

Attachment 1

Question 5 – Countries of affiliation

By this filing, Singapore Telecom USA, Inc. (“SingTel USA”) notifies the FCC of an affiliation with one or more foreign carriers in Australia, China, India, Indonesia, Hong Kong, Malaysia, Taiwan, Thailand, and the United Kingdom (the “Notified Routes”).

Question 10 – Late notification

As appropriate, SingTel USA requests a waiver of the requirement that carriers notify the FCC of foreign affiliations within 30 days after closing. SingTel USA’s failure to file within the specified timeframe was inadvertent. Also, it is possible that some of the foreign carriers on the list do not precisely qualify as foreign carriers under the FCC’s rules; regardless, SingTel USA has elected to notify the Commission of these affiliations out of an abundance of caution. SingTel USA notes that it clearly qualifies for continued nondominant treatment on each of the Notified Routes. SingTel 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

SingTel USA is currently regulated as non-dominant in its provision of service between the U.S. and each of the Notified Routes. SingTel USA asks that it continue to be regulated as a non-dominant carrier on each of these routes. Continued non-dominant treatment is appropriate in each case because on each of the Notified Routes, SingTel USA’s affiliate lacks a 50 percent market share in the international transport and local access markets in the foreign country in which it operates. Currently, the new foreign carrier affiliate on each Notified Route (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 SingTel USA in its provision of service between the U.S. and the Notified Routes since SingTel USA’s affiliate on each of these routes lacks market power in the international transport and local access markets in the foreign country in which it operates, 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, SingTel USA advises the FCC that SingTel USA is affiliated with the following foreign carriers:

Name of the Affiliated Carrier:	Country:	Date of Affiliation:
Optus Data Centres Pty Limited	Australia	October 24, 2001
Optus Mobile Pty Limited	Australia	October 24, 2001
Optus Vision Pty Limited	Australia	October 24, 2001
Simplus Mobile Pty Limited	Australia	October 24, 2001
Source Integrated Networks Pty Limited	Australia	October 24, 2001
Uecomm Operations Pty Limited	Australia	October 11, 2004
Virgin Mobile (Australia) Pty Limited	Australia	January 11, 2006
XYZed Pty Limited	Australia	October 24, 2001
Singapore Telecom Japan Co., Ltd.	China	2002
Singapore Telecom Japan Co., Ltd.	Hong Kong	2002
Singapore Global India Private Limited	India	December 3, 2007
Singapore Telecom Japan Co., Ltd.	India	2010
Singapore Telecom Japan Co., Ltd.	Indonesia	2002
Information Network Services Sdn Bhd	Malaysia	December 26, 1990
Singapore Telecom Japan Co., Ltd.	Malaysia	2002
Singapore Telecom Japan Co., Ltd.	Taiwan	2002
SingTel Taiwan Limited	Taiwan	2002
ST-2 Satellite Ventures Private Limited	Taiwan	July 22, 2008
Singapore Telecom Japan Co., Ltd.	Thailand	2002
Singapore Telecom Japan Co., Ltd.	United Kingdom	2002

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

SingTel USA 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-214-19981005-00681, DA 98-2396, rel. Nov. 24, 1998 (Australia, Thailand, Hong Kong, the U.K.) and FCC File No. ITC-214-19981005-00680, DA 98-2396, rel. Nov. 24, 1998 (China, India, Indonesia, Malaysia, Taiwan).

Question 19 – Countries served solely through resale of unaffiliated carriers

SingTel USA serves none of the Notified Routes solely through the resale of the international switched services of unaffiliated U.S. facilities-based carriers.

Question 20 – Ownership information

SingTel USA is a wholly-owned direct subsidiary of Singapore Telecommunications Limited (“SingTel”), a corporation organized under the laws of Singapore. The address of SingTel is 31 Exeter Road, Comcentre, Singapore 239732. The principal business of SingTel is the provision of local intercity, and international communications services in Singapore.

Temasek Holdings (Private) Limited (“Temasek”) holds an approximately 54.45 percent ownership interest in SingTel (as of July 12, 2012). Temasek is wholly-owned by the Singapore Minister for Finance; it is an investment holding company with diverse interests in a wide spectrum of industries including media, financial services, transportation, ship repair and engineering, properties, hotels, property management and consultancy, construction, leisure and recreation. The address of Temasek is 60B Orchard Road, #06-18 Tower 2, The Atrium@Orchard, Singapore 238891. To the best of SingTel USA’s knowledge and belief, Temasek holds ownership interests in other telecommunications companies in Singapore which are competitors of SingTel and which hold certain licenses to provide mobile cellular telephone and radio paging services in Singapore. However, SingTel USA is uncertain as to whether Temasek holds ownership interests in telecommunications companies in other countries.

No other stockholder holds 10 percent or more of the stock in SingTel USA through SingTel.

Question 21 – Interlocking directors

The following individuals are (1) officers or directors of SingTel USA and (2) officers or directors of one or more of the foreign carrier affiliates listed in the response to Question 17 above.

Officers or Directors	Foreign Affiliates
Allen Lew Yoong Keong	Singapore Telecom Japan Co., Ltd. SingTel Taiwan Limited
Sanjiv Kumar Aiyar	Singapore Telecom Japan Co., Ltd. Singapore Global (India) Private Limited Information Network Services Sdn Bhd SingTel Taiwan Limited

Annex A

Complete List of SingTel USA Foreign Carrier Affiliates

Notes:	Name of the Affiliated Carrier:	Country:
	Optus Data Centres Pty Limited	Australia
	Optus Mobile Pty Limited	Australia
	Optus Networks Pty Limited	Australia
	Optus Vision Pty Limited	Australia
	Simplus Mobile Pty Limited	Australia
	Source Integrated Networks Pty Limited	Australia
	Uecomm Operations Pty Limited	Australia
	Virgin Mobile (Australia) Pty Limited	Australia
	XYZed Pty Limited	Australia
	Singapore Telecom Japan Co., Ltd.	China
	GB21(Hong Kong) Limited	Hong Kong
	Singapore Telecom Hong Kong Limited	Hong Kong
	Singapore Telecom Japan Co., Ltd.	Hong Kong
	Singapore Global (India) Private Limited	India
	Singapore Telecom Japan Co., Ltd.	India
	Singapore Telecom Japan Co., Ltd.	Indonesia
	Singapore Telecom Japan Co., Ltd.	Japan
	Information Network Services Sdn Bhd	Malaysia
	Singapore Telecom Japan Co., Ltd.	Malaysia
1	Singapore Telecommunications Limited	Singapore
	Singapore Telecom Korea Limited	South Korea
	Lanka Communications Services (Private) Limited	Sri Lanka
	Singapore Telecom Japan Co., Ltd.	Taiwan
	SingTel Taiwan Limited	Taiwan
	ST-2 Satellite Ventures Private Limited	Taiwan
	Singapore Telecom Japan Co., Ltd.	Thailand
	Singapore Telecom Japan Co., Ltd.	United Kingdom
	SingTel (Europe) Limited	United Kingdom

Notes

1. Since SingTel USA is regulated as dominant on the U.S.-Singapore route by virtual of its affiliation with Singapore Telecommunications Limited, not all affiliated companies in Singapore are listed.