

**ATTACHMENT 1**

**Foreign Carrier Affiliation Notification**

Pursuant to Section 63.11 of the Commission's rules, Global Crossing Americas Solutions, Inc. ("GCAS") and Global Crossing North America, Inc. ("GCNA") hereby submit this foreign carrier affiliation notification, relating to an affiliation with the following two foreign carriers: Mfone Co., Ltd ("Mfone") in Cambodia, and Lao Telecommunications Company Limited ("LTC") in Laos. Mfone is a direct, wholly owned subsidiary of Shenington Investments Pte Ltd ("Shenington"); Shenington also holds a 49 percent interest in LTC. GCAS and GCNA became affiliated with Mfone and LTC when Singapore Technologies Telemedia Pte Ltd ("ST Telemedia") acquired an indirect interest in Shenington.

**Answer to Question 10**

ST Telemedia acquired its indirect interest in Mfone and LTC when its indirect subsidiary, Asia Mobile Holdings Pte. Ltd. ("AMH"), acquired a 49 percent interest in Shenington, in a transaction that closed on July 25, 2007.<sup>1</sup> GCAS and GCNA recently determined that foreign carrier affiliation notifications had inadvertently not been submitted pursuant to Section 63.11(c) of the Commission's rule, 47 C.F.R. § 63.11(c). Upon discovering this omission, GCAS and GCNA proceeded to prepare this notification.<sup>2</sup>

**Answers to Questions 12 and 16**

Cambodia is a World Trade Organization ("WTO") Member country. Laos is not yet a WTO Member country, although its ascension to membership is in process.

Mfone owns facilities in Cambodia; LTC owns facilities in Laos.

With respect to the U.S.-Cambodia route, GCAS and GCNA presumptively qualify for non-dominant classification pursuant to Section 63.10(a)(3) of the Commission's rules. Mfone is a wireless communications provider that lacks a 50 percent market share in Cambodia and is not listed on the Commission's List of Foreign Telecommunications Carriers That Are Presumed to Possess Market Power in Foreign Telecommunications Markets.<sup>3</sup>

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<sup>1</sup> The remaining 51 percent interest in Shenington is held by Thaicom Public Company Limited ("Thaicom"). Temasek Holdings (Private) Limited holds indirect interests in Shenington through both ST Telemedia and Thaicom, which when combined result in the affiliations addressed by this notice.

<sup>2</sup> Neither Mfone nor LTC holds Commission licenses, and thus, no Commission approval of ST Telemedia's investments was required.

<sup>3</sup> *See 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*, Public Notice, DA 07-233, at 3 (rel. Jan. 26, 2007).

With respect to the U.S.-Laos route, the Commission presumes LTC to be dominant in Laos, as it is listed on the Commission’s List of Foreign Telecommunications Carriers That Are Presumed to Possess Market Power in Foreign Telecommunications Markets.<sup>4</sup> GCAS and GCNA agree that, with respect to the U.S.-Laos route, they will comply with the dominant carrier safeguards contained in Section 63.10 of the Commission’s rules, subject to possible reclassification at a later date.

Accordingly, the instant notification is eligible for the post-consummation notification procedures pursuant to Section 63.11(b) of the Commission’s rules.

**Answer to Question 17**

Mfone is authorized to provide communications services in Cambodia. LTC is authorized to provide communications services in Laos.

**Answer to Question 18**

GCAS and GCNA hold the following international section 214 authorizations:

Licensee	Authorizations
Global Crossing Americas Solutions, Inc.	ITC-95-434, ITC-95-485, ITC-97-399, ITC-98-342, ITC-98-342A
Global Crossing North America, Inc.	ITC-214-19980520-00334 <sup>5</sup>

**Answer to Question 19**

GCAS and GCNA are authorized to provide global facilities-based and/or resold international switched services between the U.S. and all foreign points, including Cambodia and Laos.

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<sup>4</sup> See *id.* at 6.

<sup>5</sup> This international section 214 authority was recently assigned to GCNA by its affiliate, International Optical Network L.L.C. See Public Notice, *International Authorizations Granted*, DA No. 10-610, Report No. TEL-01420, at 2 (rel. Apr. 8, 2010) (File No. ITC-ASG-20100315-00107). GCNA recently notified the Commission that four of its subsidiaries—Budget Call Long Distance, Inc., Global Crossing Bandwidth, Inc., Global Crossing North American Networks, Inc., and Global Crossing Telecommunications, Inc.—had surrendered the international section 214 authorizations held in their own names and had begun to operate pursuant to GCNA’s newly assigned authority. In addition, GCNA’s affiliate Racal Telecommunications Inc. recently surrendered its international section 214 authority.

## **Answer to Question 20**

GCAS and GCNA are indirect subsidiaries of Global Crossing Holdings Limited (whose ownership is described below). More specifically, the following are the names, addresses, citizenship, and principal businesses of any person or entity that directly or indirectly owns at least ten percent of the equity of GCAS and GCNA:

**Global Crossing North America Inc. (“GCNA”)**

Address: 225 Kenneth Drive, Rochester, New York 14623-4277

Citizenship: New York

Principal Business: Holding company

Relationship: 100 percent owner of ALC Communications

**Global Crossing North American Holdings, Inc. (“GCNAH”)**

Address: 225 Kenneth Drive, Rochester, New York 14623-4277

Citizenship: Delaware

Principal Business: Holding company

Relationship: 100 percent owner of GCNA

**Global Crossing Holdings Limited**

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: Holding company

Relationship: 100 percent owner of GCNAH

**Global Crossing Limited (“GCL”)**

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: Telecommunications

Relationship: 100 percent owner of Global Crossing Holdings Limited

**STT Crossing Ltd. (“STT Crossing”)**

Address: 10 Frere Felix de Valois Street, Port Louis, Mauritius

Citizenship: Mauritius

Principal Business: Holding company

Relationship: 60.39 percent owner of GCL

**Fidelity Management & Research Co.**

Address: 82 Devonshire Street, Boston, Massachusetts 02109

Citizenship: United States

Principal Business: Investment firm

Relationship: 14.89 percent owner of GCL

**STT Communications Ltd (“STT Communications”)**

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 100 percent owner of STT Crossing

**Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”)**

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 100 percent owner of STT Communications<sup>6</sup>

**Temasek Holdings (Private) Limited**

Address: 60B Orchard Road #06-18, The Atrium@Orchard, Singapore 238891

Citizenship: Singapore

Principal Business: Investment holding company

Relationship: 100 percent owner of ST Telemedia

Global Crossing Holdings Limited holds its interest in GCAS through the following intermediate companies:

**Impsat Fiber Networks, Inc.**

Address: Elvira Rawson de Dellepiane, 150 Piso 8, C1107 BCA, Buenos Aires, Argentina

Citizenship: United Kingdom

Principal Business: Holding company

Relationship: 100 percent owner of Global Crossing Americas Solutions, Inc.

**GC Impsat Holdings II Ltd.**

Address: 1 London Bridge, London SE1 9BG, England

Citizenship: United Kingdom

Principal Business: Holding company

Relationship: 100 percent owner of Impsat Fiber Networks, Inc.

**GC Impsat Holdings I Plc**

Address: 1 London Bridge, London SE1 9BG, England

Citizenship: United Kingdom

Principal Business: Holding company

Relationship: 100 percent owner of GC Impsat Holdings II Ltd.

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<sup>6</sup> Of this amount, 0.01 percent of STT Communications’ shares are held by current members of ST Telemedia’s management, all of whom are citizens of Singapore, as nominees of and in trust for ST Telemedia.

**GC Impsat Holdings Nederlands B.V.**

Address: 1 London Bridge, London SE1 9BG, England

Citizenship: Netherlands

Principal Business: Holding company

Relationship: 100 percent owner of GC Impsat Holdings I Plc

**Answer to Question 21**

There are no interlocking directorates between GCAS or GCNA, and Mfone or LTC. Mr. Anupam Garg, Senior Vice President of International Business Development for ST Telemedia, is a Director for both Mfone and LTC. In addition, Mr. Kek Soon Eng, Senior Vice President of Management of Investee Companies for ST Telemedia, is a Director of Mfone.