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Via International Bureau Filing System

May 13, 2011

Mr. James Ball
Chief Policy Division, International Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-A760
Washington, D.C. 20554

RE: Bharti Airtel (USA), Ltd. Notice of Discontinuance of International Service, ITC-214-20031222-00558

Dear Mr. Ball:

Bharti Airtel (USA), Ltd. (“Airtel” or “Company”), a wholly-owned subsidiary of Bharti Airtel, Ltd., by its regulatory consultants and pursuant to Section 63.19 of the Commission’s rules,¹ hereby provides the International Bureau with notice of Airtel’s intent to discontinue the provision of international prepaid calling card services, effective June 30, 2011. Airtel is *not* seeking to relinquish its existing international authority, in anticipation of offering other forms of international service in the future.

Airtel currently maintains Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service international authority under section 214 of the Communications Act of 1934,² as amended, through its parent corporation Bharti Airtel, Ltd.³ Airtel has served *inter alia* as a non-dominant provider of prepaid calling card services primarily for calls placed to India.

Airtel’s request for discontinuance of its international prepaid service stems from an affirmative business decision to cease providing its resold discretionary prepaid telecommunications services.⁴ Airtel currently serves less than 53,000 remaining active card user accounts, and has made arrangements for remaining customers to continue receiving service until customers’

¹ 47 C.F.R. §63.19.

² 47 U.S.C. §214.

³ ITC-214-20031222-00558.

⁴ Separate application to discontinue domestic interstate telecommunications services pursuant to Section 63.71 of the Commission’s rules has been filed contemporaneously with this Notice.

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prepaid calling account balances have been depleted or June 30, 2011, the date on which the Company will terminate its current international prepaid telecommunications services.

Airtel has provided a discretionary prepaid calling service that supplements, but does not replace, conventional presubscribed, post-paid telecommunications services. As a matter of convention and practical consideration, no written notification of service discontinuance is – or can be -- provided to a majority of users when prepaid calling card accounts are depleted, as would otherwise be possible for post-paid, presubscribed telecommunications services, because the Company does not know the identity of all prepaid service users.⁵ The Company has provided notice to those Customers of record who have replenished card accounts in the past. A copy is attached.

Airtel's prepaid calling services are inherently a discretionary. Such services supplement, but do not replace, post-paid presubscribed telecommunications services. Airtel Customers readily understand that prepaid calling services are strictly temporary in nature, usable so long as funds remain in user prepaid calling accounts or until the service expiration date, whichever occurs first. Customers and their users clearly recognize that once a prepaid account is depleted or expired, service access is no longer available. Once account funds are depleted or upon service discontinuance, network access is terminated, as opposed to service being "discontinued" in a conventional sense. As such, written notice of service discontinuance cannot be provided as it would for ongoing post-paid presubscribed services.

Airtel services have been provided to a very limited, targeted segment of telecommunications users who call India. Airtel has discontinued the sale of its discretionary prepaid calling services. In anticipation of discontinuing the provision of its service, Airtel has allowed users to deplete their prepaid calling card accounts through normal usage. Users have not had the option of renewing accounts, *e.g.* prepaying for additional time.

Notwithstanding the foregoing, remaining Customers will continue to receive recorded notice of how much remains in their prepaid account when accessing the Company's services and entering the account identification number. Customers will further continue to be informed when their accounts are about to become depleted and will be notified by Airtel's customer service if contacting the Company.

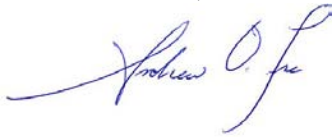
⁵ 47 C.F.R. §63.19(a)(1). Users have been informed of the Company's termination policies at the point of distribution by the Company's logistics company customers.

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Though the Company is ceasing to provide its prepaid international calling service effective June 30, 2011, Airtel wishes to retain its existing international service authorities in anticipation of providing international services in the future. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to
Bharti Airtel (USA), Ltd.

Attachment



Subject: Bharti Airtel (USA) Ltd: Discontinuation of International Calling Card Services

Dear Customer,

1. At the outset we would like to thank you for your patronage and support
2. We regret to inform you that Bharti Airtel (USA) Ltd will not be able to extend its International calling card services (Services) with effect from 30th June, 2011 (2400 hrs). onwards.
3. In accordance with the Customer Service Agreement (Agreement), you may apply for refund by contacting our customer care or writing an email to us or consume your available talk time before the End Date. We assure you that all unutilized talk time balance within the validity period will be duly refunded*
4. Please note the following:
 - (a) You will not be able to recharge any further with effect from 5th June 2011 (0000hrs);
 - (b) Toll free/Local Access services shall remain fully functional till 30th June 2011 (2400hrs);
 - (c) For any queries you may contact our Customer Care at 1-877-247-5150 or write an email at customersupport@airtelcallhome.com.
 - (d) All terms of the Agreement are applicable.
5. We regret the inconvenience caused.

Regards,

Airtel CallHome Team

Bharti Airtel (USA) Limited

245, Park Avenue, 39th floor,

New York, NY 10167

*** You may apply for refund by contacting our customer care 1-877-247-5150 or write an email to Customersupport@airtelcallhome.com. Customer Care will raise trouble ticket and initiate processing of refund. We shall refund the amount within 7 working days. Kindly note that the Credit card through which original transaction is processed should not be expired/ blocked at the time of refund, as Customer will get refund to the same credit card through which original purchase is done.**