

Douglas W. Everette

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February 12, 2015

Mindel De La Torre Chief, International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Notification of Acceptance of Terms and Conditions for Waiver of the Benchmark Rate for Cuba, IB Docket No. 10-95;
IDT Telecom, Inc., International Telecommunications Certificate ITC-214-20100804-00318

Dear Ms. De La Torre:

IDT Domestic Telecom, Inc. ("IDT Domestic")¹ hereby files this letter to notify the Federal Communications Commission ("Commission") that it agrees to accept the terms and conditions of the waiver of the benchmark policy applicable to U.S. carriers seeking to provide telecommunications services on a direct basis to Cuba as specified in the Commission's April 8, 2011 *TeleCuba Waiver Order*, as revised by the Commission's *International Settlements Policy Reform Order*. The Commission's benchmark policy requires U.S. carriers to negotiate settlement rates with foreign carriers that do not exceed specific benchmark levels.

IDT Domestic respectfully requests that the Commission, consistent with the process set forth in paragraph 33 of the *TeleCuba Waiver Order*, reflect IDT Domestic's acceptance of

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IDT Domestic operates as a subsidiary of IDT Telecom, Inc. ("IDT"). IDT has authorization to provide facilities-based and resold services to Cuba. *See, International Authorizations Granted*, Report No. TEL-01457, Public Notice, 25 FCC Rcd 13369 (Sept. 23, 2010). IDT will notify the Commission within thirty (30) days after IDT Domestic begins providing international communications service in accordance with section 63.21(h) of the Commission's regulations (47 C.F.R. § 63.21(h)).

IConnect Wholesale, Inc., d/b/a/ TeleCuba, Petition for Waiver of the International Settlements Policy and Benchmark Rate for Facilities-Based Telecommunications Services with Cuba, IB Docket No. 10-95, IBFS File No. ISP-WAV-20100412-00007, Memorandum Opinion and Order, 26 FCC Rcd 5217 at ¶ 31 (2011) ("TeleCuba Waiver Order").

International Settlements Policy Reform, IB Docket Nos. 11-80, 05-254, 09-10, RM 11322, Report and Order, 27 FCC Rcd 15521 (rel. Nov. 29, 2012) (eliminating the International Settlements Policy and applying a modified version to Cuba) ("International Settlements Policy Reform Order").

the terms and conditions therein and extend the waiver to it in an "Informative" as part of the Commission's Public Notice of actions taken on international telecommunications applications.

Should you have any questions with respect to this notification or require additional information, please do not hesitate to contact me.

Sincerely,

Douglas W. Everette

Counsel for IDT Domestic Telecom, Inc.

cc: David Krech, Associate Chief Policy Division, International Bureau