



**Comments of AT&T Global Network Services Sweden AB: PTS Third Consultation on  
*Draft Analysis of the Market for Mobile Call Termination (Dnr: 15-4802)***

**15 June 2016**

AT&T Global Network Services Sweden AB (“AT&T”) respectfully submits these comments in the third public consultation concerning *Draft Analysis of the Market for Mobile Call Termination (Market 2) According to Chapter 8, Sections 5 and 6 of the Law on Electronic Communications (2003:389)*, issued by PTS on 1 June 2016 (“the Consultation”).

AT&T welcomes the decision by PTS not to proceed with its earlier proposal to allow Swedish operators to charge rates that are higher than cost-oriented levels to terminate international calls originating in countries that are not Members of the European Economic Area (EEA), based on a so-called “reciprocal pricing” model. For the reasons outlined in AT&T’s comments in the second round of the public consultation,<sup>1</sup> AT&T fully supports the PTS conclusions<sup>2</sup> that, because the actual termination cost for calls originating outside the EEA is not higher than the for calls originating within the EEA, it is proportionate and reasonable to require operators with Significant Market Power in the relevant market to apply uniform pricing for call termination, irrespective of where the call originates. AT&T agrees with the PTS assessment that the application of uniform pricing for call termination by the SMP operator is the best course to avoid potential adverse competitive impacts on the market.

Respectfully submitted,

A handwritten signature in black ink that reads "Mike Corkerry".

Mike Corkerry  
Executive Director, EMEA Government Affairs  
AT&T

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<sup>1</sup> Available at: <http://www.pts.se/upload/Remisser/2016/Samtrafik%20o%20mobil%20lic/15-4802-ytrande-ATT-Comment.pdf>

<sup>2</sup> Consultation at Section 6.4.6