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July 31, 2013

VIA IBFS

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

**Re: Notice of Discontinuance of Service Pursuant to 47 C.F.R. § 63.19;
File No. ITC-214-20030728-00376**

Dear Ms. Dortch:

Pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.19(a) of the Commission's rules, 47 C.F.R. § 63.19(a), Tata Communications (America) Inc. ("Tata Communications") hereby provides notice of its plans to discontinue provision of its Trueroots international calling service.¹ Trueroots permits enterprise and mass-market customers to make international calls on a postpaid or prepaid basis, respectively. Trueroots currently is available in all parts of the U.S. excluding Alaska and Hawaii. The planned discontinuance thus will affect customers in all U.S. states other than Alaska and Hawaii. Tata Communications provides this international calling service pursuant to its international Section 214 authority, file number ITC-214-20030728-00376.

Tata Communications's discontinuance and notification procedures differ for enterprise and mass-market customers of Trueroots, due to differences in how Tata Communications provides the service to, and maintains information about, both types of customer. For example, Tata Communications enters into individually negotiated agreements with enterprise customers, but sells this service to mass-market customers via its Trueroots website. On the same date as this filing, Tata Communications notified enterprise customers that it will discontinue their service, consistent with the notice requirements under the applicable contracts. All enterprise customers have received 30 days' notice of the planned discontinuance. Tata Communications has physical mailing addresses for most Trueroots enterprise customers and thus provided written notification to those customers by U.S. mail. Tata Communications also sent the same

¹ Trueroots calling service is limited to international calls, and is not used to make calls within the U.S. Accordingly, the separate discontinuance procedures under 47 C.F.R. § 63.71 for domestic services do not apply.

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notice to all of its enterprise customers by e-mail. A copy of that notice is attached hereto at Attachment A.

On the same date as this filing, Tata Communications also notified current mass-market customers that, effective August 31, 2013, they will no longer be able to add usage to or renew existing Trueroots accounts. Customers will be able to make calls until they have exhausted their balances or their accounts expire, and Tata Communications will provide customer care service while any voucher remains valid and for three months afterward. Finally, with respect to prospective customers, on July 31, 2013, Tata Communications posted a notice on its website that it will discontinue future sales of its Trueroots service effective August 31, 2013.

As is common for providers of prepaid calling services, Tata Communications does not maintain physical mailing addresses for Trueroots mass-market customers, and it thus has had to rely on several other methods to notify such customers of the planned discontinuance. First, as of the date of this letter, Tata Communications provided notice by e-mail and on the Trueroots website, at <http://www.trueroots.us/>. A copy of that notice is attached hereto at Attachment B. Tata Communications also provides an oral notification regarding the planned discontinuance. Starting on July 31, 2013, Trueroots customers who use the service to make a call will hear the following message:

This notice is to inform you that new Trueroots accounts will no longer be available and customers will no longer be able to add usage to or renew existing accounts as of August 31, 2013. You may continue to make calls until you have exhausted your balance or your account expires. We will continue to provide customer care service while any voucher remains valid and for three months afterwards. Please visit our website for more information. Thank you.

The website text message regarding discontinuance is as follows:

Effective August 31, 2013, Tata Communications (America) Inc. ("Tata Communications") will no longer be selling its Trueroots international calling service, and customers will no longer be able to add usage to or renew existing Trueroots accounts. You may continue to make calls until you have exhausted your balance or your account expires. Tata Communications will continue to provide customer care service while any voucher remains valid and for three months afterward.

If you have any questions regarding this notice or wish to speak to a Tata Communications representative for any other reason, please click on the link below:
<http://www.trueroots.us/home/contact>.

In addition, Tata Communications has provided instructions to customer service representatives to address questions regarding the planned discontinuance. Specifically, Customer Service will be instructed to make clear that Tata Communications will comply with its service obligations pursuant to the terms under which service was purchased. Customer Service will further be instructed to clarify that although Tata Communications will no longer be providing the service

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to new customers or allowing existing customers to recharge vouchers as of August 31, 2013, Tata Communications will continue to provide Trueroots customer care service on existing vouchers, and that service will continue for three months after the voucher expires or the balance is zero. These alternate methods of notice are consistent with—if not more thorough than—those employed by other carriers that have, with Commission approval, discontinued the provision of similar prepaid calling services while lacking physical mailing addresses for customers.

If you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill
Brian W. Murray

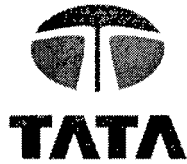
Counsel to Tata Communications (America) Inc.

Attachments

cc: Mindel De La Torre
Chief, International Bureau

David Krech
Associate Division Chief, Policy Division, International Bureau

Attachment A: Notices to Enterprise Customers



July 31, 2013

[REDACTED]

Attention: [REDACTED]

Re: Customer Notice Regarding Discontinuance of Trueroots International Calling Service

Dear [REDACTED]:

This notice concerns the planned discontinuance by Tata Communications (America) Inc. ("Tata Communications") of its Trueroots international calling service. Trueroots permits enterprise customers to make international calls on a postpaid basis. It is currently available in all parts of the United States excluding Alaska and Hawaii.

Pursuant to the agreement between Tata Communications and [REDACTED] dated [REDACTED], Tata Communications hereby provides notice that it will cease providing its Trueroots international calling service to [REDACTED], effective August 31, 2013.

The discontinuance of the Trueroots international calling service applies only to this particular service offering and does not affect any other products or services that you may purchase from us.

If you have any questions regarding this notice or wish to speak to a Tata Communications representative for any other reason, please click on the link at <http://www.trueroots.us/home/contact> or contact Trueroots customer care by phone (1-866-503-8765) between 9:00 am and 6:00 pm eastern time, Monday through Friday, or you can also email your inquiries to us any time at customer.care@trueroots.us, and we will respond to you within 24 hours of receiving the email. We thank you for your business and look forward to continuing to fulfill your communications needs with our other communications services and packages.

Sincerely,

Ramyang Pandya
Vice President – Service Management
Customer Service & Operations

TATA COMMUNICATIONS

TATA COMMUNICATIONS (AMERICA) INC.

Co. Reg. No. 3597870

2355 Dulles Corner Boulevard, Suite 700 Herndon, Virginia 20171. USA

www.tatacommunications.com

Attachment B: Notice to Mass Market Customers

July 31, 2013

Customer Notice Regarding Discontinuance of Trueroots International Calling Service

This notice concerns the planned discontinuance by Tata Communications (America) Inc. (“Tata Communications”) of its Trueroots international calling service. Trueroots permits customers to make international calls on a prepaid basis. It is currently available in all parts of the United States excluding Alaska and Hawaii.

Effective August 31, 2013, you will no longer be able to add usage to or renew existing Trueroots accounts. You may continue to make calls until you have exhausted your balance or your account expires. The discontinuation of the Trueroots international calling service applies only to this particular service offering and does not affect any other products or services that you may purchase from us.

Please be aware that Tata Communications will continue to provide customer care service while any voucher remains valid and for three months afterward.

If you have any questions regarding this notice or wish to speak to a Tata Communications representative for any other reason, please click on the link at: <http://www.trueroots.us/home/contact>.

We thank you for your business and look forward to continuing to fulfill your communications needs with our other communications services and packages.

Sincerely,

Ramyang Pandya
Vice President – Service Management
Customer Service & Operations