

ATTACHMENT

Response to Question 10

Level 3 International, Inc. (“Level 3 International”) makes this notification pursuant to 47 C.F.R. § 63.12(b)(2)(i). Level 3 International recently discovered that it had not made foreign carrier affiliation notifications with respect to Canada, Finland, Hungary, and Norway, four destination markets where Level 3 International’s parent company established new subsidiaries to operate as competitive carriers in those markets. Level 3 International regrets the delay in making this notification.

Response to Question 12(b)

Level 3 International’s foreign-carrier affiliates in Canada, Finland, Hungary, and Norway all own or lease facilities in their respective markets.

Response to Question 12(c)(1)

Level 3 International is entitled to retain non-dominant classification on its newly affiliated routes pursuant to 47 C.F.R. § 63.10(a)(3). Level 3 International’s foreign-carrier affiliates in Canada, Finland, Hungary, and Norway lack market power in their respective markets. As new entrants in their respective market, Level 3 International’s newly-affiliated foreign carriers have negligible market share, and lack 50-percent market share in either the international transport market or local access market of their respective geographic markets. These foreign carriers do not appear on the Commission’s list of foreign telecommunications

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carriers presumed to possess market power in foreign telecommunications markets.¹ These foreign carriers therefore qualify for presumptions of non-dominance pursuant to 47 C.F.R. § 63.10(a)(3) and exemptions from the dominant carrier safeguards in 47 C.F.R. §§ 63.10(c)-(e).

Response to Question 16

Level 3 International requests continued regulation as a non-dominant international carrier pursuant to 47 C.F.R. § 63.10.

Response to Question 17:

Level 3 International's foreign carrier affiliates in Canada, Finland, Hungary, and Norway are authorized to provide Internet protocol and data transport services in their respective markets.²

AFFILIATED FOREIGN CARRIER	COUNTRY	DATE OF COMMENCEMENT OF SERVICE
Level 3 Communications Canada Co.	Canada	January 2003
Level 3 Communications Oy	Finland	Nov. 19, 2010
Level 3 Communications Távközlési Korlátolt Felelősségű Társaság	Hungary	June 2007
Oslo branch office of Level 3 Communications AB	Norway	Aug. 1, 2006

Canada, Finland, Hungary, and Norway are all WTO members.³

¹ See *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, 22 FCC Rcd. 945 (Int'l Bur. 2007)*.

² See 47 C.F.R. § 63.11(e)(1).

Response to Question 18:

Pursuant to FCC File No. ITC-214-19981214-00867, Level 3 International is authorized to provide global facilities-based and global resale services to Canada, Finland, Hungary, and Norway.⁴

Response to Question 19:

Level 3 International does not serve Canada, Finland, Hungary, or Norway solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.⁵

Response to Question 20:

The names, addresses, citizenships, and principal businesses of Level 3 International's 10-percent-or-greater direct or indirect owners are as follows.⁶ Level 3 International is a wholly-owned, direct subsidiary of Level 3 Financing, Inc. ("Level 3 Financing"), a Delaware corporation operating as a holding company. Level 3 Financing's address is 1025 Eldorado Boulevard, Broomfield, Colorado 80021. Level 3 Financing, in turn, is a wholly-owned, direct subsidiary of Level 3 Parent, a Delaware corporation engaged in the business of providing, through its operating subsidiaries, a wide range of communications services over its extensive broadband fiber-optic network in North America, Europe, and Asia, including Internet-protocol-based services, broadband transport, collocation services, and patented Softswitch-based

³ See *id.* § 63.11(e)(2); World Trade Organization, *Members and Observers* (as of July 23, 2008), available at http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

⁴ See *Overseas Common Carrier Section 214 Applications and Section 310(b)(4) Actions Taken, Public Notice*, 14 FCC Rcd. 4996 (1999); 47 C.F.R. § 63.11(e)(3).

⁵ See *id.* § 63.11(e)(4).

⁶ See *id.* § 63.11(e)(5).

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managed modem and voice services. Level 3 Parent's address is 1025 Eldorado Boulevard, Broomfield, Colorado 80021. Level 3 Parent has no controlling shareholder or group of shareholders exercising common control.

Only one party holds a ten-percent-or-greater direct or indirect interest in Level 3 Parent: Southeastern Asset Management, Inc. ("SAM"). SAM is a Tennessee corporation engaged in the business of providing investment advisory services and located at 6410 Poplar Avenue, Suite 900, Memphis, Tennessee 38119. SAM holds sole or shared voting rights for 31.46 percent of the outstanding shares of Level 3 Parent that are otherwise owned by other entities for whom SAM acts as an investment advisor.

Response to Question 21:

The following individuals are officers or directors of Level 3 International and officers or directors of foreign carriers:

- Jeffrey K. Storey, who is President of Level 3 International, is also a Director of Level 3 Communications Canada Co.
- Robert M. Yates, who is Senior Vice President, Assistant Chief Legal Officer, and Assistant Secretary of Level 3 International, is also a Director of Level 3 Communications (Austria) Limited (Austria); a Director of Level 3 Communications S.A. (Belgium); a Director of Level 3 Communications EOOD (Bulgaria); a Director of Level 3 Communications Canada Co. (Canada); a Director of Level 3 Communications (Denmark) Limited (Denmark); a Director of Level 3 Communications S.A.S. (France); a Director of Level 3 Communications GmbH (Germany); a Director of Level 3 CDN Hong Kong (Hong Kong); a Director of Level 3 Communications Limited (Ireland); a Director of Level 3 Communications (Ireland) Limited (Ireland); a Director of Level 3 Communications SrL (Italy); a Director of Level 3 Communications K.K. (Japan); a Director of Level 3 Communications S.a.r.l. (Luxembourg); a Director of Level 3 Communications B.V. (the Netherlands); a Director of Level 3 Communications S.R.L. (Romania); a Director of Level 3 Communications SLU (Spain); a Director of Level 3 Communications AB (Sweden); Director of Level 3 Communications Limited (United Kingdom); and a Director of Level 3 Communications (Servecast) Limited (United Kingdom).