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Federal Communications Commission
Office of Secretary

24 July 2006

BY HAND DELIVERY

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

Re: Correction to Foreign Carrier Affiliation Notification of Level 3 Landing Station, Inc., FCC File No. FCN-NEW-20060127-00012, FRN 0007026347

Dear Ms. Dortch:

By this letter, Level 3 Landing Station, Inc. (“Level 3 Landing”), seeks to correct an error in the above-referenced foreign carrier affiliation notification made in connection with the acquisition by Level 3 Landing’s parent company of WilTel Communications Group, LLC. Level 3 Landing is not, in fact, affiliated with WilTel Communications (Cayman) Limited (“WilTel Netherlands”)—a carrier organized under the laws of the Cayman Islands but authorized to provide telecommunications services in the Netherlands—within the meaning of 47 C.F.R. § 1.768 of the Commission’s rules.

Level 3 Landing is a cable landing licensee for the Yellow submarine cable system.¹ As Level 3 Landing does not provide international telecommunications on a common-carrier basis, it does not hold an international Section 214 authorization from the Commission, and it is not required to make foreign carrier affiliation notifications pursuant to 47 C.F.R. § 63.11, which applies only to common carriers.

¹ See Level 3 International, Inc., Cable Landing License, 15 FCC Rcd. 842 (2000) (“*Yellow Cable Landing License*”). The cable landing license was later assigned to Level 3 Landing. See FCC File No. SCL-ASG-20000310-00008.

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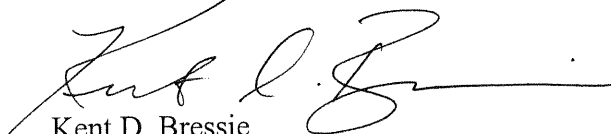
Instead, Level 3 Landing is required only to make foreign carrier affiliation notifications under 47 C.F.R. § 1.768. That rule section requires a cable landing licensee to make notifications for affiliations with foreign carriers in destination markets in which the licensed submarine cable lands.² The Yellow system lands only in Bellport and Brookhaven, New York, U.S.A., and in Bude and White Sands, U.K.³ It does not land in the Netherlands.

WilTel Netherlands is authorized to provide telecommunications services in the Netherlands—a country in which the Yellow system does not land—but not the United States or the United Kingdom. So although WilTel Netherlands and Level 3 Landing have the same parent company, Level 3 Landing is not affiliated with WilTel Netherlands within the meaning of 47 C.F.R. § 1.768.⁴

Level 3 Landing therefore requests that the Commission disregard the references to WilTel Netherlands in Level 3 Landing's January 27, 2006, foreign carrier affiliation notification, and correct its files to note no foreign affiliation—within the meaning of 47 C.F.R. § 1.768—exists between Level 3 Landing and WilTel Netherlands.

Should you have any questions regarding this correction, please contact me by telephone at +1 202 730 1337 or by e-mail at kbressie@harriswiltshire.com

Respectfully submitted,



Kent D. Bressie
Counsel for Level 3 Landing Station, Inc.

cc: David Krech
Susan O'Connell

² See 47 C.F.R. § 1.768 (stating that “[a]ny entity that is licensed by the Commission (‘licensee’) to land or operate a submarine cable landing in a particular foreign destination market that becomes or seeks to become, affiliated with a foreign carrier that is authorized to operate in that market, including an entity that owns or controls a cable landing station in that market, shall notify the Commission of that affiliation.”).

³ See *Yellow Cable Landing License*, 15 FCC Rcd. at 846 ¶ 13 (noting U.S. and U.K. landings); FCC File No. SCL-LPN-20000211-00004 (notifying the Commission of the specific U.K. landing locations).

⁴ Please note that Level 3 Landing remains affiliated with WilTel Communications UK Limited.