

GTI Corporation
Foreign Carrier Affiliation Notification
26 Nov 2012

ATTACHMENT

Response to Question 10

GTI Corporation (“GTI”) files this notification pursuant to 47 C.F.R. §§ 63.11(b)(1)(i) and (b)(2)(i). As GTI as previously certified, Singapore Telecommunications International Private Ltd. (“SingTel International”) owns approximately 47 percent of the common shares of GTI’s indirect parent, Globe Telecom, Inc. (“Globe”).¹ Since the Commission authorized GTI in 2010 to provide international telecommunications services,² GTI has become affiliated with additional foreign carriers as a consequence of transactions undertaken by SingTel International’s direct and indirect parent companies.

GTI was not notified by SingTel International of these foreign affiliations. SingTel International does not control GTI or Globe.³ GTI relied on publicly available information to determine its foreign affiliations acquired through SingTel International.⁴

Response to Question 12(b)

¹ Application Under Section 214 of the Communications Act of 1934, as Amended, for Authority to Provide Global Facilities-Based and Global Resale Services Between the United States and All International Points Except Singapore, Australia, Bangladesh, India, Indonesia, and Pakistan, FCC File No. ITC-214-20090831-00403, at 4 (filed Aug. 31, 2009) (“GTI Application”).

² See *International Authorizations Granted*, Public Notice, 25 FCC Rcd. 1860, 1862 (Int’l Bur. 2010) (“GTI 214 Authorization”).

³ GTI Application at 4.

⁴ See, e.g., Singapore Telecom USA, Inc., Foreign Carrier Affiliation Notification, File No. FCN-NEW-20121109-00015 (filed Nov. 9, 2012).

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GTI presumes that its new foreign-carrier affiliates in China, Hong Kong, Japan, Korea, Malaysia, Philippines, Sri Lanka, Taiwan, Thailand, and the United Kingdom each own or lease facilities in their respective markets, but has no direct knowledge of these facts.

Response to Question 12(c)(1)

GTI is eligible for post-consummation notification of foreign affiliations pursuant to 47 C.F.R. §§ 63.11(b)(1)(i) and (b)(2)(i).

With respect to the carriers identified by an asterisk (*) in Table 1 below, GTI is entitled to retain non-dominant status on the associated international routes pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.11(b)(1)(i). The Commission has previously acknowledged that these carriers lack market power in their respective geographic markets.⁵ Each of these foreign carriers has less than 50-percent market share in either the international transport market or local access market of its respective geographic market. None of these newly-affiliated foreign carriers has since appeared on the Commission's list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets.⁶

⁵ See North American Communications Limited, International Section 214 Authorization, Application for Transfer of Control, File No. ITC-T/C-20091009-00441 (disclosing foreign carrier affiliations resulting from control of Global Crossing Limited by a subsidiary of Temasek Holdings (Private) Limited—which controls SingTel International—and requesting non-dominant treatment on all routes except the U.S.-Singapore and U.S.-Ireland routes); *International Authorizations Granted*, Public Notice, 24 FCC Rcd. 13,706 (2009) (accepting notification and granting non-dominant treatment on all routes except the U.S.- Singapore and U.S.-Ireland routes).

⁶ 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) ("Foreign Market Power List").

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With respect to the other foreign carrier listed in Table 1 below (*i.e.*, TeleChoice Philippines, Inc.), GTI is entitled to retain non-dominant status on the associated international route pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.11(b)(2)(i). TeleChoice Philippines, Inc. lacks market power in its geographic market. It has less than 50-percent market share in either the international transport market or local access market of its respective geographic market. TeleChoice Philippines, Inc. does not appear on the Commission's list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets.⁷ GTI therefore continues to qualify for a presumption of non-dominance on the U.S.-Philippines route pursuant to 47 C.F.R. § 63.10(a)(3) and exemption from the dominant carrier safeguards in 47 C.F.R. §§ 63.10(c) through (e). GTI certifies that TeleChoice Philippines, Inc. is authorized to operate in the Philippines, which is a member of the World Trade Organization ("WTO").⁸

Response to Question 16

For the reasons set forth in response to Question 12(c)(1) above, GTI continues to qualify for and requests continued regulation as a non-dominant international carrier on all authorized routes, including routes for which it has new foreign-carrier affiliates. All of the foreign carrier affiliates listed in Table 1 below lack market power in WTO countries, entitling GTI to be classified presumptively as non-dominant. GTI did not seek and does not have authority to serve the U.S.-Singapore route.

⁷ *See id.*

⁸ *See* World Trade Organization, Members and Observers as of August 24, 2012, www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm ("WTO Member List").

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Response to Question 17

As required by 47 C.F.R. §§ 63.11(e)(1) and (2), GTI certifies that it is affiliated with the carriers listed in Table 1 below as of November 26, 2012.

TABLE 1

COUNTRY	AFFILIATED FOREIGN CARRIER	AUTHORIZED ACTIVITIES
China	Singapore Telecom Japan Co Ltd*	Telecommunications services
Hong Kong	GB21 (Hong Kong) Limited*	Telecommunications services
	Singapore Telecom Hong Kong Limited*	Telecommunications services
	Singapore Telecom Japan Co Ltd*	Telecommunications services
	StarHub (Hong Kong) Limited*	Telecommunications services
Japan	Singapore Telecom Japan Co Ltd*	Telecommunications services
Korea	Singapore Telecom Korea Limited*	Telecommunications services
Malaysia	Information Network Services Sdn Bhd*	Data and value-added network services
	Singapore Telecom (Malaysia) Sdn Bhd*	Telecommunications services
	Singapore Telecom Japan Co Ltd*	Telecommunications services
Philippines	TeleChoice Philippines, Inc.	Mobile telecommunications services
Sri Lanka	Lanka Communication Services (Pvt) Limited*	Data communication services
Taiwan	SingTel Taiwan Limited*	Telecommunications services
	ST-2 Satellite Ventures Private Limited*	Telecommunications services

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COUNTRY	AFFILIATED FOREIGN CARRIER	AUTHORIZED ACTIVITIES
China	Singapore Telecom Japan Co Ltd*	Telecommunications services
Thailand	Singapore Telecom Japan Co Ltd*	Telecommunications services
United Kingdom	SingTel (Europe) Limited*	Telecommunications services
	Singapore Telecom Japan Co Ltd*	Telecommunications services

* Denotes foreign carrier for which the Commission has previously acknowledged a lack of market power for affiliation purposes.

China, Hong Kong, Japan, Korea, Malaysia, Philippines, Sri Lanka, Taiwan, Thailand, and the United Kingdom are all WTO members.⁹

Response to Question 18

As required by 47 C.F.R. § 63.11(e)(3), GTI certifies that it is authorized to provide global facilities-based and global resale services to China, Hong Kong, Japan, Korea, Malaysia, Philippines, Sri Lanka, Taiwan, Thailand, and the United Kingdom pursuant to FCC File No. ITC-214-20090831-00403.¹⁰

Response to Question 19

As required by 47 C.F.R. § 63.11(e)(4), GTI certifies that it does not serve China, Hong Kong, Japan, Korea, Malaysia, Philippines, Sri Lanka, Taiwan, Thailand, or the United Kingdom

⁹ See WTO Member List.

¹⁰ See *GTI 214 Authorization*, 25 FCC Rcd. at 1862.

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solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

Response to Question 20

As required by 47 C.F.R. § 63.11(e)(5), GTI certifies that it has the following 10-percent-or-greater direct or indirect owners:

GTI Business Holdings, Inc.

Address: 5th Floor, Globe Telecom Plaza, Pioneer Street, Mandaluyong City, Philippines

Citizenship: Philippines

Principal Business: holding company

Relationship: GTI Business Holdings, Inc. owns 100 percent of GTI.

Globe Telecom, Inc. (“Globe”)

Address: 5th Floor, Globe Telecom Plaza (Pioneer Highlands), Pioneer corner Madison Streets, 1552 Mandaluyong City, Philippines

Citizenship: Philippines

Principal Business: telecommunications

Relationship: Globe owns 100 percent of GTI Business Holdings, Inc.

Singapore Telecommunications International Private Ltd. (“SingTel International”)

Address: 31 Exeter Road, Comcentre, Singapore 0923

Citizenship: Singapore

Principal Business: telecommunications

Relationship: SingTel International owns 47.3 percent of Globe’s common shares.

Ayala Corporation

Address: 33rd Floor, Ayala Tower One & Exchange Plaza, Ayala Triangle, Ayala Ave., Makati City, Philippines

Citizenship: Philippines

Principal Business: telecommunications

Relationship: Ayala Corporation owns 30.5 percent of Globe’s common shares.

Asiacom Philippines (“Asiacom”)

Address: 2nd Floor, Globe Telecom Plaza 1, Pioneer Highlands, Pioneer corner Madison Streets, Madaluyong City, Philippines 1552

Citizenship: Philippines

Principal Business: holding company

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Relationship: Asiacom Philippines owns 54.5 percent of Globe and 100 percent of Globe's preferred shares. SingTel International owns 40 percent of Asiacom and Ayala Corporation owns 60 percent of Asiacom.

Singapore Telecommunications Limited

Address: 31 Exeter Road, Comcentre, Singapore 0923

Citizenship: Singapore

Principal Business: holding company

Relationship: Singapore Telecommunications Limited owns 100 percent of SingTel International.

Temasek Holdings (Private) Limited (“Temasek”)

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

Citizenship: Singapore

Principal Business: investment holding company

Relationship: Temasek owns 51.96 percent of SingTel.

Temasek is wholly owned by the Government of Singapore through the Ministry for Finance.

Note that the public also owns 22 percent of Globe's common shares.

Response to Question 21

GTI has no interlocking directorates with the foreign affiliates identified in this notification.