

**Attachment 1**

**Question 5 – Countries of affiliation**

By this filing, Telstra Incorporated (“Telstra USA”) notifies the FCC of affiliations with a foreign carrier in India.

**Question 10 – Late notification**

As appropriate, Telstra USA requests a waiver of the requirement that carriers notify the FCC of foreign affiliations within 30 days after closing. Telstra USA’s failure to file within the specified timeframe was inadvertent. Telstra USA notes that it clearly qualifies for continued nondominant treatment on the U.S. – India route. Telstra USA apologizes for any inconvenience resulting from its failure to file this notification in a timely manner.

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

Telstra USA is currently regulated as non-dominant on the U.S. – India route. Telstra USA asks that it continue to be regulated as a non-dominant carrier on this route. Continued non-dominant treatment is appropriate on this route because Telstra USA’s foreign carrier affiliate in India lacks a 50 percent market share in the international transport and local access market in India. Currently, the new foreign carrier affiliate in India (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 16 – Appropriateness of continued non-dominant treatment**

Continued non-dominant treatment is appropriate for Telstra USA on the U.S. – India route since Telstra USA’s affiliate on this route lacks market power in the international transport and local access market in India, 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, Telstra USA advises the FCC that Telstra USA is affiliated with the following foreign carriers:

<b>Name of the Affiliated Carrier:</b>	<b>Country:</b>	<b>Date of Affiliation:</b>
Telstra Telecommunications Private Limited	India	February 28, 2012

For the convenience of the Commission, a complete and current list of Telstra USA's foreign carrier affiliations is provided in Annex A to this Attachment. This list includes all of the foreign carrier affiliates for which Telstra USA 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

Telstra USA holds international Section 214 authority to provide facilities-based and resold international telecommunications services. *See* File Nos. ITC-214-19970610-00320 (old file no. ITC-97-320) (facilities-based service between the U.S. and Australia); ITC-214-19970610-00321 (old file no. ITC-97-319) (facilities-based service between the U.S. and all approved international points, except Australia); ITC-214-19960610-00238 (old file no. ITC-96-321) (resold switched and non-interconnected private line services between the U.S. and all approved international points, except Australia); ITC-214-19960610-00241 (old file no. ITC-96-320) (international simple resale services between the U.S. and all approved international points); ITC-214-19960610-00240 (old file no. ITC-96-319) (international simple resale and resold switched and private line services between the U.S. and Australia).

Question 19 – Countries served solely through resale of unaffiliated carriers

Telstra USA does not serve India solely through the resale of the international switched services of unaffiliated U.S. facilities-based carriers.

Question 20 – Ownership information

Telstra USA is a wholly-owned subsidiary of Telstra Holdings, an Australian company and a holding company. Telstra Holdings' address is as follows:

Telstra Holdings Pty Limited (ABN 33 057 808 938)  
Level 41, 242 Exhibition Street  
Melbourne, VIC 3000  
Australia

Telstra Holdings is wholly owned by an Australian telecommunications company, Telstra Corporation Limited (ABN 33 051 775 556) ("Telstra"). The address of Telstra 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 0.8 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

No other entity or individual holds a 10 percent or greater ownership or voting interest in Telstra USA as calculated under the Commission’s ownership attribution rules.

Question 21 – Interlocking directors

No individuals are officers or directors of Telstra USA as well as the carriers listed in the response to Question 17.

**Telstra Incorporated**  
**Foreign Carrier Affiliation Notification**  
**Annex A**

**Complete List of Telstra USA Foreign Carrier Affiliates**

<b>Notes:</b>	<b>Name of the Affiliated Carrier:</b>	<b>Country:</b>
1	Telstra Corporation Limited	Australia
	REACH Services Asia Limited	Bangladesh
	CSL Limited	Hong Kong
	REACH Cable Networks Limited	Hong Kong
2	Telstra International Ltd	Hong Kong
	REACH Networks Hong Kong Limited	Hong Kong
	Telstra International HK Limited (HK)	Hong Kong
	Telstra Telecommunications Private Limited	India
	REACH Networks K.K.	Japan
3	Telstra Japan KK	Japan
4	Telstra Malaysia Sdn. Bhd.	Malaysia
5	Telstra Network Services NZ Ltd.	New Zealand
6	Telstra NZ Ltd	New Zealand
	TelstraClear Limited	New Zealand
7	Telstra Philippines Inc.	Philippines
	REACH International Telecom (Singapore) Pte. Limited	Singapore
	Telstra Singapore Pte Ltd	Singapore
8	Telstra Network Services Korea Ltd.	South Korea
	Taihan REACH Limited	South Korea
	REACH Networks (Taiwan) Limited	Taiwan
	REACH Services Taiwan Limited	Taiwan
	Reach Communications Services (Thailand) Ltd.	Thailand
	REACH Europe Ltd.	United Kingdom
	Telstra Limited	United Kingdom

Notes

1. Since Telstra USA is regulated as dominant on the U.S.-Australia route by virtue of its affiliation with Telstra Corporation Limited, not all affiliated companies in Australia are listed.
2. Formerly known as REACH Global Services Limited.
3. Formerly known as Telstra Japan (Retail) K.K.
4. Formerly known as REACH Bandwidth Services Malaysia Sdn. Bhd.
5. Formerly known as REACH Network Services NZ Limited.
6. Formerly known as Telstra Limited.
7. Formerly known as REACH Networks Philippines Inc.
8. Formerly known as REACH Network Services Korea Limited.