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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Attn: International Bureau

Re: Application of Pacific Telesis Mobile Services for Authority under
Section 214 of the Communications Act – ITC-214-20000516-00368

Dear Ms. Salas:

We represent Pacific Telesis Mobile Services ("PTMS"). This letter will serve to amend the application filed by PTMS on May 16, 2000 for authority, under Section 214 of the Communications Act and Section 63.18 of the Commission's Rules, to resell international telecommunications service.

The overwhelming majority of international service to be provided by PTMS involves the resale of switched services of unaffiliated U.S. carriers. A very small amount of service, however, will not fall within that category. Specifically, PTMS has roaming agreements with a number of foreign carriers, including foreign carriers with whom it is "affiliated" within the meaning of 47 C.F.R. § 63.09. These carriers may provide not only roaming services but also long distance services for the benefit of PTMS customers roaming in their markets. Thus, PTMS will resell some international telecommunications service provided by affiliated foreign carriers.

As a result of this situation, PTMS acknowledges that it will be subject to regulation as a dominant carrier with respect to this traffic on the routes between the countries of certain of its affiliated foreign carriers and the United States. PTMS shall use its best efforts to provide the Commission with all information required by 47 C.F.R. § 63.10.

PTMS further amends Section (f) of its application by stating that pursuant to the Commission's Order in In The Matter of Southwestern Bell Communications Services, Inc., DA 00-1474 (June 30, 2000), the Commission determined that PTMS' ultimate

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Magalie Roman Salas


July 12, 2000

Page 2

parent company, SBC Communications Inc., is a 34% owner of Belgacom S.A., so that PTMS is affiliated with this entity.

As a result of these changes, the countries where the issue described above regarding roaming agreements with affiliated carriers is relevant are Denmark, South Africa, Hungary and Belgium.

Sincerely,



Philip W. Horton