



Federal Communications Commission

FEDERAL COMMUNICATIONS COMMISSION FCC FOREIGN CARRIER AFFILIATIONS NOTIFICATION

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Menu

CARRIER INFORMATION

CONFIDENTIALITY: Carriers filing foreign carrier affiliation notifications pursuant to Section 63.11 (a) of the Rules, 47 C.F.R. §63.11(a), and requesting confidential treatment for the first twenty days pursuant to Sections 63.11(i) and 0.459 of the Rules, 47 C.F.R. §§63.11(i) and 0.459, should not file this form electronically, but instead, should file this form and the required attachments manually. Please send the manual submission to:

Secretary
Room TW-B204F
445 12th Street, SW
Washington, DC 20554

REMINDER: Carriers filing foreign carrier affiliation notifications are reminded to review the requirements in Section 63.11 of the Rules, 47 C.F.R. §63.11. See [FACT SHEET](#)

Note: Use only standard punctuation. Please do not use special characters - such as ';' - in any of the fields below!

Enter a description of this notification to identify it on the main menu:

BellSouth Long Distance FCN

1. Carrier

Name:	BellSouth Long Distance, Inc.	Phone Number:	770-352-3077
DBA Name:		Fax Number:	678-443-3470
Street:	400 Perimeter Center Terrace Suite 350	E-Mail:	mary.dennis@bellsouth.com
City:	Atlanta	State:	GA
Country:	USA	Zipcode:	30346 -1907
Attention:	Ms Mary J Dennis		

2. Contact

Name:	Mr. James J.R. Talbot - Sr. Attorney	Phone Number:	(202) 457-3048
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Company: AT&T Services, Inc.	Fax Number: (832) 213-0300
Street: 1120 Twentieth Street, NW Suite 1000	E-Mail: jjtalbot@att.com
City: Washington	State: DC
Country: USA	Zipcode: 20036 -
Attention:	Relationship: Legal Counsel

3. Place of Incorporation of Carrier Delaware

4. Other Company(ies) and Place(s) of Incorporation

5. Country or Countries for which carrier is notifying the Commission of an affiliation. See Attachment 1

6. Is there an accompanying Transfer of Control or Assignment Application pursuant to Section 63.18(e)(3) of the Rules, 47 C.F.R. §63.18(e)(3), to this foreign carrier affiliation notification? Yes No

7. If the answer to question 6 is yes, please provide the date of filing of the Transfer of Control or Assignment Application.
3/31/2006

8. Is this foreign carrier affiliation notification being filed as a prior notification pursuant to Section 63.11(a) or as a post notification pursuant to Section 63.11(b)-(c)? Prior Post

9. If this foreign carrier affiliation notification is being filed as a prior notification pursuant to Section 63.11(a)(1) or (2) of the Rules, 47 C.F.R. §§63.11(a)(1) or (2), is this filing being made at least forty-five days prior to the consummation of the acquisition? If the answer to this question is no, include in an Attachment (use Attachment 1 below) a statement explaining the reason for non-compliance with the Section 63.11(a) filing requirement. Yes No N/A

10. If this foreign carrier affiliation notification is being filed as a post notification pursuant to Section 63.11(b)-(c) of the Rules, 47 C.F.R. §63.11(b)-(c), is this filing being made within thirty days after consummation of the acquisition? If the answer to this question is no, include in an Attachment (use Attachment 1 below) a statement explaining the reason for non-compliance with the Section 63.11(c) filing requirement. Yes No N/A

11. If the foreign carrier affiliation notification is being filed as a post notification pursuant to Section 63.11(c) of the Rules, 47 C.F.R. §63.11(c), are you relying upon an exception in Section 63.11(b)? Yes No N/A

12. If the answer to question 11 is yes, please certify to one or more of the following questions as applicable for each carrier and destination market for which notification is being made (see Section 63.11(b)):

- a. Has the Commission previously determined in an adjudication that the foreign carrier(s) lacks market power in any destination market being notified in this filing? If the answer is yes, please provide the citation(s) to the decision(s) in an Attachment (use Attachment 1 below). Yes No N/A
- b. Does the foreign carrier(s) own facilities in any destination market(s) being notified in this filing (see Section 63.11(b)(1)(ii) for a definition of "facilities")? If the answer is yes, please specify the carrier(s) and destination market(s) being notified in this filing in an attachment (use Attachment 1 below). Yes No N/A
- c. Is the foreign carrier authorized to operate in a WTO Member?
 - 1. If the foreign carrier is authorized to operate in a WTO Member,

is the authorized carrier making this filing demonstrating that it is entitled to retain non-dominant classification on the newly affiliated route pursuant to Section 63.10 of the Rules, 47 C.F.R. §63.10? If so, please provide the necessary demonstration in an Attachment (use Attachment 1 below). Yes No N/A

2. If the foreign carrier is authorized to operate in a WTO Member, is the authorized carrier agreeing to comply with the dominant carrier safeguards contained in Section 63.10 of the Rules, 47 C.F.R. §63.10, effective upon the acquisition of the affiliation? Yes No Undefined field (dominant_carrier_safeguards_sw:3)

13. If the foreign carrier affiliation notification is being filed as a prior notification pursuant to Section 63.11(a) of the Rules, 47 C.F.R. §63.11(a), is the foreign carrier authorized to operate in a non-WTO Member country? Yes No N/A

14. If the answer to question 13 is yes, is the authorized carrier making the required showing that the foreign carrier lacks market power in the non-WTO Member country (see Section 63.18(k)(2), 47 C.F.R. §63.18(k)(2)) or, alternatively, the Effective Competitive Opportunities showing specified in Section 63.18(k)(3) of the Rules, 47 C.F.R. §63.18(k)(3)? If yes, please provide the supporting information in an Attachment (use Attachment 1 below). Yes No N/A

15. If the answer to question 13 is yes and the answer to question 14 is no, you may provide information in an Attachment (use Attachment 1 below) to demonstrate it continues to serve the public interest for you to operate on the route for which you propose to acquire an affiliation with the non-WTO foreign carrier. (See Section 63.11(g)(2)).

16. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, does the authorized carrier request continued regulation as a non-dominant international carrier pursuant to Section 63.10 of the Rules, 47 C.F.R. §63.10? If yes, include an Attachment (use Attachment 1 below) stating how the carrier qualifies for non-dominant classification pursuant to this section. Yes No

17. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, provide in an Attachment (use Attachment 1 below) the name of the newly affiliated foreign carrier(s) and the country or countries in which it is authorized to provide telecommunications services to the public.

18. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, state in an Attachment (use Attachment 1 below) what services the authorized carrier(s) making this filing is authorized to provide to each country named in response to question 17 and the FCC file numbers under which each such authorization was granted.

19. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, state in an Attachment (use Attachment 1 below) which, if any, of the countries the authorized carrier making this filing serves solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

20. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, provide in an Attachment (use Attachment 1 below) the name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the authorized carrier making this filing, and the percentage of equity owned by each of those entities to the nearest one percent.

21. Regardless of whether the foreign carrier affiliation notification is filed as a prior or post notification, provide the name of any interlocking directorates, as defined in Section 63.09(g) of the Rules, 47 C.F.R. §63.09(g), with each foreign carrier named in the notification.

22. By checking Yes, the carrier certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route. Yes No

23. By checking Yes, the carrier certifies that it shall maintain the continuing accuracy of information provided pursuant to Section 63.11 of the Rules, 47 C.F.R. §63.11, for a period of forty-five days after the filing of this form. In addition, the applicant certifies that it shall immediately inform the Commission if at any time, not limited to forty-five days, the representations in the "special concessions" certification referenced in question 22 are no Yes No

longer accurate.

CERTIFICATION

24. Typed Name of Person Signing James J.R. Talbot	25. Title of Person Signing Sr. Attorney
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WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

26. 1: Attachment 1	2: Attachment	3: Attachment
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FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0686.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Menu

ATTACHMENT 1

Pursuant to Section 63.11 of the Commission's rules, BellSouth International, LLC ("BSI") and BellSouth Long Distance, Inc. ("BSLD") are submitting foreign carrier affiliation notifications to report their affiliations with the foreign carrier affiliates of AT&T Inc. ("AT&T") in the countries listed in the response to Question 5 below. These new affiliations are the result of the consummation of AT&T's merger with BellSouth Corporation, which occurred on December 29, 2006. See Press Release, AT&T Inc., *AT&T and BellSouth Join to Create a Premier Global Communications Company* (Dec. 29, 2006), available at <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=22860>. This Attachment provides the responses to Questions 5, 12 and 16-21 of the Foreign Carrier Affiliations Notification Forms submitted herewith by BSI and BSLD.

Question 5

<u>Affiliate Name</u>	<u>Country</u>
AT&T Communications Services Argentina S.R.L.	Argentina
AT&T Global Network Services Australia Pty. Ltd.	Australia
AT&T Global Network Services Austria GmbH	Austria
AT&T Global Network Services Belgium Luxembourg S.P.R.L.	Belgium
AT&T Global Network Services Brazil Ltda.	Brazil
AT&T Global Network Services Bulgaria Ltd.	Bulgaria
AT&T Global Services Canada Co.	Canada
AT&T Enterprises Canada Co.	Canada
AT&T Chile SA	Chile
AT&T Red Global Telecommunications Ltda.	Chile
AT&T Global Network Services Colombia (Ltda.)	Colombia
AT&T Global Network Services Hrvatska d.o.o.	Croatia
AT&T Global Network Services Czech Republic s.r.o.	Czech Republic
AT&T Global Network Services Ltd.	Cyprus
AT&T Global Network Services Danmark ApS	Denmark
AT&T Global Network Services Ecuador Cia. Ltda.	Ecuador
AT&T Global Network Services Estonia Ou	Estonia
AT&T Global Network Services Finland Oy	Finland
AT&T Global Network Services France SAS	France
AT&T Global Network Services Deutschland GmbH	Germany
AT&T Global Network Services (Hellas) E.P.E. (Limited)	Greece
AT&T Servicios de Comunicaciones de Guatemala SA	Guatemala
AT&T Global Network Services Hong Kong Limited	Hong Kong
AT&T Global Network Services Hungary Kft	Hungary
AT&T Global Network Services Ireland Limited	Ireland
AT&T Global Network Services International Inc.	Israel

AT&T Global Network Services Italia S.p.A.	Italy
AT&T Japan Ltd.	Japan
AT&T Global Services KK	Japan
AT&T Communications Services (Japan) Ltd.	Japan
AT&T GNS Korea Limited (Yuhan Hoesa)	Korea
AT&T Global Network Services Latvia SIA	Latvia
UAB AT&T Lietuva (Lithuania)	Lithuania
AT&T Global Network Services Belgium Luxembourg S.P.R.L. (Branch Office)	Luxembourg
Alestra, S. de R.L. de C.V.	Mexico
AT&T Global Network Services Nederland B.V.	Netherlands
AT&T Global Network Services International Inc.	New Zealand
AT&T Global Network Services Norge LLC	Norway
AT&T Global Network Services International Inc.	Pakistan
AT&T Communications Services de Panama S. de R.L.	Panama
AT&T Global Network Services del Peru S.R.L.	Peru
AT&T Global Network Services Polska Sp. z.o.o.	Poland
AT&T Serviços de Telecomunicações, Sociedade Unipessoal, Lda.	Portugal
AT&T Global Network Services Romania S.R.L.	Romania
AT&T Global Network Services OOO	Russia
AT&T Worldwide Telecommunications Services Singapore Pte Ltd.	Singapore
AT&T Global Network Services Slovakia s.r.o.	Slovakia
AT&T Globalne Omrezne Storitve d.o.o.	Slovenia
AT&T Global Network Services Espana, S.L.	Spain
AT&T Global Network Services Sweden AB	Sweden
AT&T Global Network Services Switzerland GmbH	Switzerland
AT&T Global Network Services Taiwan Ltd.	Taiwan
AT&T Global İletişim Servisleri Limited Şirketi Ltd. STI	Turkey
AT&T Global Network Services (UK) B.V.	United Kingdom
AT&T Global Network Services Venezuela LLC	Venezuela

Question 12

In response to Question 12.a., the Commission has determined that the above-listed foreign affiliates do not possess market power on the foreign end of a U.S. international route. *SBC Communications Inc. and AT&T Corp. Applications for Transfer of Control*, 20 FCC Rcd. 18290, ¶¶ 168-170 (2005).

In response to Questions 12.b. & c., BSI and BSLD certify that all of the above-listed countries, with the exception of Russia, are WTO member countries.¹ BSLD and BSI further certify that their foreign carrier affiliate in Russia, AT&T Global Network Services OOO, owns no facilities in that destination market. Although some of the above-listed foreign carrier affiliates in WTO member countries own facilities in their respective destination markets, the Applicants are not relying on the absence of facilities ownership in destination markets to support post-notification treatment for their affiliations with carriers in WTO member countries.

As demonstrated below in response to Question 16, BSI and BSLD are entitled to retain non-dominant classification on these newly affiliated routes pursuant to Section 63.10 of the Commission's rules.

Question 16

Pursuant to Section 63.10 of the Commission's rules, 47 C.F.R. Sect. 63.10, BSI and BSLD qualify for continued non-dominant classification on the routes between the U.S. and the above-listed foreign countries because their new affiliates in these countries have no market power on the foreign end of those routes. All the above-listed foreign affiliates have market shares under 50 percent in all relevant markets on the foreign end of U.S. routes to these countries, including the international transport and local access markets in each such country. Additionally, none of the above-listed foreign affiliates is listed on the Commission's List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets. See Public Notice, *The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Jan. 26, 2007, http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-07-233A1.pdf. Accordingly, pursuant to Section 63.10(a)(3), BSI and BSLD are presumptively classified as non-dominant on these routes.

Question 17

The names of the foreign carrier affiliates and the countries in which they are authorized to provide telecommunications services to the public are listed on pages 1-2 of this Attachment.

Question 18

BSI holds facilities-based and resale authority for service originating out of region (ITC-214-19971017-00638) and was a part of the consortium that received Section 214 authority to construct, acquire, and operate capacity in the MAYA-1 cable. See ITC-214-19990325-00153.

¹ See http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (listing WTO Members as of January 11, 2007).

BSLD holds global or limited global facilities-based and resale Section 214 authorizations for service originating both in region, *see, e.g.*, ITC-214-20020628-00328 (facilities-based and resale services originating in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina), and out of region, *see, e.g.*, ITC-214-19990218-00144 (facilities-based and resale services originating out of region); ITC-214-19970122-00039 (resale services originating out of region).

Question 19

BSI and BSLD do not provide services to any of the above-listed countries solely through the resale of the international switched services of unaffiliated United States facilities-based carriers.

Question 20

BSI is a wholly-owned subsidiary of BellSouth Advertising & Publishing Corporation, which is a wholly-owned subsidiary of BellSouth Enterprises, Inc., which is a wholly-owned subsidiary of BellSouth Corporation, which is a wholly-owned subsidiary of AT&T Inc.

BSLD is a wholly-owned subsidiary of BellSouth Corporation, which is a wholly-owned subsidiary of AT&T Inc.

AT&T Inc. is a publicly traded corporation whose stock is widely held by the public. No person or entity holds a ten percent or greater ownership interest in AT&T Inc.

The addresses, citizenships and principal businesses of AT&T Inc., BellSouth Advertising & Publishing Corporation, BellSouth Enterprises, Inc., and BellSouth Corporation are as follows:

AT&T Inc.
175 East Houston Street
San Antonio, Texas 78205
Citizenship: Delaware
Principal business: Holding Company

BellSouth Advertising & Publishing Corporation
2247 Northlake Parkway
Atlanta, Georgia 30084
Citizenship: Georgia
Principal business: Advertising and Publishing

BellSouth Enterprises, Inc.
1155 Peachtree Street, N.E.
Atlanta, Georgia 30309
Citizenship: Georgia
Principal business: Holding Company

BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, Georgia 30309
Citizenship: Georgia
Principal business: Holding Company

Question 21

BSI has no interlocking directorates as defined in Section 63.09(g) of the Commission's rules with any of the above-listed foreign affiliates.

BSLD has interlocking directorates with AT&T Global Network Services International Inc., which is a carrier in Israel, New Zealand, and Pakistan; AT&T Global Network Services Norge LLC, which is a carrier in Norway; and AT&T Global Network Services Venezuela LLC, which is a carrier in Venezuela. Charles Allen, Treasurer of BSLD, is a director and Treasurer of AT&T Global Network Services International Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC. Additionally, Thomas S. Clemens and Kevin T. Fix, who are Assistant Treasurers of BSLD, hold the same positions with AT&T Global Network Services International Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC.