 12 th Street, SW Washington, D.C. 20554	1 copy	1 copy	1 set
<p>* The transmittal letter should identify whether the data is being filed to satisfy Section 43.82, Section 63.23(e), or both sections.</p> <p>** Currently <i>Qualex International</i></p>			

Paper copies must contain data that are identical to the data filed on diskette. Page headings must clearly indicate the filing entity and the United States points covered. Column headings must describe the data contained in each column.

The carrier must include footnote text to explain the specific circumstances of any data for the current period which differs materially from that for the previous period if the difference is not self-explanatory but was caused by unusual circumstances not explained in a previous report. The paper copies of the circuit data must include the text of any footnotes. A data field is provided in the diskette record format to indicate that a footnote has been included in a separate data file record as well as in the paper copies. The paper copies and comment records in the data files should also contain any additional data or information that the carrier deems relevant or necessary to understanding the data it is required to file.

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Approved by OMB
3060-0572
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The transmittal letter should identify the name of the carrier, the date of the filing, and should state whether Section 43.82 data, Section 63.23(e) data, or both are being filed. The original of the transmittal letter should be filed with the Secretary of the FCC. Copies of the transmittal letter should be filed with the Industry Analysis Division and the Commission's current contract copier.

Carriers must certify the accuracy of the data submitted in circuit status and circuit addition data by including a signed certification statement as the last page of the paper report. The statement must be signed by an officer of the reporting carrier. An officer is a person who occupies a position specified in the articles of incorporation (or partnership agreement), and would typically be president, vice president for operations, vice-president for finance, comptroller, treasurer or a comparable position. If the carrier is a sole proprietorship the owner must sign the certification. The original and one copy of the certification statement should be filed with the Policy and Facilities Division. One copy of the certification should be filed with the Commission's current contract copier. The text of the certification statement is included below:

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Approved by OMB
3060-0572
Estimated time per response: 11 hours

CERTIFICATION

I certify that I am an officer of _____; that I have examined the foregoing report and that all statements of fact contained in this report are true and that said report is an accurate statement of the affairs of the above named respondent in respect to the data set forth herein for the period from _____ to _____.

PRINTED NAME _____ POSITION
SIGNATURE _____ DATE

(Persons making willful false statements in the report form can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).)

CONTACT PERSON _____ TELEPHONE NUMBER

Section 2

Diskette Format and Coding Instructions

A. Media and File Name for traffic data filed on diskette

Data may be provided on 3 1/2" floppy diskettes formatted for IBM or IBM compatible personal computers. Carriers serving more than one United States point should provide one file for each point served. All files may be included on the same diskette and a single file may contain data filed in accordance with either Section 43.82 and Section 63.23(e) of the Commission's Rules. The record files should be named according to the following convention:

aaaaaaYY.CCT

where aaaaaa are 3 to 6 alpha characters that identify the filing entity and U.S. point.

YY is the last two digits of the calendar year for which data are being filed.

.CCT is the file extension, (short for circuit)

For example

ATTVI94.CCT might signify AT&T's facilities-based and resale Virgin Islands data for 1994

GRPHNT94.CCT might signify Graphnet's circuit addition filing for 1994

Carriers may file data in more than one file. All files may be placed on the same diskette. Carriers filing multiple files should give each file a unique name.

B. Record Formats

The data files may contain comment records and data records. A comment record has a blank space (ASCII character 32 or " ") in the first position in the line, contains less than 132 characters, and ends with a carriage return. Comment records can be used to provide headings, formatting, and footnotes in the data file. A listing of the data file can be used as the paper copy of

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the data for filing purposes.

All data records must be provided using the record format set forth herein. Each record shall consist of a string of ASCII characters. Fields with "character" content should be left justified within the stated field boundary and may contain the ASCII characters "A" through "Z", "a" through "z", ",", ".", "-", "+", "/", "&", "#", "*", "!", ":", ";", "0" through "9", and blank spaces (ASCII character 32). Fields with "number" content should be right justified within the field boundary, and may contain the ASCII characters "-", "0" through "9" and leading blank spaces, but no commas, decimal points, or other characters. The character "-" signifies a negative value and should appear in the field to the left of the value. Negative values are not possible for any data field.

Each data record should contain the following fields:

<u>Field</u>	<u>Field Positions</u>	<u>Justification Contents</u>	<u>Field within field</u>	<u>Record Size</u>
1. Filing Carrier Name	characters	left	15	1 - 15
2. Year of data	numbers	right	2	16 - 17
3. U.S. Point served	numbers	right	5	18 - 22
4. International Point or region	numbers	right	5	23 - 27
5. Service code	numbers	right	3	28 - 30
6. Footnote indicator	characters	right	3	31 - 33
7. Description	characters	left	36	34 - 69
8. Facility Code	numbers	right	2	70 - 71
9. Data field #1	numbers	right	12	72 - 83
10. Data field #2	numbers	right	12	84 - 95

The data fields are further described in Section 2-K below.

Data files can be created using standard editors, word processors spreadsheet programs, data base programs and custom programs. For example, to create a data file using a spreadsheet:

- Set the column widths to equal the field size shown above. Thus, the first column would be 15 characters wide.
- Enter fields as using a "label" format, rather than using a "numeric value" format. Be careful not to include extra spaces at the end of the line.

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- Specify a generic or character oriented printer {the lotus 3.1 sequence would be </><P>rint <P>rinter <O>ptions <A>dvanced <D>evice <N>ame } Note: the print file will be useless if you specify a graphics printer or if you try to print in WYSWYG mode.
- Set the left, top, and bottom margins to 0, set the right margin to 132. Set the page length to 1000 lines.
- Set the print range.
- Print to a <F>ile, rather than to the actual hardware device, and then <G>o. Rename the resulting file using the naming conventions shown above.

C. Filing Carrier Name Field

The filing carrier name should be between 3 and 15 characters. The name field should appear on all data records filed by the carrier, and should be identical for all records filed by the carrier.

D. Year of Data Field

This field should contain the last two digits of the year for which data are being filed. For example, the March 31, 1996 filing will contain data for 1995. Therefore, the year of data field would be "95". This would appear on every data record in the file.

E. U.S. Point Served Field

The U.S. Point served country code is used to indicate which United States point is covered by the data record. The codes for United States points are in the range 1001 to 1999, and are the country codes shown in *International Points*. Contact the Industry Analysis Division if an Off-shore U.S. point is not listed in the report. The Industry Analysis Division will assign a country code for such points. All records in a file must have the same U.S. point code.

F. International Point or Region Field

Where records contain data for traffic between a U.S. point and a specific international point, the code for that international point should be taken from *International Points* and entered in the International Point field. For example, the code 1 in the international point field would indicate that the record reports traffic between a United States point and Abu Dhabi.

There is no miscellaneous or "all other" country code. All circuits must be reported to a specific point.

Data records will be rejected if the U.S. point and international point are both domestic points.

The international point code for region subtotal and world total summary records should be as follows:

International point code (record field #4)	Description field (record field #7)
9001	Western Europe
9002	Africa
9003	Middle East
9004	Caribbean
9005	North and Central America
9006	South America
9007	Asia
9008	Oceania
9009	Eastern Europe
9010	Other Regions
9999	World Total

Note: Code 9010 - Other Regions, covers Antarctica.

Carriers must file regional and world total circuit counts for each type of facility and by each of the four service categories and for idle circuits. However, country-by-country and region totals are not required for circuits provided from smaller U.S. points. See page 12.

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The international point code 9999 should be used if the record contains world total data for a service. International point code 9999 is not a miscellaneous or "all other" code. This code represents a total for all international circuits between a United States point and the rest of the world. Where country-by-country data are filed, records with international point code 9999 contain the totals of records with the same U.S. region, service, and facility type codes, and with international point codes between 1 and 1999.

G. Service Code Field

The following service codes should be used:

- 1 International message telephone service
- 10 Broadcast or cable television quality quarter, half or full circuits
- 11 All other private line circuit
- 20 Idle circuits
- 99 New, miscellaneous and other services
- 100 Total circuits including idle circuits

H. Footnote Code Field and Comment Records

The footnote code field should be used to indicate that both the paper copies of the circuit data, as well as comment records within the data file, contain a footnote concerning the data record. The carrier must include footnote text to explain the specific circumstances if any data for the current period differs materially from that filed for the previous period and the difference is not self-explanatory but was caused by unusual circumstances not explained in a previous report. For example, a carrier would footnote significant increases in circuits to specific countries due to a merger. The paper copies of the 43.82 data must also include the text of the footnote. These footnotes should be labeled sequentially from 1 to 999, and the footnote should be included in the footnote code field in the data record. Alpha numeric codes may be used only if the carrier needs to provide more than 999 footnotes in the report.

Footnotes and other comments should be included in the data file as comment records. Any record with a blank space (" ") in the first position will be treated as a comment record. Please note that some word processors and spreadsheet programs will insert leading spaces when files are printed to diskette. If this occurs, you will need to use an editor to manually delete the spaces.

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I. Description Field

This field should contain the name of the international point or world region. The name should be identical to the international point name published in International Points. Region names are shown in section 2-F above.

J. Facility Code Field

The facility code field indicates the type of facility used to provide the circuits. Facilities-based and resale circuits cannot be reported on the same data record.

<u>Code</u>	<u>Type of facility</u>
1	Facilities-based Submarine cable circuit
2	Facilities-based Satellite circuit
3	Facilities-based Terrestrial cable, microwave, and other facilities circuit
11	Resold Submarine cable circuit
12	Resold Satellite circuit
13	Resold Terrestrial cable, microwave, and other facilities circuit

K. Data elements

There are 2 data element fields, each of which is 12 characters wide. These fields should contain right justified integer values with no commas, periods, or other punctuation marks. Bearer circuits and derived circuits (switched services only) should be reported as 64 Kbs or 3 or 4 Khz equivalent circuits, rounded to the nearest whole circuit, but in no case rounded to zero (0). The data fields report the actual total amount of circuits in place on December 31 regardless of whether the data record is filed as a circuit status or circuit addition report. Data should be reported as follows

Data field #1 bearer circuits
Data field #2 derived circuits