

31 MAR 1995

For Six Month Period Ending _____
(Insert date)

Name of Registrant **BT North America Inc.
Washington Office**

Registration No. 4566

Business Address of Registrant **North Building, Suite 725
601 Pennsylvania Avenue, N.W.
Washington, DC 20004**

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

- (1) Residence address Yes No
- (2) Citizenship Yes No
- (3) Occupation Yes No

(b) If an organization:

- (1) Name Yes No
- (2) Ownership or control Yes No
- (3) Branch offices Yes No

2. Explain fully all changes, if any, indicated in item 1.

**Name of Registrant has changed from BT Government Relations, Washington Office to
BT North America Inc., Washington Office.**

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name Position

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CRIMINAL DIVISION
Date Connection
Ended
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INTERNAL SECURITY
SECTION
REGISTRATION UNIT

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes No **Not Applicable.**

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name of foreign principal

Date of Termination

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes No

If yes, furnish following information:

Name and address of foreign principal

Date acquired

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

British Telecommunications plc (BT plc)

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes No

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment III - 11.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment III - 12.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes No

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
10/01/94 - 03/31/95	BT plc	Costs of operating BT North America Inc., Washington Office plus associated administrative expense	

NOTE: A substantial majority of monies received during this period was for services and activities that do not require registration under the Act.

\$ 502,164.97

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes No

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).
⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment IV - 15(a).

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes No

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
11/03/94	\$100.00	York for Governor	Myrth York
11/03/94	\$100.00	Ann Richards for Governor	Ann Richards

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propoganda? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propoganda include the use of any of the following:

- Radio or TV broadcasts
- Magazine or newspaper articles
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propoganda among any of the following groups:

- Public Officials
- Newspapers
- Libraries
- Legislators
- Editors
- Educational institutions
- Government agencies
- Civic groups or associations
- Nationality groups
- Other (specify) _____

21. What language was used in this political propoganda:

- English
- Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propoganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such political propoganda material with the statement required by Section 4(b) of the Act? Yes No

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propoganda material as required by Rule 401 under the Act? Yes No

VI-EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

- Exhibit A⁶ Yes No **Not Applicable.**
- Exhibit B⁷ Yes No

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and / of the supplemental statement? Yes No

Not Applicable.

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

James E. Graf II
James E. Graf II

Subscribed and sworn to before me at HOGAN & HARTSON, WASHINGTON, D.C.

this 28th day of April, 19 95

Brenda P. Cohen

(Signature of notary or other officer)

My Commission Expires
June 14, 1997

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form CRM-154, formerly Form OBD-64 - Supplemental Statement):

Yes _____ or No X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes X or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)


Signature

28 April 1995
Date

James E. Graf II
Please type or print name of signatory on the line above

President

Title

ATTACHMENT III - II.

11. Activities for and services rendered to British Telecommunications plc (BT plc):

- (1) Provided advice and information to BT plc and its subsidiaries with respect to U.S. telecommunications regulation and legislation.
- (2) Hosted reception recognizing appointment of James E. Graf II, President of BT North America Inc., 26 October 1994. Guest list, including U.S. Government officials and media representatives, attached hereto. [Entertainment expenditure - see response to 15.(a)].
- (3) Attended Center for Strategic & International Studies "UK Cable-Telco Tango: The Dance with Reality" luncheon forum featuring Sir Iain Vallance, 17 November 1994, Washington, D.C.
- (4) Attended British Embassy/British American Business Association Reception for induction of new BABA officers, 5 December 1994, Washington, D.C.
- (5) Attended Federal Communications Bar Association Chairman's Dinner, 5 December 1994, Washington, D.C. U.S. Government official attending as BT invited guest, Angela Wu, Confidential Assistant to Commissioner Rachelle B. Chong.
- (6) Attended British American Business Association Luncheon for Jeremy Greenstock, Minister, British Embassy, Washington, 7 December 1994, Washington, D.C.
- (7) Attended The European Institute dinner meeting with Members of the European Parliament Delegation to the United States, 15 December 1994, Washington, D.C.
- (8) Attended Federal Communications Bar Association Luncheon, 19 January 1995, w/FCC Commissioner Rachelle B. Chong, Washington, D.C.
- (9) Attended British American Business Association Luncheon w/Sir Leon Brittain, European Commission Trade Minister, 31 January 1995, Washington, D.C.
- (10) Attended Federal Communications Bar Association Reception honoring New Members of the House Committee on Commerce and New Members of the Senate Committee on Commerce, Science and Transportation, 15 February, 1995, Washington, D.C.
- (11) Attended Telecommunications Reports "LEC-IXC Conference," 13-15 March 1995, Washington, D.C.
- (12) Attended BT-sponsored Conference entitled "The Telecommunications Superhighway - Accelerating the Pace in Europe," 28 March 1995, Brussels, Belgium.

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CONFIRMED ATTENDEES**(97)**

Aker, Coburn
Baca, Rudy
Banks, Howard
Barton, Julie
Bernard, Keith
Beyerle, Shaazka
Bhalla, Gayatri
Brandon, George
Brown, Dale
Burdin, Sue
Cantrell, Frank
Chapman, Arlene
Chapman, Irv
Cikins, Sylvia
Collins, Kathleen, Esq.
Connolly, Michael
Connolly, Sue
Cowhey, Peter
Craig, Ellen
Curry, Jim
DeSoto, Kurt
Dougan, Ambassador Lady Diana
Dzubeck, Catherine
Dzubeck, Frank
Edwards, George
Esherick, Mark
Evans, Don
Fortnam, Tony
Frank, Carl
Friedman, Onerine
Friedman, William
Gaffigan, James
Geller, Henry
Goodman, Helen
Grapin, Jacqueline
Green, Peggy
Greenberg, Jack
Griffin, Joan
Gurwig, Kate
Haeffner, Bettina
Hammond, Mark
Hammond, Mrs. Mark
Hook, Lisa
Irving, Larry
Johnson, Charlie
Johnson, Mrs. Charlie
Keeney, Gina
Kovach, Gerald
Ladd, John
Lahrman, Lou
Lewis, James
Licht, Renee

AKER & ASSOCIATES
FCC
FORBES MAGAZINE
HOGAN & HARTSON
CABLE & WIRELESS
THE EUROPEAN INSTITUTE
HOUSE SUBCOMMITTEE ON TELECOMM. & FINANCE
TELECOMMUNICATIONS REPORTS
(Guest of spouse: Barbara Phillips)
EUROPE MAGAZINE
MCI
TMA
CNN
SENATE COMM. ON COMMERCE, SCIENCE & TRANS.
FCC
DANIEL J. EDELMAN, INC.
(Guest of spouse: Michael Connolly)
FCC
PODESTA ASSOCIATES, INC.

WILEY, REIN & FIELDING
CENTER FOR STRATEGIC & INT'L. STUDIES
COMMUNICATIONS NETWORK ARCHITECTS
COMMUNICATIONS NETWORK ARCHITECTS
A.T.I.S.
MCI
MCI
BRITISH EMBASSY
WILEY, REIN & FIELDING
(Guest of spouse: William Friedman)

AMERICAN HOTEL & MOTEL ASSOCIATION
MARKEL FOUNDATION
WORLD BANK
THE EUROPEAN INSTITUTE
FCC
CONCERT
CONCERT
INTERACTIVE AGE
BT MARINE

(Guest of spouse: Mark Hammond)
TIME-WARNER
DEPT. OF COMMERCE: NTIA
U.S. CABLESHIPS, INC
(Guest of spouse: Charlie Johnson)
FCC
MCI
(Guest of spouse)
HOUSE COMMITTEE ON ENERGY & COMMERCE
MCI
FCC

CONFIRMED ATTENDEES (continued...)

Mago, Jane	FCC
McMillan, The Hon. Alex	U.S. CONGRESS (committee on energy & commerce)
Monroe, Cortney	NORTHERN BUSINESS INFORMATION
Morgan, John	COMMUNICATIONS WORKERS OF AMERICA
Mundy, Oliver	BRITISH-AMERICAN BUSINESS ASSOCIATION
Murphy, Terence Roche	BRITISH-AMERICAN BUSINESS ASSOCIATION
Ness, The Hon. Susan	FCC
Nielsen, Wayne	BT MARINE
Obuchowski, Janice	FREEDOM TECHNOLOGIES, INC.
Oviatt, Frank	MCIPaoletta, Mark (Guest of spouse: Patricia Paoletta)
Paoletta, Patricia	FCC
Parsons, Gary	MCI
Permut, Philip	WILEY, REIN & FIELDING
Phillips, Barbara	AIRTOUCH COMMUNICATIONS
Phillips, Patricia	BRITISH EMBASSY
Quello, The Hon. James H.	FCC
Robinson, Kenneth	
Roseman, Walda	COMPASSROSE INTERNATIONAL, INC.
Sacks, Stephanie	BURSON-MARSTELLER
Sarvis, Aubrey	BELL ATLANTIC NETWORK SERVICES, INC.
Saylor, David	HOGAN & HARTSON
Scorce, John	MCI
Sherman, Patricia	(Guest of spouse: Terence Roche Murphy)
Shiver, Jube	LOS ANGELES TIMES
Slesinger, Cathy	NYNEX
Smith, James	AMERITECH
Snow, Anna	DELEGATION OF COMMISSION OF EUROPEAN COMM.
Spence, Colin	CONCERT
Stapleton, Donna	FCC
Stowe, Ron	PACIFIC TELESIS
Sugrue, Thomas	DEPT. OF COMMERCE: NTIA
Sussman, Michael	(Guest of spouse: Renee Licht)
Tagliatella, Carmine	MCI
Taylor, Leslie	LESLIE TAYLOR ASSOCIATES
Thyfault, Mary	INFORMATION WEEK
Valmassei, Christine	WASHINGTON TELECOM NEWSWIRE
Vinall, Antony	BRITISH EMBASSY
Vinall, Christine	(Guest of spouse: Antony Vinall)
Warren, Albert	WARREN PUBLISHING, INC.
Warren, Jennifer	FCC
Weckenmann, John	BURSON-MARSTELLER
Wheelock, Leslie	CONCERT
White, Ward	US Telephone Association
Wohlstetter, John	GTE
Worthington, John	MCI

CONFIRMED ATTENDEES (continued...)

**ATTENDEES WHO WERE NOT
ON RSVP LIST: (12)**

BT NORTH AMERICA (7)

Austin, Betty
Barron, Jim
Brown, Dave
Davidson, Beth
Graf, Jim
Keilty, Mike
Schaaf, Jeanne

ESTIMATED TOTAL ATTENDEES: 115

GUESTS ON RSVP LIST – ATTENDANCE UNCONFIRMED

Bunker, Ted	INVESTOR'S BUSINESS DAILY
Casserty, James	FCC
Courson, Paul	AP BROADCAST NEWSWIRE
Darr, Carol	DEPT. OF COMMERCE/OFFICE OF INT'L. AFFAIRS
Hofbauer, Diane	FCC
Hogan, Liz	MCI
Miller, Susan	ALLIANCE FOR TELECOMM. INDUSTRY SOLUTIONS
Milkman, Ruth	FCC
Moir, Brian	MOIR & HARDMAN
Morris, Baily	INTERNATIONAL ECONOMIC INSIGHTS
Pepper, Robert	FCC
Shawhan, Samuel	GTE
Stahl, Stephanie	INFORMATION WEEK

ACCEPTED INVITATION BUT DID NOT ATTEND

Carnevale, Mary Lu
Earnshaw, Chris
Kay, Jim
McGuire, Raymond
Oxley, The Hon. Michael G.
Oxley, Pat
Perry, Elizabeth Weil
Perry, Robert
Temple, Jonathan
Temple, Mrs. Jonathan
Vinokour, Jan

WALL STREET JOURNAL
CONCERT

BELLSOUTH
U.S. CONGRESS
(Guest of spouse: The Hon. Michael G. Oxley)
NATIONAL GALLERY OF ART
(Guest of spouse: Elizabeth Weil Perry)
BRITISH EMBASSY

BT NORTH AMERICA

ATTACHMENT III-12.

12. Political activities engaged in on behalf of British Telecommunications plc (BT plc):

- (1) Meeting on 4 October 1994 w/Scott Pearson, Office of the U. S. Trade Representative regarding international telecommunications trade issues.
- (2) Assisted in preparation and filing at FCC of BT North America Inc. Reply to AT&T's Supplemental Comments in Docket No. I-T-C-93-126. A copy of the Reply and attached service list, filed 15 November 1994, is included in the response to the attached printed matter questionnaire.
- (3) Meeting on 16 November 1994 among Susan Ness, Commissioner, FCC; James E. Graf II, President, BT North America Inc.; and Sir Iain Vallance (Chairman), Richard Marriott, and Alison Ritchie, BT, to discuss European telecommunications liberalization.
- (4) Meeting on 16 November 1994 among Rachele Chong, Commissioner, FCC; James E. Graf II, President, BT North America Inc.; and Sir Iain Vallance (Chairman), Richard Marriott, and Alison Ritchie, BT, to discuss European telecommunications liberalization.
- (5) Meeting on 16 November 1994 among Scott Blake Harris, Chief, FCC International Bureau; James E. Graf II, President, BT North America Inc.; and Sir Iain Vallance (Chairman), Richard Marriott, and Alison Ritchie, BT, to discuss European telecommunications liberalization.
- (6) Meeting on 17 November 1994 among Reed Hundt, FCC Chairman; James E. Graf II, President, BT North America; Sir Iain Vallance (Chairman), Richard Marriott, and Alison Ritchie, BT, to discuss European telecommunications liberalization.
- (7) Meeting on 17 November 1994 among Larry Irving, Assistant Secretary of Commerce for Communications & Information, NTIA, Department of Commerce; and James E. Graf II, President, BT North America; and Sir Iain Vallance (Chairman), Richard Marriott, and Alison Ritchie, BT, to discuss European telecommunications liberalization.
- (8) Transmitted 17 November 1994 a copy of an Address by Sir Iain Vallance, Chairman, BT, before the Center for Strategic & International Studies, Washington, D.C. entitled "How you Regulate Internationally in Converging Industry" to Scott Blake Harris, Chief, International Bureau, FCC. A copy of the address is included in the response to the attached printed matter questionnaire.
- (9) Assisted in preparation and filing at FCC of BT North America Inc. Comments in File No. ISP-95-002. A copy of the Comments and attached service list, filed 18 November 1994, is included in the response to the attached printed matter questionnaire.
- (10) Transmitted 23 November 1994 a copy of the speech by Sir Iain Vallance, Chairman, BT to the Keidanren, Tokyo, Japan, 4 October 1994 to Rachele B. Chong, FCC Commissioner. A copy of the speech is included in the response to the attached printed matter questionnaire.
- (11) Transmitted 6 December 1994 copy of Survey of the European business community undertaken by Harris Research on behalf of BTplc entitled "Attitudes towards Liberalisation" to Susan Ness, FCC Commissioner; Scott Blake Harris, Chief International Bureau, FCC; and Larry Irving, Assistant Secretary of Commerce for Communications & Information, NTIA, Department of Commerce. A copy of the Survey is included in the response to the attached printed matter questionnaire.
- (12) Meeting 12 January 1995 among Anne K. Bingaman, Assistant Attorney General, DOJ; James E. Graf II, President, BT North America Inc.; Colin Green, BT; and Janet McDavid, Hogan & Hartson, to discuss international telecommunications competition issues.

- (13) Meeting 12 January 1995 among Carl Willner, Antitrust Division, DOJ; James E. Graf II, President, BT North America Inc.; Colin Green, BT; and Janet McDavid, Hogan & Hartson, to discuss international telecommunications competition issues.
- (14) Meeting on 23 January 1995 among Diane Cornell and Jennifer Warren, FCC International Bureau; and James E. Graf II, President, BT North America Inc. to discuss FCC political international resale policies.
- (15) Meeting on 8 February 1995 between Jennifer Warren, FCC International Bureau, and James E. Graf II, President, BT North America Inc. to discuss international telecommunications regulatory issues.
- (16) Filed 14 March 1995 letter of BT North America Inc. to FCC Secretary in File No. I-T-C-93-126 and transmitted copy to Scott Blake Harris, Chief International Bureau, FCC. A copy of the letter is included in the response to the attached printed matter questionnaire.
- (17) Transmitted 29 March 1995 copies of Keynote Speech and Closing Remarks of Sir Iain Vallance, Chairman, BT, at BT-Sponsored Brussels Conference "The Telecommunication Superhighway - Accelerating the Pace in Europe," held 28 March 1995, Brussels, Belgium, to the following U.S. Government Officials:

FCC Chairman Reed Hundt
 FCC Commissioner James H. Quello
 FCC Commissioner Andrew C. Barrett
 FCC Commissioner Susan Ness
 FCC Commissioner Rachelle B. Chong
 William E. Kennard, General Counsel, FCC
 Robert M. Pepper, Chief, Office of Plans & Policy, FCC
 Kathleen Wallman, Chief, Common Carrier Bureau, FCC
 A. Richard Metzger, Jr., Deputy Chief, Common Carrier Bureau, FCC
 Jennifer Warren, Senior Legal Advisor, Office of the Bureau Chief, International Bureau, FCC
 Diane J. Cornell, Chief, Telecommunications Division, International Bureau, FCC
 Mindel De La Torre, Deputy Chief, Policy, Telecommunications Division, International Bureau, FCC
 George S. Li, Deputy Chief, Facilities, International Bureau, FCC
 Susan O'Connell, Acting Chief, Policy & Facilities Branch, Telecommunications Division, International Bureau, FCC
 Peter Cowhey, Chief, Multilateral & Development Branch, Telecommunications Division, International Bureau, FCC
 Kathleen J. Collins, Assistant Director, Telecommunications Division, International Bureau, FCC
 Mark Grannis, Special Assistant to the Director, Telecommunications Division, International Bureau, FCC
 Thomas M. Walsh, Assistant to Director, Telecommunications Division, International Bureau, FCC
 Larry Irving, Administrator, NTIA & Assistant Secretary of Commerce for Communications & Information, NTIA, Department of Commerce
 Thomas Sugrue, Deputy Assistant Secretary of Commerce for Communications & Information, NTIA, Department of Commerce
 Barbara Wellbury, Chief Counsel, Office of International Affairs, NTIA, Department of Commerce
 Carol Darr, Associate Administrator, Office of International Affairs, NTIA, Department of Commerce
 Susanne Radell Settle, Senior Policy Advisor, Office of International Affairs, NTIA, Department of Commerce
 Anne K. Bingaman, Assistant Attorney General, DOJ
 Diane P. Wood, Deputy Assistant Attorney General, DOJ
 Steven C. Sunshine, Deputy Assistant Attorney General, DOJ
 Constance K. Robinson, Chief of Operations, DOJ
 Jonathan Rich, Antitrust Division, DOJ
 Carl Willner, Antitrust Division, DOJ

Vonya B. McCann, Deputy Assistant Secretary of State for International Communications & Information Policy, Economic & Business Bureau, Department of State
Richard C. Beaird, Senior Deputy United States Coordinator, International Communications & Information Policy, Economic & Business Bureau, Department of State
Don Abelson, Assistant U.S. Trade Representative/Services, Investment, & Intellectual Property, Office of the USTR, Executive Office of the President
Patricia Paoletta, Director, Telecommunications Trade Policy, Office of the USTR, Executive Office of the President
Michael Nelson, Office of Science & Technology Policy, Executive Office of the President
Michael Froman, National Economic Council, Executive Office of the President

ATTACHMENT IV - 15.(a)

- 15.(a) If yes, set forth below in the required detail and separately for each foreign principal on account of such monies, including monies transmitted, if any, to each foreign principal.

Note: All monies disbursed or expended in connection with activity on behalf of British Telecommunications plc (BT plc) or its domestic U.S. companies. A substantial part of the monies disbursed or expended were in connection with non-registrable activities.

Date	To Whom	Purpose	Amount
10/01/94-03/31/95	Various Vendors	Office Expenses--including real property, equipment & vehicle leases; telephone; supplies; postage & overnight; documents, books & subscriptions; printing; registration fees; parking & taxis	\$ 225,377.27
10/01/94-03/31/95	James E. Graf II, Vice President Jeanne M. Schaaf, Assistant Vice President Betty R. Austin, Office Manager Beth Davidson, Secretary/Receptionist	Salaries, Fringe Benefits, Other Employee-related Expenses	180,214.17
10/01/94-03/31/95	Various vendors	Travel & Travel Meals Note: No U.S. Government officials or media representatives were guests.	10,697.58
10/01/94-03/31/95	Various vendors	Entertainment Meals/Business Conferences Note: No U.S. Government officials or media representatives were guests.	4,350.60
10/01/94-03/31/95	Hogan & Hartson Wiley, Rein & Fielding	Legal Services	4,261.61
10/01/94-03/31/95	Center for Strategic & International Studies	Donation for International Communications Studies Program luncheon forum with Sir Iain Vallance	5,000.00
10/01/94-03/31/95	Federal Communications Bar Association	Table at Federal Communications Bar Association Chairman's Dinner, 5 December 1994 Note: U.S. Government official attending as BT invited guest, Angela Wu, Confidential Assistant to Commissioner Rachelle B. Chong	700.00
10/01/94-03/31/95	The European Institute	Sponsorship of dinner meeting in honor of Alan Donnelly, Chairman of the European Parliament Delegation to the U.S. & 3 newly elected Members of Parliament. While U.S. Government officials or media representatives may have been dinner attendees, their attendance was not invited or solicited by BT plc. (Invoice date 12/30/94)	2,000.00
10/01/94-03/31/95	The European Institute	Corporate Regular Membership Contribution for 1995	5,000.00
10/01/94-03/31/95	The Aspen Institute	Sponsorship of The Aspen Institute's First Annual Roundtable on International Telecommunications to be held 7/26-30/95	15,000.00
10/01/94-03/31/95	Various Vendors	Reception recognizing appointment of James E. Graf II, President of BT North America Inc., 10/26/94 See Guest List included with entry, Item 11	49,563.74
		TOTAL	\$ 502,164.97