

**ATTACHMENT**

**Response to Question 10:**

Level 3 International, Inc. (“Level 3 International”), makes this notification pursuant to 47 C.F.R. § 63.11(b)(2)(i). Level 3 International’s indirect parent company, Level 3 Communications, Inc., has established new subsidiaries to operate as competitive carriers in Estonia, Russia, and South Africa.

**Response to Question 12(b):**

Level 3 International’s new foreign-carrier affiliates all own or lease facilities in their respective markets.

**Response to Question 12(c)(1):**

Level 3 International is entitled to retain non-dominant status on its newly affiliated routes pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.11(f). Level 3 International’s new foreign-carrier affiliates lack market power in their respective markets. As new entrants in the their respective market, Level 3 International’s newly-affiliated foreign carriers have negligible market share, and lack 50-percent market share in either the international transport market or local access market of their respective geographic markets. These newly-affiliated foreign carriers do not appear on the Commission’s list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets.<sup>1</sup> These foreign carriers

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<sup>1</sup> 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).

therefore qualify for presumptions of non-dominance pursuant to 47 C.F.R. § 63.10(a)(3) and exemptions from the dominant carrier safeguards in 47 C.F.R. § 63.10(c)-(e).

**Response to Question 16:**

Level 3 International requests continued regulation as a non-dominant international carrier pursuant to 47 C.F.R. § 63.10.

**Response to Question 17:**

Level 3 International's newly-affiliated foreign carriers are authorized to provide Internet protocol, data transport, and related services in their respective jurisdictions.

<b>AFFILIATED FOREIGN CARRIER</b>	<b>COUNTRY</b>	<b>DATE OF LICENSING/ COMMENCEMENT OF SERVICE</b>
Level 3 Communications Estonia OÜ	Estonia	Licensed on March 6, 2013; service to commence in December 2013
OOO "Level 3 Communications"	Russia	Licensed on March 25, 2013; service to commence in December 2013
Level 3 Communications South Africa (Pty) Limited	South Africa	Licensed on July 6, 2012; service commenced in May 2013

Estonia, Russia, and South Africa are all members of the World Trade Organization ("WTO").<sup>2</sup>

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<sup>2</sup> See World Trade Organization, Members and Observers as of Mar. 2, 2013, [www.wto.org/english/thewto\\_e/whatis\\_e/tif\\_e/org6\\_e.htm](http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm).

**Response to Question 18:**

As required by 47 C.F.R. § 63.11(e)(3), Level 3 International certifies that it is authorized to provide global facilities-based and global resale services to Estonia, Russia, and South Africa pursuant to FCC File No. ITC-214-19981214-00867.<sup>3</sup>

**Response to Question 19:**

As required by 47 C.F.R. § 63.11(e)(4), Level 3 International certifies that it does not serve Estonia, Russia, or South Africa 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), Level 3 International certifies that it has the following 10-percent-or-greater direct or indirect owners:

**Level 3 Financing, Inc.**

*Address:* 1025 Eldorado Blvd., Broomfield, Colorado 80021

*Citizenship:* Delaware, USA

*Principal Business:* holding company

*Relationship:* owns 100 percent of Level 3 International

**Level 3 Communications, Inc. (“Level 3 Parent”)**

*Address:* 1025 Eldorado Blvd., Broomfield, Colorado 80021

*Citizenship:* Delaware, USA

*Principal Business:* telecommunications

*Relationship:* owns 100 percent of Level 3 Financing, Inc.

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<sup>3</sup> See *Overseas Common Carrier Section 214 Applications and Section 310(b)(4) Actions Taken, Public Notice*, 14 FCC Rcd. 4996 (Int’l Bur. 1999).

**Southeastern Asset Management, Inc. (“SAM”)**

*Address:* 6410 Poplar Avenue, Suite 900, Memphis, Tennessee 38119

*Citizenship:* Tennessee, USA

*Principal Business:* investment advisory services

*Relationship/Interest:* SAM holds sole or shared voting rights for 21.94 percent of outstanding shares of Level 3 Parent that are otherwise owned by other entities for whom SAM acts as an investment advisor. None of SAM’s owners holds a ten-percent-or-greater direct or indirect interest in Level 3 Parent.

**STT Crossing Ltd (“STT Crossing”)**

*Address:* 10 Frere Felix de Valois Street, Port Louis, Mauritius

*Citizenship:* Mauritius

*Principal Business:* holding company

*Relationship:* owns approximately 24.926 percent of Level 3 Parent

**STT Communications Ltd (“STT Communications”)**

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

*Citizenship:* Singapore

*Principal Business:* information communications

*Relationship:* owns 100 percent of STT Crossing

**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:* owns 100 percent of STT Communications

**Temasek Holdings (Private) Limited (“Temasek”)**

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

*Citizenship:* Singapore

*Principal Business:* investment holding company

*Relationship:* owns 100 percent of ST Telemedia

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

**Response to Question 21:**

Level 3 International has no interlocking directorates with the foreign affiliates identified in this notification.