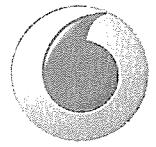


MAR 11 2016

FCC Mailroom



March 10, 2016

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

Re: Notification of Vodafone's Acceptance of Terms and Conditions for Waiver of the Benchmark Rate for Cuba, IB Docket No. 10-95; Vodafone US Inc., International Telecommunications Certificate ITC-214-20131028-00298

Dear Ms. De La Torre:

Vodafone US Inc. ("Vodafone")¹ files this letter to notify the Federal Communications Commission that it accepts the terms and conditions of the waiver of the benchmark policy applicable to U.S. carriers that seek to provide telecommunications services on a direct basis to Cuba as specified in the Commission's April 8, 2011 *TeleCuba Waiver Decision*,² and as revised by the Commission's *International Settlements Policy Reform Order*.³ The Commission's benchmark policy requires U.S. carriers to negotiate settlement rates with foreign carriers that do not exceed specific benchmark levels.

¹ With the Commission's recent action to remove Cuba from the exclusion list, *In re: Removing Cuba from the Exclusion List for International Section 214 Authorizations*, IB Docket No. 15-289 (Terminated), Order, DA 16-55 (rel. Jan. 15, 2016), Vodafone has authority to provide facilities-based and resold services to all international points, including Cuba. See *International Authorizations Granted*, Report No. TEL-01693, Public Notice, DA 14-1433, 29 FCC Rcd 11704 (rel. Oct. 2, 2014).

² *ICoconnect 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, DA 11-654, 26 FCC Rcd 5217 at ¶ 31 (2011) ("*TeleCuba Waiver Decision*").

³ *International Settlements Policy Reform*, IB Docket Nos. 11-80, 05-254, 09-10, RM 11322, Report and Order, FCC 12-145, 27 FCC Rcd 15521 (rel. Nov. 29, 2012) (generally eliminating the previous International Settlements Policy but applying a modified version to Cuba) ("*International Settlements Policy Reform Order*").

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Consistent with the process established in paragraph 33 of the *TeleCuba Waiver Decision*, Vodafone respectfully requests that the International Bureau acknowledge Vodafone's acceptance of those terms and conditions and extend the waiver to Vodafone through an "Informative" as part of the Commission's Public Notice of actions taken on international telecommunications applications.

Please contact me with any questions or concerns regarding this notification or if you require additional information.

Best regards,


Blair A. Rosenthal

Enc.: Certification

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

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CERTIFICATION

I, Blair Rosenthal, am the Assistant General Counsel of Vodafone US Inc. d/b/a Vodafone Americas. I certify that the representations made in the above letter to Mindel De La Torre, Chief of the International Bureau of the Federal Communications Commission concerning Vodafone's notice to the International Bureau that it accepts the terms and conditions of the waiver of the benchmark policy applicable to U.S. carriers seeking to provide telecommunications services to Cuba on a direct basis are true and complete to the best of my knowledge and belief.

Date: 3/10/2016


Blair Rosenthal

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