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*Adria's  
File*

February 22, 2001

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Mr. Donald Abelson  
Chief

International Bureau  
Federal Communications Commission

The Portals -- 8th Floor  
FCC - 445 12th Street, S. W.  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

COPY

Re: Regulatory treatment of international service provided on the U.S.-Belgium route by Southwestern Bell Communications Services, Inc. ("SBCS"); Southwestern Bell Communications Services-Massachusetts, Inc.; Southwestern Bell Communications Services-Maryland, Inc.; Southwestern Bell Communications Services-New York, Inc.; Southwestern Bell Communications-Illinois, Inc.; SBC Global Communications, Inc.; Ameritech Communications, Inc., SNET Diversified Group, Inc.; and SNET America, Inc.

Dear Mr. Abelson:

In light of the Commission's ruling in the *SBCS Texas International 214 Order*,<sup>1</sup> released in June, 2000, we are writing on behalf of SBCS and its above-captioned affiliates and subsidiaries (collectively, "the companies") to acknowledge that the companies qualify for treatment as "dominant" carriers on the U.S.-Belgium route, pursuant to the Commission's rules.<sup>2</sup> The companies therefore will abide by the Commission's rules governing international carriers that are regulated as dominant due to affiliation with a foreign carrier deemed to possess market power on the foreign end of an international route.<sup>3</sup>

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<sup>1</sup> See *Southwestern Bell Communications Services, Inc., Application for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, for Authority to Operate as an International Facilities-Based and Resale Carrier*, File No. ITC-214-20000127-00027, Order, Authorization, and Certificate (rel. June 30, 2000)(*SBCS Texas International 214 Order*).

<sup>2</sup> See 47 C.F.R. §§ 63.09 and 63.10.

<sup>3</sup> See 47 C.F.R. § 63.10(c).

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In the *SBCS Texas International 214 Order*, the FCC found that, in assessing whether SBCS is affiliated with Belgacom S.A., it should treat the indirect interest of SBC (through Ameritech) in Tele Danmark S/A as a controlling interest. Based on finding, SBCS and its affiliates and subsidiaries are now deemed to be affiliated with Belgacom, the incumbent carrier in Belgium.

The companies are not attempting, at this time, to make a showing that Belgacom lacks market power in the relevant local access and international transport market segments in Belgium, although they reserve the right to do so in the future if market conditions change. Therefore, pursuant to Section 63.10(a) of the Commission's rules, the companies acknowledge dominant carrier treatment on the U.S.-Belgium route. The companies will comply with all dominant-carrier obligations, including the structural separation and quarterly reporting requirements detailed in Section 63.10(c)(2).

We would be pleased to answer any further questions regarding this matter.  
Thank you for your time and consideration.

Respectfully,



William F. Maher, Jr.  
Counsel for SBCS-International  
Halprin, Temple, Goodman & Maher



John Alden  
Consultant  
Freedom Technologies, Inc.

cc: Ms. Susan O'Connell  
Mr. George Li