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March 5, 2015

**VIA IBFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554  
Attn: International Bureau

Re: IB File No. FCN-NEW-20150130-00002  
Foreign Carrier Affiliation Notification of ITC Global USA, LLC

**SUPPLEMENT**

Dear Ms. Dortch:

On behalf ITC Global USA, LLC (“ITC Global”), the letter Supplements the above-referenced Foreign Carrier Affiliation Notification (“FCAN”) to include an additional foreign carrier affiliate, ITC Chile S.A. (“ITC-Chile”), which has a foreign telecommunications license. Specifically, on April 10, 2012, ITC-Chile was issued Decree No. 64 by the Ministerio de Transportes y Telecomunicaciones; Subsecretaría de Telecomunicaciones of Chile to provide data services using VSAT earth stations. As a result, ITC Global became affiliated with a foreign carrier in Chile.

ITC Global, therefore, supplements its responses to the following questions:

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**Supplemental Response to Questions 4, 12, 16 and 17**

ITC Global provides notification of its affiliation with the following additional foreign carrier:

Country Where Service Provided	Foreign Carrier Affiliate Name	Description of the Company
Chile (WTO Member)	ITC Global Chile S.A. ("ITC-Chile")  A Chilean entity.	ITC-Chile is a wholly owned direct subsidiary of ITC Global, Inc.  ITC-Chile holds a license (Decree No. 64) from the Ministerio de Transportes y Telecomunicaciones; Subsecretaría de Telecomunicaciones of Chile to provide data services using VSAT earth stations. Pursuant to this license, ITC-Chile provides data services via satellite to mining and exploration companies. ITC-Chile has a market share of less than 5% of the telecommunications market in Chile.

ITC Global requests continued classification as a nondominant carrier under Section 63.10 of the Commission's Rules on any route between the United States and Chile. ITC-Chile lacks 50 percent market share in the international transport and local access markets on the foreign end of the route and thus lacks sufficient market power on the foreign end to adversely affect competition in the U.S. market. Accordingly, pursuant to Section 63.10(a)(3), ITC Global is presumptively classified as non-dominant on this route.

**Supplemental Response to Question 19**

To the extent that ITC Global provides the service between the United States and Chile, ITC Global provides such services between the United States and the affiliates' countries only through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

**Supplemental Response to Question 21:**

The officers and directors of ITC-Chile are as follows

- Directors: Joseph Spytek; Luis Antonio Ljubetic Villanueva; and Jorge Abud Bannen
- Officers: Jorge Abud Bannen – President; Luis Antonio Ljubetic Villanueva – General Manager

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ITC Global requests that the Commission include ITC-Chile in its review of the above-referenced FCAN. Should you have any questions regarding this information, please do not hesitate to contact us.

Respectfully submitted,

*/s/ Brett P. Ferenchak*

Catherine Wang  
Brett P. Ferenchak

Counsel to ITC Global USA, LLC