

ALERT

# FCC's Updated International Reporting Requirements in Effect for 2015 Reports - Changes Require Reporting by New Entities

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The Federal Communications Commission's (FCC) new rule modifying reporting requirements for providers of international telecommunications was made effective as of February 11, 2015. There are two annual reports that must be filed by international telecommunications providers - a circuit status report (due by March 31st) and a traffic and revenue report (due by July 31st). The changed rules expand the types of entities that must file reports to include non-common carrier satellite licensees and all holders of international Section 214 authority, even those not currently providing common carrier services.

**March 31st Circuit Status Report:** The updated rules on circuit status reports now require filing by four different categories of companies:

1. all facilities-based common carriers with active satellite or terrestrial circuits between the United States and a foreign point;
2. all non-common carrier satellite licensees with active circuits between the United States and a foreign point;
3. all licensees of a submarine cable between the United States and a foreign point; and
4. all common carriers with capacity on a submarine cable between the United States and a foreign point.

**July 31st Traffic and Revenue Report:** Under the new rule, traffic and revenue reports must be filed by the following companies:

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1. all entities that hold an international Section 214 authorization, regardless of whether or not the entity provided common carrier services and
2. all entities engaged in providing Voice over Internet Protocol (VoIP) service connected to the PSTN between the U.S. and any foreign point, regardless of whether the entity operated by using its own facilities or reselling the facilities and services of another provider.

The FCC has released an updated instruction manual for the filing of these reports, and is developing an online database for the filing of all reports.