

ATTACHMENT

Response to Question 10:

Global Crossing Americas Solutions, Inc. (“GCAS”), makes this notification pursuant to 47 C.F.R. § 63.11(b)(2)(i). GCAS’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):

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

Response to Question 12(c)(1):

GCAS 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). GCAS’s new foreign-carrier affiliates lack market power in their respective markets. As new entrants in the their respective market, GCAS’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.¹ These foreign carriers therefore qualify for presumptions of non-

¹ See *Int’l Bureau Revises and Reissues the Comm’n’s List of Foreign Telecomm. Carriers that Are Presumed to Possess Mkt. Power in Foreign Telecomm. Mkts.*, Public Notice, 22 FCC Rcd. 945 (Int’l Bur. 2007).

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:

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

Response to Question 17:

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

AFFILIATED FOREIGN CARRIER	COUNTRY	DATE OF LICENSING/ COMMENCEMENT OF SERVICE
Level 3 Communications Estonia OÜ	Estonia	Licensed on March 6, 2013; service commenced in December 2013
OOO "Level 3 Communications"	Russia	Licensed on March 25, 2013; service commenced 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").²

² 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.

Response to Question 18:

As required by 47 C.F.R. § 63.11(e)(3), GCAS certifies that it is authorized to serve Estonia, Russia, and South Africa pursuant to the following international Section 214 authorizations:

- FCC File Nos. ITC-214-19950717-00062 (old FCC File No. ITC-95-434), granting GCAS authority to provide certain common-carrier services using satellite facilities);
- FCC File No. ITC-214-19950831-00047 (old FCC File No. ITC-95-485), granting GCAS authority to provide global resale services pursuant to 47 C.F.R. § 63.18(e)(2); and
- FCC File No. ITC-214-19970703-00372 (old FCC File No. ITC-97-399), granting GCAS authority to provide global facilities-based and global resale services pursuant to 47 C.F.R. §§ 63.18(e)(1), (2).

Response to Question 19:

As required by 47 C.F.R. § 63.11(e)(4), GCAS 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), GCAS certifies that it has the following 10-percent-or-greater direct or indirect owners:

Impsat Fiber Networks, Inc.

Address: Elvira Rawson de Dellepiane, 150 Piso 8, C1107 BCA, Buenos Aires, Argentina

Citizenship: Delaware

Principal Business: holding company

Relationship: owns 100 percent of GCAS

GC Impsat Holdings II Ltd.

Address: 10 Fleet Place, 7th Floor, London EC4M 7RB, England

Citizenship: United Kingdom

Principal Business: holding company

Relationship: owns 100 percent of Impsat Fiber Networks, Inc.

GC Impsat Holdings I Ltd.

Address: 10 Fleet Place, 7th Floor, London EC4M 7RB, England

Citizenship: United Kingdom

Principal Business: holding company

Relationship: owns 100 percent of GC Impsat Holdings II Ltd.

Level 3 Communications (IMPSAT) Nederland B.V. (f/k/a GC Impsat Holdings Nederland B.V.)

Address: 10 Fleet Place, 7th Floor, London EC4M 7RB, England

Citizenship: Netherlands

Principal Business: holding company

Relationship: owns 100 percent of GC Impsat Holdings I Ltd.

Level 3 GC Limited

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: holding company

Relationship: owns 100 percent of Level 3 Communications (IMPSAT) Nederland B.V.

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 GCL Limited

Level 3 Communications, Inc.

Address: 1025 Eldorado Blvd., Broomfield, Colorado 80021

Citizenship: Delaware, USA

Principal Business: telecommunications

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

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 Communications, Inc., 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 Communications, Inc.

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 Communications, Inc.

STT Communications Ltd

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

Citizenship: Singapore

Principal Business: information communications

Relationship: owns 100 percent of STT Crossing Ltd

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 Ltd

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:

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