

From: Coulter, William [CoulterW@Coudert.com]
Sent: Monday, September 27, 2004 4:55 PM
To: John Kennedy
Subject: RE: FCC File # 0561-EX-ST-2004

France Telecom North America LLC, is a Delaware Limited Liability Company. It is owned by FTP Holdings, Inc, which also is a Delaware Company.

If you are asking about 310 of the Act?

I believe that 310(a) prohibits any radio license from being "granted to or held by" a foreign government or its representative. France Telecom North America is NOT this - there is no direct ownership.

Also, 310(b) governs only "common carrier, broadcast and aeronautical" licenses, I believe. France Telecom is NOT this. There is no common carrier use here. It is only OET experimental.

Finally, France is a WTO country where, I believe, the FCC has allowed even 310(b) ownership of "common carrier, broadcast and aeronautical" licenses by foreign entities - like Telenor and Comsat Mobile Communications.

I hope that thus answers your question. Sorry for the delay. Please call if you want me to confirm anything.

Bill

-----Original Message-----

From: OET Generic account [mailto:oetech@fccsun34w.fcc.gov]
Sent: Monday, September 27, 2004 4:00 PM
To: Coulter, William
Subject: FCC File # 0561-EX-ST-2004 [Reference Number: 3222]

Dear Mr. William Coulter:

Does the French government own the France Telecom North America LLC?