

Attachment 1

Question 5 – Countries of affiliation

By this filing, Reach Ltd. (“REACH”) notifies the FCC of affiliations with foreign carriers in the British Virgin Islands; Germany; Greece; Hong Kong; Japan; the Netherlands; Singapore; Thailand; and the United Kingdom.

Question 10 – Late notification

As appropriate, REACH requests a waiver of the requirement that carriers notify the FCC of foreign affiliations within 30 days after closing. REACH’s failure to file within the specified timeframe was inadvertent in each instance. REACH notes that it clearly qualifies for continued nondominant treatment on all of the notified routes except Hong Kong, and that it is already subject to dominant carrier treatment on the Hong Kong route. REACH apologizes for any inconvenience resulting from its failure to file this notification in a timely manner.

Question 12.c.1 – Non-dominant carrier demonstration

REACH currently regulated as non-dominant on the British Virgin Islands, Germany, Greece, Japan, Netherlands, Singapore, Thailand, and United Kingdom routes. REACH asks that it continue to be regulated as a non-dominant carrier on these routes. Continued non-dominant treatment is appropriate on these routes because on each of these routes, REACH’s foreign carrier affiliates lack 50 percent market share in the international transport and local access markets in their home countries. Currently, in their respective countries, each of these carriers either has not yet begun providing service or, if providing service: (1) controls less than 25 percent of the market; (2) competes against at least one other carrier that controls a majority of the international telecommunications market; and (3) lacks market power or facilities that would permit it to set market prices, control services or facilities, control market entry, or discriminate against unaffiliated U.S. carriers.

Question 12.c.2 – Agreement to dominant carrier treatment

REACH is currently subject to dominant carrier treatment on the U.S.-Hong Kong route, and accepts dominant carrier treatment with respect to the Hong Kong foreign carrier affiliation that is the subject of this Notification.

Question 16 – Appropriateness of continued non-dominant treatment

Continued non-dominant treatment is appropriate for REACH on the British Virgin Islands, Germany, Greece, Japan, Netherlands, Singapore, Thailand, and United Kingdom routes since REACH’s affiliates on these routes lack market power in the international transport and local access markets in their home countries, as demonstrated in the answer to Question 12.c.1 above.

Question 17 – Foreign carrier affiliates that are the subject of this Notification

By this Notification, REACH advises the FCC that REACH is affiliated with the following foreign carriers:

Name of the Affiliated Carrier:	Country:	Date of Affiliation:
BtN Access Limited	British Virgin Islands	July 12, 2006
PCCW Global (Germany) GmbH	Germany	March 9, 2009
PCCW Global (Hellas) Telecommunications Services S.A.	Greece	February 26, 2009
Hong Kong Telecommunications (HKT) Limited	Hong Kong	January 20, 2009
PCCW Global (HK) Limited	Hong Kong	July 14, 2006
PCCW Global Limited	Hong Kong	July 14, 2006
PCCW Mobile HK Limited	Hong Kong	March 21, 2007
PCCW-HKT Network Services Limited	Hong Kong	July 14, 2006
PCCW Global Pte. Ltd. (Japan Branch)	Japan	July 26, 2006
PCCW Global B.V.	Netherlands	August 4, 2008
HKT Global (Singapore) Pte Ltd	Singapore	April 19, 2010
PCCW Global Pte. Ltd.	Singapore	July 14, 2006
Reach Communications Services (Thailand) Ltd.	Thailand	August 18, 2010
UK Broadband Limited	United Kingdom	July 14, 2006

For the convenience of the Commission, a complete and current list of REACH’s foreign carrier affiliations is provided in Annex A to this Attachment. This list includes all of the foreign carrier affiliates for which REACH has previously provided notice to the Commission (in applications or notifications) except those affiliates that are no longer in service.

Question 18 – FCC authorizations and services authorized

REACH was authorized to provide switched and private-line international services on a facilities-based and resale basis to the countries listed in response to Question 17 in FCC File No. ITC-214-20001228-00771 (DA 01-2833, rel. Dec. 6, 2001).

Question 19 – Countries served solely through resale of unaffiliated carriers

REACH serves none of the countries listed in Question 17 solely through the resale of the international switched services of unaffiliated U.S. facilities-based carriers.

Question 20 – Ownership information

PCCW Limited (“PCCW”) and Telstra Corporation Limited (ABN 33 051 775 556) (“Telstra”) each holds a 50 percent indirect ownership interest in REACH, as follows.

PCCW. REACH is 50 percent owned by Pacific Century Cable Holdings Limited (“PCCH”, a Bermuda company and a wholly-owned subsidiary of PCCW) that is a holding company. PCCH’s address is:

Pacific Century Cable Holdings Limited
Clarendon House
2 Church Street
Hamilton HM11
Bermuda

The following entities hold directly or indirectly a 10 percent or greater ownership interest in PCCH:

Name: PCCW Limited
Address: 39th Floor, PCCW Tower
TaiKoo Place
979 King’s Road
Quarry Bay, Hong Kong
Citizenship: Hong Kong
Principal Business: Telecommunications
Percentage Held: PCCW Limited holds directly 100 percent of the ownership interests of PCCH.

Name: Pacific Century Regional Developments Limited
Address: 6 Battery Road
#38-02 Singapore 049909
Citizenship: Singapore
Principal Business: Investment holding company
Percentage Held: Pacific Century Regional Developments Limited holds directly approximately 21.29 percent of the ownership interests of PCCW Limited.

Name: Pacific Century Group (Cayman Islands) Limited
Address: Scotia Centre, 4th Floor
P.O. Box 2804, George Town
Grand Cayman
KY1-1112, Cayman Islands
Citizenship: Cayman Islands
Principal Business: Investment holding company
Percentage Held: Pacific Century Group (Cayman Islands) Limited holds directly approximately 37.50 percent and indirectly approximately 37.76 percent (via Anglang Investments Limited) of the ownership interests of Pacific Century Regional Developments Limited.

Name: Pacific Century International Limited
Address: BCI House, Avarua
Rarotonga, Cook Islands
Citizenship: Cook Islands
Principal Business: Investment holding company
Percentage Held: Pacific Century International Limited holds directly 100 percent of the ownership interests of Pacific Century Group (Cayman Islands) Limited.

Name: Pacific Century Group Holdings Limited
Address: Romasco Place, Wickhams Cay 1
P.O. Box 3140, Road Town
Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company
Percentage Held: Pacific Century Group Holdings Limited holds directly 100 percent of the ownership interests of Pacific Century International Limited, and directly approximately 1.55 percent of the ownership interest of PCCW Limited.

Name: Ocean Star Management Limited
Address: Richmond House, 12 Par-la-Ville Road
Hamilton, HM08, Bermuda
Citizenship: Bermuda
Principal Business: Investment holding company
Percentage Held: Ocean Star Management Limited holds directly 100 percent of the ownership interests of Pacific Century Group Holdings Limited as trustee of The Ocean Unit Trust and The Starlite Unit Trust.

Name: OS Holdings Limited
Address: Clarendon House, 2 Church Street
Hamilton, HM11, Bermuda
Citizenship: Bermuda
Principal Business: Investment holding company
Percentage Held: OS Holdings Limited holds directly 100 percent of the ownership interests of Ocean Star Management Limited.

Name: China Netcom Corporation (BVI) Limited
Address: Wickhams Cay 1, P.O. Box 3140, Road Town
Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company

Percentage Held: China Netcom Corporation (BVI) Limited holds directly approximately 18.48 percent of the ownership interests of PCCW Limited.

Name: China Netcom Group Corporation (BVI) Limited
Address: Wickhams Cay 1, P.O. Box 3140, Road Town
Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company
Percentage Held: China Netcom Group Corporation (BVI) Limited holds directly 100 percent of the ownership interests of China Netcom Corporation (BVI) Limited.

Name: China United Network Communications Group Company Limited
Address: No.21 Financial Street, Xicheng District
Beijing, 100033, The People's Republic of China
Citizenship: The People's Republic of China
Principal Business: Telecommunications
Percentage Held: China United Network Communications Group Company Limited directly holds 100 percent of the ownership interests of China Netcom Group Corporation (BVI) Limited.

Name: The People's Republic of China
Citizenship: The People's Republic of China
Principal Business: Government
Percentage Held: The People's Republic of China holds directly 100 percent of the ownership interests of China United Network Communications Group Company Limited.

Telstra. Telstra Holdings (Bermuda) No. 1 Limited ("Telstra Bermuda") holds 50 percent of the ownership interest in REACH. Telstra Bermuda is a Bermuda corporation and a holding company. The address of Telstra Bermuda is as follows:

Telstra Holdings (Bermuda) No. 1 Limited
Clarendon House
2 Church Street
Hamilton MH11
Bermuda

Telstra Bermuda is a wholly-owned subsidiary of Telstra Holdings Pty Limited (ABN 33 057 808 938), an Australian company and a holding company. Telstra Holdings Pty Limited's address is as follows:

Telstra Holdings Pty Limited (ABN 33 057 808 938)
Level 13, 231 Elizabeth Street
Sydney, NSW 2000
Australia

Telstra Holdings Pty Limited is wholly owned by an Australian telecommunications company, Telstra Corporation Limited. The address of Telstra Corporation Limited is as follows:

Telstra Corporation Limited (ABN 33 051 775 556)
242 Exhibition Street
Melbourne, VIC 3000
Australia.

The Future Fund Board of Guardians (“Future Fund Board”) holds 8.81 percent of the ownership interest in Telstra. The Future Fund Board is a Commonwealth investment fund organized under the laws of the Commonwealth of Australia as a Commonwealth Government Entity. The Future Fund was set up to strengthen the Commonwealth’s long-term finances by providing for its unfunded employees retirement plan liabilities. The Future Fund Board is a separate legal entity from the Commonwealth, is responsible for investment decisions of the Future Fund, and holds the Future Fund’s assets for and on behalf of the Commonwealth. The Future Fund Board has rights and obligations like any other Telstra shareholder and thus does not have *de facto* control of Telstra. The address of the Future Fund Board is as follows:

Future Fund Board of Guardians
Locked Bag 22010
Melbourne, VIC 3001
Australia

Question 21 – Interlocking directors

The following individuals are officers or directors of REACH as well as one or more of the foreign carrier affiliates listed in the response to Question 17 above:

- Alexander Anthony Arena: BtN Access Limited, Hong Kong Telecommunications (HKT) Limited, PCCW Mobile HK Limited, UK Broadband Limited.
- Poon Philana Wai Yin: Hong Kong Telecommunications (HKT) Limited.

Complete List of REACH Foreign Carrier Affiliates

Name of the Affiliated Carrier:	Country:
Telstra Corporation Limited*	Australia
REACH Services Asia Limited	Bangladesh
BtN Access Limited	British Virgin Islands
PCCW Global (Germany) GmbH	Germany
PCCW Global (Hellas) Telecommunications Services S.A.	Greece
CSL Limited**	Hong Kong
Hong Kong Telecommunications (HKT) Limited	Hong Kong
New World PCS Limited	Hong Kong
PCCW Global (HK) Limited	Hong Kong
PCCW Global Limited	Hong Kong
PCCW Mobile HK Limited	Hong Kong
PCCW-HKT Network Services Limited	Hong Kong
PCCW-HKT Telephone Limited	Hong Kong
REACH Cable Networks Limited	Hong Kong
REACH Global Services Limited	Hong Kong
REACH Networks Hong Kong Limited	Hong Kong
Telstra International HK Limited (HK)	Hong Kong
PCCW Global (Japan) K.K.	Japan
PCCW Global Pte. Ltd. (Japan Branch)	Japan
REACH Networks K.K.	Japan
Telstra Japan (Retail) K.K.	Japan
REACH Bandwidth Services Malaysia Sdn. Bhd.	Malaysia
PCCW Global B.V.	Netherlands
REACH Network Services NZ Limited	New Zealand
Telstra Limited (f/k/a Navigator Communications (New Zealand) Limited)	New Zealand
TelstraClear Limited (f/k/a Telstra Saturn Limited)	New Zealand
REACH Networks Philippines Inc.	Philippines
HKT Global (Singapore) Pte Ltd	Singapore
PCCW Global (Singapore) Pte. Ltd.	Singapore
PCCW Global Pte. Ltd.	Singapore
REACH International Telecom (Singapore) Pte. Limited	Singapore
Telstra Singapore Pte Ltd	Singapore
PCCW Global Korea Limited	South Korea
REACH Network Services Korea Limited	South Korea
Taihan REACH Limited	South Korea

Name of the Affiliated Carrier:	Country:
PCCW-HKT Limited (Taiwan Branch)	Taiwan
REACH Networks (Taiwan) Limited	Taiwan
REACH Services Taiwan Limited	Taiwan
Reach Communications Services (Thailand) Ltd.	Thailand
PCCW Global (UK) Limited	United Kingdom
REACH Europe Ltd.	United Kingdom
Telstra Limited (f/k/a Telstra (UK) Limited or Telstra Europe Limited)	United Kingdom
UK Broadband Limited	United Kingdom

*Since REACH is regulated as dominant on the U.S.-Australia route by virtual of its affiliation with Telstra Corporation Limited, not all affiliated companies in Australia are listed.

**CSL Limited obtained a Unified Carrier Licence in Hong Kong in June 2009, thus replacing the licenses previously held by Hong Kong CSL Limited New World PCS Limited.