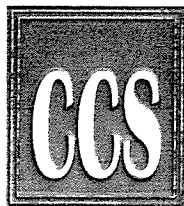


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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CORPORATE COMPUTING SERVICES

January 20, 1999

Ms. Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12TH Street, S.W.
Room TW-B204
Washington, D.C. 20554

Attention: Mr. George Li
Telecommunications Division
International Bureau

Re: International Settlements Policy Modification for Change in Accounting Rate for International Switched Voice Telephone Service with India

Dear Ms. Salas:

Pursuant to 47 C.F.R. § 64.1001 (d) and (f), Processing Management Corporation d/b/a Corporate Computing Services ("CCS") hereby notifies the Commission of its intention to establish a new accounting rate for voice service pursuant to the December 24, 1998 International Telecommunications Services Agreement (the "Agreement") that CCS entered into with Videsh Sanchar Nigam Limited ("VSNL") for international telephone service between the United States and India. This is the first agreement entered into between the parties and does **not** modify, amend or supersede any previous agreement. CCS has not previously provided any telecommunications services to India. The following information is provided in compliance with the requirements of 47 C.F.R. § 64.1001(f):

- 1) The type of international service to be provided under the Agreement is switched voice telephone service between the United States and India;
- 2) The name of the foreign telecommunications administration is Videsh Sanchar Nigam Limited (VSNL);
- 3) There is no prior agreement between the parties, and thus there is no pre-existing accounting rate between the parties for service between the United States and India. It is the understanding of CCS, from information provided by VSNL, that the present accounting rate between VSNL and other U.S. carriers is \$1.28 per minute for international voice service between the United States and India;

- 4) The new accounting rate between the parties pursuant to the Agreement shall be \$1.28 per minute for international voice service between the United States and India;
- 5) The effective date of the new accounting rate shall be that date upon which the parties commence performance of the Agreement. The parties contemplate the commencement of service pursuant to the Agreement on or around February 1, 1999;
- 6) Pursuant to the Agreement, the division of the accounting rate between the parties shall be fifty percent (50%) to CCS and fifty percent (50%) to VSNL.
- 7) Since this is the original agreement between the parties, there are no modifications of any existing agreements between the parties to discuss.

The proposed new accounting rate is in the U.S. public interest because (i) it is the same accounting rate currently used by other carriers providing service to India; (ii) it will enable CCS to establish a competitive position in the international market; and (iii) it will promote competition among telecommunications providers by allowing the entry of a new carrier (CCS) to the India market. The new accounting rate is not in any way designed to enrich the foreign correspondent.

As stated in the attached notarized statement, CCS (i) has not bargained for, and has no knowledge of, exclusive availability of the new accounting rate; (ii) has not bargained for, and has no indication that it will receive, more than its proportionate share of return traffic; and (iii) has informed VSNL that U.S. policy requires that competing U.S. carriers have access on a nondiscriminatory basis to the accounting rate negotiated by CCS and VSNL.

Copies of this Modification Request have been served on all other carriers known by CCS to be providing switched voice services between the United States and India.

Respectfully submitted,



Michael P. Choate
President, Corporate Computing Services

Attachment


cc:

Ken Stanley
Ellen Spano (AT&T)
J. William Busch (MCI)
Marybeth M. Banks (Sprint)

NOTARIZED STATEMENT

I, Michael P. Choate, being duly sworn, state under penalties of perjury, as follows:

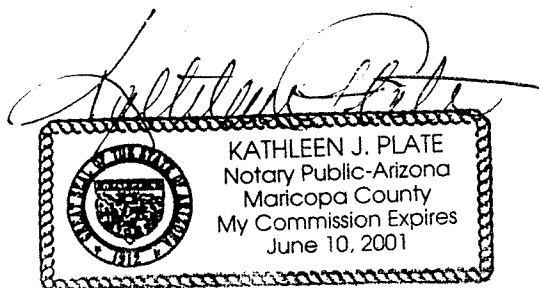
1. I am the president of Corporate Computing Services (Telecommunications), U.S.A. My business office is 18111 North, Tatum Boulevard, Phoenix, Arizona 85028.
2. I am responsible and helped negotiate the accounting rate levels contained in the December 24, 1998 International Telecommunications Services Agreement Between Videsh Sanchar Nigam Limited and Processing Management Corporation d/b/a Corporate Computing Services (Telecommunications), U.S.A. The accounting rate levels are contained in the attached Modification Request filed with the Federal Communications Commission herewith. I am making this statement based on my knowledge of and participation in the negotiations between Corporate Computing Services (Telecommunications), U.S.A. and Videsh Sanchar Nigam Limited regarding the aforementioned agreement and the accounting rate levels contained therein.
3. Corporate Computing Services (Telecommunications), U.S.A. has not bargained for, and has no exclusive knowledge of, exclusive availability of the new accounting rate with Videsh Sanchar Nigam Limited.
4. Corporate Computing Services (Telecommunications), U.S.A. has not bargained for, and has obtained no indication that it will receive, more than its proportionate share of return traffic.
5. Corporate Computing Services (Telecommunications), U.S.A. has informed Videsh Sanchar Nigam Limited that competing U.S. carriers have access on a non-discriminatory basis to the accounting rate negotiated by Corporate Computing Services (Telecommunications), U.S.A. and Videsh Sanchar Nigam Limited.


Michael P. Choate

Notary Public-State of Arizona

Sworn to and subscribed before me this
20 day of January, 1999

June 10, 2001
My commission expires:



CCS
11811 N.Tatum Blvd
Phoenix AZ 85028

.....
facsimile transmittal

To: Fedral Communications **Fax:** 202-418-2824
Commission, Washington DC
20554 (Attn Mr. Troy F.
Tanner)

From: Sarabjit S Grewal **Date:** 02/11/99

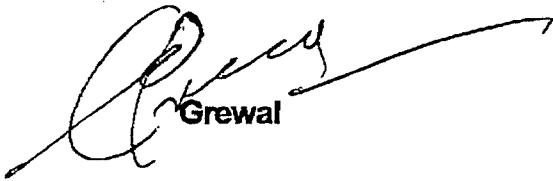
Re: Tele Communication to India Pages: 3

CC:

Urgent For Review Please Comment Please Reply Please Recycl

Sir,

A copy of our letter to VSNL, India, as per your desire expressed in your letter dated Feb 11,1999 addressed to this company is being faxed to you.


Grewal

CONFIDENTIAL

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**CORPORATE COMPUTING SERVICES**

CCS/Tele/G7

To

Videsh Sanchar Nigam Limited (Networks)
Videsh Sanchar Bhawan,
Mahatma Gandhi Road,
Fort, Mumbai - 400 001 (India)

Feb 11, 1998

Attn : Mr. P D Gupta Sr. GM (Networks)

Ref : Agreement for tele traffic from USA to India

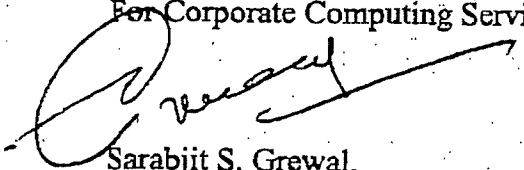
Sub : Acceptance of TAR by FCC

Dear Sir,

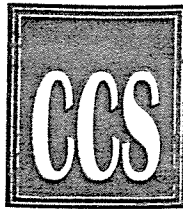
Having entered into an agreement with VSNL on Jan 25, 1999 for carrying tele traffic between India and USA, we filed the agreement with FCC in accordance with the mandatory requirement. The FCC has observed that the rates laid down by the VSNL are not in consonance with the stipulations laid by the FCC, vide which it was desired that India would work towards reaching a benchmark rate of \$ 0.23 per minute by Jan 2001. Consequently the commissions International Bureau has suspended the arrangement and said that it cannot be implemented. You are therefore requested to take with the FCC and arrive at rates suitable to both yourself and the FCC so that we can commence our operations at the earliest

A copy of the FCC letter is being sent to you for your reference.

For Corporate Computing Services



Sarabjit S. Grewal
VP International Operations



CORPORATE COMPUTING SERVICES

To

Mr. Ken Stanley
Senior Economist
Federal Communications Commission
International Bureau
2000 M Street, NW Suite 800
Washington, D. C. 20554
Jul 28, 1999

Dear Mr. Stanley,

The purpose of this letter is to provide notification to the Commission that Processing Management Corporation d/b/a Corporate Computing Services Telecommunications ("CCST") has commenced service to India pursuant to its section 214 authority to operate as a facilities-based carrier granted by the Commission. CCST has previously filed with the Commission, a copy of its Operating Agreement with Videsh Sanchar Nigam Limited (VSNL), for the provision of Switched voice telephone service to India. CCST understands that there is no approved accounting rate in effect at the current time for service between U. S. carriers and India. CCST further understands that when the Commission approves a new accounting rate for service to India, CCST will be obligated to renegotiate its accounting rate with VSNL to comply with the FCC's approved accounting rate.

Please contact me if you have any questions.

Yours Truly,

A handwritten signature in black ink, appearing to read "Sarabjit S. Grewal", is written over a horizontal line. The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail that extends to the right.

Sarabjit S. Grewal
Vice president, International Operations