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March 17, 2005

RECEIVED

MAR 17 2005

Federal Communications Commission  
Office of Secretary

BY HAND

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **PLDT Retail, Inc.**  
**Section 63.19 Discontinuance of Retail**  
**International Services**

Dear Ms. Dortch:

Pursuant to Section 63.19 of the Commission's rules,<sup>1</sup> PLDT Retail, Inc. ("PLDT Retail") hereby notifies the Commission of a discontinuance of international service.

PLDT Retail, a subsidiary of PLDT (US) Ltd. ("PLDT US"), sells prepaid calling cards that can be used to make phone calls internationally.<sup>2</sup> PLDT Retail does not sell its calling cards directly to end users. Rather, it sells the cards through distributors that serve as a middle man between PLDT Retail and the end users. PLDT Retail's calling cards, which are sold in denominations of \$5, \$10, and \$20, come in two varieties: physical cards, which are sold at retail outlets, and virtual cards, which are sold on the

<sup>1</sup> 47 C.F.R. § 63.19(a)(2).

<sup>2</sup> The calling cards also can be used to place phone calls domestically. On January 28, 2005, PLDT Retail filed an application for authority to discontinue its domestic prepaid calling card services in accordance with Section 63.17 of the rules. See Public Notice, DA 05-515 (Feb. 28, 2005).

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Internet. Effective March 31, 2005, PLDT Retail intends to discontinue these international services.<sup>3</sup>

Section 63.19(a)(1) of the rules requires that international carriers notify all affected customers, in writing, of planned discontinuance of service at least sixty (60) days prior to such action. The Commission previously has recognized that, in the case of prepaid calling card services, there is good cause for using an alternate method to notify customers. When MCI discontinued a prepaid calling card service in 1999, it stated in its discontinuance application that, "because of the nature of the prepaid card service, no information is available about the product's customer base."<sup>4</sup> The Commission granted MCI's application without requiring it to provide written notice to individual customers.

Similar considerations apply to PLDT Retail's calling card services. PLDT Retail has no direct relationship with the end users of its calling cards, and therefore has no means for providing written notice of a discontinuance of service to each end user. Last December 6, however, it informed its distributors that service was going to be discontinued on March 31, and requested that the distributors return all unsold cards to PLDT Retail. In the case of cards that were previously sold, PLDT Retail believes, based on the expiration dates of its calling cards and past usage patterns, that as of the proposed discontinuance date there will be no remaining customers for its prepaid calling card services.<sup>5</sup> For these reasons, PLDT requests the Commission accept the foregoing actions as sufficient notice under Section 63.19 of the rules.

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<sup>3</sup> In a separate letter filed today, PLDT US is notifying the Commission that it has given at least 60 days advance notice to various customers of a discontinuation of wholesale international service.

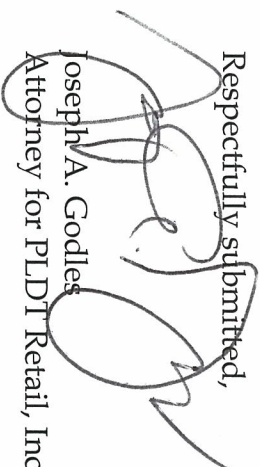
<sup>4</sup> See Public Notice, MCI WORLDCOM Network Services, NSD File No. W-P-D-436 (Aug. 6, 1999).

<sup>5</sup> PLDT also has been using a computer-generated message that customers hear when they activate their cards, alerting them to the last day that the product may be used. Customers who are dissatisfied with the March 31 discontinuance date may, by contacting customer service, be directed on how to return the card and receive a full refund in lieu of using their cards.

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Please direct any questions concerning this matter to the undersigned counsel.

Respectfully submitted,



Joseph A. Godles  
Attorney for PLDT Retail, Inc.

cc: James Ball