

**SEPARATE STATEMENT OF  
COMMISSIONER JAMES H. QUELLO**

**RE: Regulation of International Common Carrier Services  
(CC Docket No. 91-360)**

I am concurring with the majority in adopting this item. Today, the Commission is adopting a regulatory approach for classifying international carriers as either dominant or non-dominant. The route-by-route approach contained in this item should also be applied to AT&T, and I would have expanded the scope of this Order to cover AT&T. Pursuant to today's Order, foreign owned carriers operating in the U.S. can be regulated as non-dominant, while AT&T remains regulated as dominant. It is important to ensure that all carriers competing in the marketplace are provided with the opportunity to compete on a level playing field. I am also concerned that this item could increase the Commission's burden in reviewing complex cases concerning whether individual foreign carriers have market power. In addition, it raises serious questions regarding the Commission's ability to enforce our regulations. I concur in this item with the understanding that the regulatory classification of specific countries and individual carriers will be subject to full Commission review.

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