

**Attachment 1**

**Question 5 – Countries of affiliation**

By this filing, Reach Ltd. (“REACH”) notifies the FCC of an affiliation with a foreign carrier in India.

**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. REACH notes that it clearly qualifies for continued nondominant treatment on the U.S.-India 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 is currently regulated as non-dominant on the U.S.-India route. REACH 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 REACH’s foreign carrier affiliate lacks 50 percent market share in the international transport and local access markets 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 REACH on the U.S.-India route since REACH’s affiliate on this route lacks market power in the international transport and local access markets 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, REACH advises the FCC that REACH 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 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

HKT Limited (“HKT,” a non-wholly-owned subsidiary of 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.

*HKT.* REACH is indirectly 50-percent owned by HKT Limited, a Cayman Islands limited liability company that is an investment holding company. HKT Limited’s address is as follows:

Name:	HKT Limited
Registered Office:	P.O. Box 309 Ugland House, Grand Cayman KY1-1104, Cayman Islands
Business Address:	39th Floor, PCCW Tower TaiKoo Place 979 King’s Road Quarry Bay, Hong Kong

The following entities/trust hold a 10 percent or greater ownership interest in HKT Limited.

Name:	HKT Trust (a trust constituted on 7 November 2011 under the laws of Hong Kong and managed by HKT Management Limited)
Address:	c/o 39th Floor, PCCW Tower TaiKoo Place, 979 King’s Road Quarry Bay, Hong Kong
Citizenship:	Hong Kong
Principal Business:	Investment holding
Percentage Held:	As HKT Trust is not a legal entity, all the assets of the HKT Trust are held by HKT Management Limited for the benefit of the HKT Trust.

Name: HKT Management Limited  
Address: 39th Floor, PCCW Tower  
TaiKoo Place  
979 King's Road  
Quarry Bay, Hong Kong  
Citizenship: Hong Kong  
Principal Business: Trustee and manager of the HKT Trust  
Percentage Held: HKT Management Limited holds all of the issued ordinary shares of HKT Limited in its capacity as trustee and manager of the HKT Trust upon and subject to the terms and conditions of a trust deed constituting the HKT Trust.

Name: CAS Holding No. 1 Limited  
Address: P.O. Box 957  
Offshore Incorporations Centre, Road Town  
Tortola, British Virgin Islands  
Citizenship: British Virgin Islands  
Principal Business: Investment holding  
Percentage Held: CAS Holding No. 1 Limited holds directly approximately 63.07 percent of the issued share stapled units of the HKT Trust and HKT Limited and 100 percent of the ownership interests of HKT Management Limited, the trustee and manager of the HKT Trust.

Name: PCCW Limited  
Address: 38th Floor, Citibank Tower  
Citibank Plaza  
3 Garden Road  
Central, Hong Kong  
Citizenship: Hong Kong  
Principal Business: Telecommunications, media, IT solutions, property development and investment  
Percentage Held: PCCW Limited holds directly 100 percent of the ownership interests of CAS Holding No. 1 Limited.

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

Name: China United Network Communications Group Company, Limited  
Address: 21 Jin Rong 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: Pacific Century Regional Developments Limited  
Address: 6 Battery Road  
#38-02 Singapore 049909  
Citizenship: Singapore  
Principal Business: Investment holding  
Percentage Held: Pacific Century Regional Developments Limited beneficially holds (i) an approximate 21.29 percent interest in PCCW Limited and (ii) an approximate 1.74 percent interest in the HKT Trust and HKT 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:

Name: Telstra Holdings (Bermuda) No. 1 Limited  
Address: 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:

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

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

Name: Telstra Corporation Limited (ABN 33 051 775 556)  
Address: 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:

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

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

Question 21 – Interlocking directors

There are no interlocking directors between REACH and the foreign carrier affiliates listed in the response to Question 17 above.

**Complete List of REACH 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
	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
	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
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
	PCCW Global (Japan) K.K.	Japan
	PCCW Global Pte. Ltd. (Japan Branch)	Japan
	REACH Networks K.K.	Japan
3	Telstra Japan KK	Japan
4	Telstra Malaysia Sdn. Bhd.	Malaysia
	PCCW Global B.V.	Netherlands
5	Telstra Network Services NZ Limited	New Zealand
6	Telstra NZ Ltd.	New Zealand
	TelstraClear Limited	New Zealand
7	Telstra 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
8	Telstra Network Services Korea Limited	South Korea
	Taihan REACH Limited	South Korea

<b>Notes:</b>	<b>Name of the Affiliated Carrier:</b>	<b>Country:</b>
	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	United Kingdom
	UK Broadband Limited	United Kingdom

Notes

1. 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.
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.