AT&T Mobility LLC Foreign Carrier Affiliation Notification Attachment 1 Page 1 of 4

ATTACHMENT 1

Foreign Carrier Affiliation Notification

Pursuant to Section 63.11 of the Commission's rules, AT&T Mobility LLC hereby submits on behalf of its subsidiaries and other affiliates that hold international Section 214 authorizations (collectively referred to as "AT&T Mobility" or "the Applicants")¹ this foreign carrier affiliation notification to update the Commission's records concerning its affiliations with carriers in Japan.

Answer to Question 10

This notification does not result from an acquisition. AT&T Mobility submits this notification to update the Commission's records to include AT&T Japan LLC as one of its foreign carrier affiliates in Japan. AT&T Japan LLC holds a notification license authorizing the provision of resold telecommunications services, but makes all customer sales through its wholly owned subsidiary, AT&T Japan KK (formerly AT&T Global Network Services Japan KK), which also holds a notification license authorizing the provision of resold telecommunications services. AT&T Japan LLC will shortly begin contracting directly with customers, and AT&T Japan KK will cease all sales activities.

Answer to Questions 12 and 16

Applicants certify that Japan is a WTO member country.² AT&T Japan LLC does not own facilities in Japan.

Pursuant to Section 63.10 of the Commission's rules, 47 C.F.R. Sect. 63.10, Applicants qualify for continued non-dominant classification on the route between the U.S. and Japan because AT&T Japan LLC has no market power on the foreign end of this route. AT&T Japan LLC has market shares under 50 percent in all relevant markets on the foreign end of the U.S.-Japan route, including the international transport and local access markets in Japan, and is not 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 Telecommunication's List of Foreign Telecommunication's List of Foreign Telecommunications Markets*. *See* Public Notice, *The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Market Power in Foreign Telecommunications Markets, Jan. 26, 2007,*

¹ 47 C.F.R. § 63.11(b). For a list of the Applicants, please see Attachment 2.

² See <u>http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm</u> (listing WTO Members) (last visited March 25, 2011).

AT&T Mobility LLC Foreign Carrier Affiliation Notification Attachment 1 Page 2 of 4

http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-07-233A1.pdf. Accordingly, pursuant to Section 63.10(a)(3), Applicants are presumptively classified as non-dominant on this route.

Answer to Question 17

AT&T Japan LLC is authorized to provide resold telecommunications services to the public in Japan.

Answer to Question 18

See Attachment 2.

Answer to Question 19

Applicants do not provide services to Japan solely through the resale of the international switched services of unaffiliated United States facilities-based carriers.

Answer to Question 20

AT&T Mobility LLC is a wholly-owned, indirect subsidiary of AT&T Inc. ("AT&T"). AT&T is a publicly traded company with no person or entity known to own ten percent or more of the company's outstanding stock. The name, address, citizenship, and principal business of each of AT&T Mobility LLC's ten percent or greater interest holders are:⁴

AT&T Mobility Corporation 1025 Lenox Park Blvd. NE Atlanta, GA 30319 Citizenship: Delaware Principal Business: Management Company Direct Ownership Interest: less than 1% of and controls AT&T Mobility LLC

AT&T Teleholdings, Inc. 208 S. Akard Street Dallas, TX 75202 Citizenship: Delaware Principal Business: Holding Company Direct Ownership Interest: 100% of AWACS, Inc.; and 100% of SBC Telecom, Inc.

AWACS, Inc.

⁴ The ownership interests provided herein are the actual direct ownership interests held in the next disclosed subsidiary in the vertical ownership chain rounded to the nearest one percent.

AT&T Mobility LLC Foreign Carrier Affiliation Notification Attachment 1 Page 3 of 4

208 S. Akard Street Dallas, TX 75202 Citizenship: Pennsylvania Principal Business: Telecommunications Direct Ownership Interest: More than 99% of SBC Alloy Holdings, Inc.

Bell South Corporation 675 W. Peachtree St. NW Room 4319 Atlanta, GA 30375 Citizenship: Georgia Principal Business: Holding Company Direct Ownership Interest: 100% of Bell South Enterprises, Inc.

BellSouth Enterprises, Inc. 675 W. Peachtree St. NW Room 4319 Atlanta, GA 30375 Citizenship: Georgia Principal Business: Holding Company Direct Ownership Interest: 100% of BellSouth Mobile Data, Inc.

Bell South Mobile Data, Inc. 675 W. Peachtree St. NW Room 4319 Atlanta, GA 30375 Citizenship: Georgia Principal Business: Holding Company Direct Ownership Interest: 34% of AT&T Mobility LLC; 100% of New Bell South Cingular Holdings, Inc.; and 100% of AT&T Mobility Corporation

New BellSouth Cingular Holdings, Inc. 1025 Lenox Park Blvd NE Atlanta, GA 30319 Citizenship: Delaware Principal Business: Holding Company Direct Ownership Interest: 6% of AT&T Mobility LLC

SBC Alloy Holdings, Inc. 208 S. Akard Street Dallas, TX 75202 Citizenship: Delaware

AT&T Mobility LLC Foreign Carrier Affiliation Notification Attachment 1 Page 4 of 4

Principal Business: Holding Company Direct Ownership Interest: 9% of AT&T Mobility LLC

SBC Long Distance, LLC 208 S. Akard Street Dallas, TX 75202 Citizenship: Delaware Principal Business: Holding Company Direct Ownership Interest: 50% of AT&T Mobility LLC

SBC Telecom, Inc. 208 S. Akard Street Dallas, TX 75202 Citizenship: Delaware Direct Principal Business: Holding Company Direct Ownership Interest: 100% of SBC Long Distance, LLC

AT&T Inc. 208 S. Akard Street Dallas, TX 75202 Citizenship: Delaware Principal Business: Holding Company Direct Ownership Interest: 100% of AT&T Teleholdings, Inc.; 83% of AT&T Services, Inc.; and 100% of BellSouth Corporation.

Answer to Question 21

AT&T Mobility has no interlocking directorates with AT&T Japan LLC as defined in Section 63.09(g) of the Commission's rules, 47 C.F.R. § 63.09(g).