

ATTACHMENT

Response to Question 10

Level 3 Communications, LLC (“Level 3 LLC”) makes this notification pursuant to Section 63.12(b)(2)(i) of the Commission’s rules.¹ Level 3 LLC’s ultimate parent company, Level 3 Communications, Inc. (“Level 3 Parent”), has recently established new subsidiaries to operate as competitive carriers in Croatia and Slovenia, creating foreign affiliations with those subsidiaries.

Response to Question 12(b)

Level 3 LLC’s new foreign-carrier affiliates in Croatia and Slovenia each own or lease facilities in their respective markets.

Response to Question 12(c)(1)

Level 3 LLC is entitled to retain non-dominant classification on its newly affiliated routes pursuant to Section 63.10(a)(3) of the Commission’s rules.² Level 3 LLC’s new foreign-carrier affiliates lack market power in their respective markets. As new entrants in their respective markets, Level 3 LLC’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 newly-affiliated foreign carriers do not appear on the Commission’s list of foreign telecommunications carriers presumed to possess market power in

¹ See 47 C.F.R. § 63.12(b)(2)(i).

² See *id.* §§ 63.10(a)(3), 63.11(f).

foreign telecommunications markets.³ These foreign carriers therefore qualify for presumptions of non-dominance pursuant to Section 63.10(a)(3) of the Commission's rules and exemptions from the dominant carrier safeguards in Sections 63.10(c) through (e) of the Commission's rules.⁴

Response to Question 16

Level 3 LLC requests continued regulation as a non-dominant international carrier pursuant to Section 63.10 of the Commission's rules.

Response to Question 17:

Level 3 LLC's newly-affiliated foreign carriers are authorized to provide high-speed Internet protocol services in Croatia and Slovenia.⁵

AFFILIATED FOREIGN CARRIER	COUNTRY	DATE OF COMMENCEMENT OF SERVICE
Level 3 Komunikacijske Usluge d.o.o.	Croatia	June 20, 2011
Level 3 telekomunikacijske storitve d.o.o.	Slovenia	June 1, 2011

Croatia and Slovenia are WTO members.⁶

³ 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).

⁴ See 47 C.F.R. §§ 63.10(a)(3), (c)-(e).

⁵ See *id.* § 63.11(e)(1).

⁶ 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.

Response to Question 18:

Pursuant to FCC File No. ITC-214-19971229-00821 (previously FCC File No. ITC-98-016), Level 3 LLC is authorized to provide global facilities-based and global resale services to Croatia and Slovenia.⁷

Response to Question 19:

Level 3 LLC does not serve Croatia or Slovenia solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.⁸

Response to Question 20:

The names, addresses, citizenships, and principal businesses of Level 3's 10-percent-or-greater direct or indirect owners are as follows.⁹ Level 3 LLC 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 managed modem and

⁷ 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).

⁸ See *id.* § 63.11(e)(4).

⁹ See *id.* § 63.11(e)(5). The details of Level 3 LLC's ten-percent-or-greater shareholders will change as a consequence of the pending acquisition by Level 3 Parent of Global Crossing Limited. Related applications for Commission consent to that transaction remain pending in IB Docket No. 11-78.

Level 3 Communications, LLC
Foreign Carrier Affiliation Notification
6 July 2011

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 LLC and officers or directors of foreign carriers:

- Richard Haywood, who is Senior Vice President of Level 3 LLC, 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 Komunikacijske Usluge d.o.o. (Croatia); a Director of Level 3 Communications (Denmark) Limited (Denmark); Chairman of Level 3 Communications Oy (Finland); a Director of Level 3 Communications S.A.S. (France); a Director of Level 3 Communications GmbH (Germany); a Director of Level 3 Communications Távközlési Korlátolt Felelősségű Társaság (Hungary); a Director of Level 3 Communications SrL (Italy); 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 GmbH Spółka z Ograniczoną Odpowiedzialnością - Oddział w Polsce (Poland); a Director of Level 3 Communications S.R.L. (Romania); a Director of Level 3 Communications spol. s.r.o. (Slovakia); a Director of Level 3 telekomunikacijske storitve d.o.o. (Slovenia); a Director of Level 3 Communications SLU (Spain); a Director of Level 3 Communications AB (Sweden); and a Director of Level 3 Communications Limited (United Kingdom).

Level 3 Communications, LLC
Foreign Carrier Affiliation Notification
6 July 2011

- John McCarthy, who is Vice President of Level 3 LLC, 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 Komunikacijske Usluge d.o.o. (Croatia); a Director of Level 3 Communications s.r.o. (Czech Republic); a Director of Level 3 Communications (Denmark) Limited (Denmark); a Director of Level 3 Communications Oy (Finland); a Director of Level 3 Communications S.A.S. (France); a Director of Level 3 Communications GmbH (Germany); a Director of Level 3 Communications Távközlési Korlátolt Felelősségű Társaság (Hungary); a Director of Level 3 Communications Limited (Ireland); a Director of Level 3 Communications (Ireland) Limited (Ireland); Chairman 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 GmbH Spółka z Ograniczoną Odpowiedzialnością - Oddział w Polsce (Poland); a Director of Level 3 Communications S.R.L. (Romania); a Director of Level 3 Communications spol. s.r.o. (Slovakia); a Director of Level 3 telekomunikacijske storitve d.o.o. (Slovenia); Chairman of Level 3 Communications SLU (Spain); a Director of Level 3 Communications AB (Sweden); a Director of Level 3 Communications AG (Switzerland); Director of Level 3 Communications Limited (United Kingdom); and a Director of Level 3 Communications (Servecast) Limited (United Kingdom).
- Jeffrey K. Storey, who is Chief Operating Officer of Level 3 LLC, 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 LLC, 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); 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 GmbH Spółka z Ograniczoną Odpowiedzialnością - Oddział w Polsce (Poland); 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).