#### **ATTACHMENT 1**

#### **Foreign Carrier Affiliation Notification**

Pursuant to Section 63.11 of the Commission's rules, 47 C.F.R. § 63.11(c), StarHub, Inc. ("StarHub") hereby submits this foreign carrier affiliation notification in connection with new affiliations with subsidiaries or affiliates of Level 3 Communications, Inc. ("Level 3") in the following countries: Argentina, Australia, Austria, Belgium, Brazil, Bulgaria, Canada, Chile, Colombia, Costa Rica, Croatia, the Czech Republic, Denmark, Ecuador, Finland, France, Germany, Hong Kong, Hungary, Ireland, Italy, Japan, Luxembourg, Mexico, the Netherlands, Norway, Panama, Peru, Poland, Romania, Singapore, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine, the United Kingdom, Uruguay, and Venezuela. These affiliations arose when StarHub's indirect parent, Singapore Technologies Telemedia Pte Ltd ("ST Telemedia"), increased its interest in Level 3 to exceed the 25-percent threshold. Specifically, through a series of open market purchases of Level 3 common stock that concluded on or about May 18, 2012, ST Telemedia increased its interest in Level 3 to approximately 25.6 percent.

#### **Answers to Questions 12 and 16**

To the best of StarHub's knowledge based on publicly available sources, StarHub's foreign carrier affiliates own or lease facilities in their respective markets.

Each of StarHub's foreign carrier affiliates is authorized to operate in World Trade Organization ("WTO") Member country.

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The Commission consented to ST Telemedia's original acquisition of an approximate 23.92 percent interest in Level 3, and to the prospect of future increases in that interest up to 34.5 percent. *See Applications filed by Global Crossing Limited and Level 3 Communications, Inc. for Consent to Transfer Control*, Memorandum Opinion and Order and Declaratory Ruling, 26 FCC Rcd 14056 ¶ 47 (2011).

With the exception of the U.S.-Singapore route (for which StarHub already is treated as dominant due to an existing affiliation), StarHub is entitled to non-dominant classification on its newly affiliated routes. According to publicly available sources (including Level 3's prior filings with the Commission), each of StarHub's foreign carrier affiliates lacks a 50 percent market share, and none is listed on the Commission's List of Foreign Telecommunications Carriers That Are Presumed to Possess Market Power in Foreign Telecommunications Markets. Accordingly, these foreign carriers qualify for a presumption of non-dominance pursuant to Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3), and StarHub requests continued regulation as a non-dominant international carrier pursuant to that section (again with the exception of the U.S.-Singapore route).

# **Answer to Question 17**

StarHub's new foreign carrier affiliates are authorized to provide telecommunications services in the following WTO Member countries:

Level 3 Foreign Carrier Affiliates		
<b>Destination Country</b>	Foreign Affiliate(s)	
Austria	Vienna branch office of Level 3 Communications	
	(Austria) Limited	
Belgium	Level 3 Communications S.A.	
Bulgaria	Level 3 Communications EOOD	
Canada	Level 3 Communications Canada Co.	
Croatia	Level 3 Komunikacijske Usluge d.o.o.	
Czech Republic	Level 3 Communications s.r.o.	

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See The 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, DA 07-233, at 3 (rel. Jan. 26, 2007).

Although StarHub previously agreed to dominant treatment on the U.S.-Ireland route, the affiliation that prompted that agreement recently ceased, eliminating the basis for treating StarHub as dominant on that route. StarHub will make an appropriate filing with the Commission to formally update this issue.

Level 3 Foreign Carrier Affiliates		
<b>Destination Country</b>	Foreign Affiliate(s)	
Denmark	Hellerup branch office of Level 3 Communications	
	(Denmark) Limited	
Finland	Level 3 Communications Oy	
France	Level 3 Communications S.A.S.	
Germany	Level 3 Communications GmbH	
Hungary	Level 3 Communications Távközlési Korlátolt	
	Felelősségű Társaság	
Ireland	Level 3 Communications Limited	
	Level 3 Communications (Ireland) Limited	
Italy	Level 3 Communications SrL	
Japan	Level 3 Communications K.K.	
Luxembourg	Level 3 Communications S.a.r.l.	
The Netherlands	Level 3 Communications B.V.	
Norway	Oslo branch office of Level 3 Communications AB	
Poland	Warsaw branch office of Level 3 Communications GmbH	
Romania	Level 3 Communications S.R.L.	
Slovakia	Level 3 Communications spol. s.r.o.	
Slovenia	Level 3 telekomunikacijske storitve d.o.o.	
Spain	Level 3 Communications SLU	
Sweden	Level 3 Communications AB	
Switzerland	Level 3 Communications AG	
United Kingdom	Level 3 Communications Limited	
	Level 3 Communications (Servecast) Limited	

In addition, StarHub previously was affiliated with the former Global Crossing companies through their common ownership by ST Telemedia. Those affiliations ceased when ST Telemedia sold its majority interest in Global Crossing, which was acquired by Level 3. ST Telemedia's recent acquisitions of Level 3 common stock as discussed above have resulted in the prior affiliations being renewed, as follows:

Global Crossing Foreign Carrier Affiliates		
<b>Destination Country</b>	Foreign Affiliate(s)	
Argentina	GC SAC Argentina S.R.L.	
	Global Crossing Argentina S.A.	
Australia	Global Crossing Australia Pty. Limited	

Global Crossing Foreign Carrier Affiliates		
<b>Destination Country</b>	Foreign Affiliate(s)	
Austria	Global Crossing PEC Österreich GmbH	
Belgium	Global Crossing Belgie b.v.b.a	
Brazil	Global Crossing Comunicacoes do Ltda.	
Canada	Global Crossing Telecommunications Canada Ltd.	
Chile	Global Crossing Chile S.A.	
Colombia	Global Crossing Colombia S.A.	
Costa Rica	Global Crossing Costa Rica S.R.L.	
Czech Republic	Global Crossing PEC Czech s.r.o.	
Denmark	Global Crossing PEC Danmark ApS	
Ecuador	Global Crossing Comunicaciones Ecuador S.A.	
France	GC Pan European Crossing France s.a.r.l.	
Germany	Global Crossing PEC Deutschland GmbH	
Hong Kong	Global Crossing Hong Kong Limited	
Ireland	Global Crossing Ireland Limited	
Italy	Global Crossing PEC Italia s.r.l.	
Japan	Global Crossing Japan K.K.	
Mexico	Global Crossing Landing Mexicana S. de R.L.	
The Netherlands	Global Crossing PEC Nederland B.V.	
Norway	GC Pan European Crossing Norge As	
Panama	Global Crossing Panama Inc.	
	PAC Panama Ltd. (Bermuda) (Panamá Branch)	
	SAC Panamá S.A.	
Peru	Global Crossing Peru S.A.	
	SAC Peru S.R.L.	
	Telecom Infrastructure Hardware S.R.L.	
Singapore	Global Crossing Singapore Pte. Ltd.	
Spain	Global Crossing PEC España S.A.	
Sweden	Global Crossing Sverige A.B.	
Switzerland	Global Crossing PEC Switzerland GmbH	
Turkey	Global Crossing PEC Telekomünikasyon Hizmetleri	
	Limited Şirketi	
Ukraine	Global Crossing PEC Ukraine LLC	
United Kingdom	Global Crossing (UK) Telecommunications Limited	
Uruguay	GC SAC Argentina S.R.L. (Uruguay Branch)	
Venezuela	Global Crossing Venezuela B.V.	
	Global Crossing Venezuela S.A.	

## **Answer to Question 18**

StarHub holds global facilities-based and resale authority pursuant to File Nos. ITC-214-20000731-00473 and ITC-214-20000731-00474.

#### **Answer to Question 19**

StarHub is dormant and thus does not currently provide service to any destination market.

#### **Answer to Question 20**

The following are the names, addresses, citizenship, and principal businesses of any person or entity that directly or indirectly owns at least ten percent of the equity of StarHub:

#### StarHub Ltd

Address: 67 Ubi Avenue 1, #05-01 StarHub Green, Singapore 408942

Citizenship: Singapore

Principal Business: Communications and media services

Relationship: 100 percent owner of StarHub, Inc.

# Asia Mobile Holdings Pte. Ltd. ("AMH")

Address: 51 Cuppage Road #09-01, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 56.53 percent owner of StarHub Ltd

# Asia Mobile Holding Company Pte. Ltd. ("AMHC")

Address: 51 Cuppage Road #09-01, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 75 percent owner of AMH

#### **STT Communications Ltd ("STT Communications")**

Address: 51 Cuppage Road #09-01, Singapore 229469

Citizenship: Singapore

Principal Business: Information communications Relationship: 100 percent owner of AMHC

# **Qtel Investment Holdings S.P.C. ("QIH")**

Address: Flat 631, Building 247, Road 1407, Block 317, Manama Diplomatic

Area, Kingdom of Bahrain

Citizenship: Bahrain

Principal Business: Investment holding company

Relationship: 25 percent (plus one share) owner of AMH (thus, 14.13 percent

indirect owner of StarHub Ltd)

# Qatar Telecom (Qtel) Q.S.C. ("Qtel")

Address: Qtel Tower, 100 West Bay, The Corniche, Doha, Qatar

Citizenship: Qatar

Principal Business: Telecommunications and information technologies

Relationship: 100 percent owner of QIH

# Singapore Technologies Telemedia Pte Ltd ("ST Telemedia")

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Investment holding company

Relationship: 100 percent owner of STT Communications

# **Temasek Holdings (Private) Limited**

Address: 60B Orchard Road #06-18, The Atrium@Orchard, Singapore 238891

Citizenship: Singapore

Principal Business: Investment holding company Relationship: 100 percent owner of ST Telemedia<sup>4</sup>

#### **NTT Communications Corporation**

Address: 1-1-6 Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-8019, Japan

Citizenship: Japan

Principal Business: Telecommunications and information technologies

Relationship: 9.99% percent owner of StarHub Ltd

#### **Nippon Telegraph and Telephone Corporation**

Address: 2-3-1 Otemachi, Chiyoda-ku, Tokyo 100-8116, Japan

Citizenship: Japan

Principal Business: Telecommunications and information technologies Relationship: 100 percent owner of NTT Communications Corporation

Temasek also holds indirect interests in StarHub Ltd through Fullerton Fund Management Company Ltd and DBS Group Holdings Limited, which represents approximately 0.10 percent of StarHub's issued shares.

# **Answer to Question 21**

To the best of StarHub's knowledge, there are no interlocking directorates between StarHub and any foreign carrier affiliate identified above.