

**Attachment 1**

**Question 5 – Countries of affiliation**

By this filing, Telstra Incorporated (“Telstra USA”) notifies the FCC of affiliations with foreign carriers in Japan, Hong Kong, Singapore, South Korea, Malaysia, Taiwan, Philippines, India, China and Thailand.

**Question 12.c.1 – Non-dominant carrier demonstration**

Telstra USA is currently regulated as non-dominant on the routes between the United States and each of Japan, Hong Kong, Singapore, South Korea, Malaysia, Taiwan, Philippines, India, China and Thailand. Telstra USA asks that it continue to be regulated as a non-dominant carrier on each of these routes. Continued non-dominant treatment is appropriate on these routes because Telstra USA’s foreign carrier affiliates in Japan, Hong Kong, Singapore, South Korea, Malaysia, Taiwan, Philippines, India, China and Thailand each lack a 50 percent market share in the international transport and local access market.

**Question 16 – Appropriateness of continued non-dominant treatment**

Continued non-dominant treatment is appropriate for Telstra USA on the routes between the United States and each of Japan, Hong Kong, Singapore, South Korea, Malaysia, Taiwan, Philippines, India, China and Thailand since Telstra USA’s affiliates on these routes lack market power in the international transport and local access market.

**Question 17 – Foreign carrier affiliates that are the subject of this Notification**

By this Notification, Telstra USA advises the FCC that Telstra USA is affiliated with the following foreign carriers:

<b>Name of the Affiliated Carrier:</b>	<b>Country:</b>	<b>Date of Affiliation:</b>
Pacnet Business Solutions China Ltd. (unofficial English name) <b>太平洋电信（深圳）股份有限公司</b>	China	April 16, 2015
Pacnet Internet (HK) Limited	Hong Kong	April 16, 2015
Pacnet Global (HK) Limited	Hong Kong	April 16, 2015
Pacnet Services Asia Pacific (HK) Limited	Hong Kong	April 16, 2015
Pacnet Cable (HK) Limited	Hong Kong	April 16, 2015
Pacific Internet India Private Limited	India	April 16, 2015
Pacnet Services (Japan) Corp.	Japan	April 16, 2015
Pacnet Global (Malaysia) Sdn. Bhd.	Malaysia	April 16, 2015
Digitel Crossing, Inc.	Philippines	April 16, 2015
Pacnet Global (Singapore) Pte. Ltd.	Singapore	April 16, 2015
Pacnet Internet (S) Pte. Ltd.	Singapore	April 16, 2015
Dacom Crossing Corporation	South Korea	April 16, 2015
Iljin C2C Limited	South Korea	April 16, 2015
Pacnet Services (Korea) Ltd.	South Korea	April 16, 2015
Pacnet Services (Taiwan) Inc.	Taiwan	April 16, 2015
Pacnet Cable (Taiwan) Ltd.	Taiwan	April 16, 2015
Pacnet Internet (Thailand) Limited	Thailand	April 16, 2015
World Net & Services Co., Ltd.	Thailand	April 16, 2015

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

Telstra USA holds international Section 214 authority to provide facilities-based and resold international telecommunications services. *See* File Nos. ITC-214-19970610-00320 (old file no. ITC-97-320) (facilities-based service between the U.S. and Australia); ITC-214-19970610-00321 (old file no. ITC-97-319) (facilities-based service between the U.S. and all approved international points, except Australia); ITC-214-19960610-00238 (old file no. ITC-96-321) (resold switched and non-interconnected private line services between the U.S. and all approved international points, except Australia); ITC-214-19960610-00241 (old file no. ITC-96-320) (international simple resale services between the U.S. and all approved international points); ITC-214-19960610-00240 (old file no. ITC-96-319) (international simple resale and resold switched and private line services between the U.S. and Australia).

Question 19 – Countries served solely through resale of unaffiliated carriers

Telstra USA does not serve Japan, Hong Kong, Singapore, South Korea, Malaysia, Taiwan, Philippines, India, China or Thailand solely through the resale of the international switched services of unaffiliated U.S. facilities-based carriers.

Question 20 – Ownership information

Telstra USA is a wholly-owned subsidiary of Telstra Holdings, an Australian company and a holding company. Telstra Holdings' address is as follows:

Telstra Holdings Pty Limited (ABN 33 057 808 938)  
Level 41, 242 Exhibition Street  
Melbourne, VIC 3000  
Australia

Telstra Holdings is wholly owned by an Australian telecommunications company, Telstra Corporation Limited (ABN 33 051 775 556) ("Telstra"). The address of Telstra is as follows:

Telstra Corporation Limited (ABN 33 051 775 556)  
Level 25, 242 Exhibition Street  
Melbourne, VIC 3000  
Australia

The following three entities hold 10 percent or more of the outstanding stock of Telstra:

1. HSBC Custody Nominees (Australia) Limited  
Address: HSBC Centre  
Level 32, 580 George Street  
Sydney, NSW 2000  
Citizenship: Australia  
Principal business: Asset management company  
Equity percentage: 14.93%
  
2. J.P. Morgan Nominees Australia Ltd.  
Address: Level 26, Grosvenor Place  
225 George Street  
Sydney, NSW 2000  
Citizenship: Australia  
Principal business: Asset management company  
Equity percentage: 12.30%
  
3. National Nominees Limited  
Address: Level 12, 500 Bourke Street

Melbourne, VIC 3000  
Citizenship: Australia  
Principal business: Asset management company  
Equity percentage: 11.92%

Question 21 – Interlocking directors

Martijn Blanken and Douglas James Rogerson are directors of Telstra USA. Both Martijn Blanken and Douglas James Rogerson are also directors of the following foreign carrier affiliates of Telstra USA:

- Pacnet Global (HK) Limited
- Pacnet Cable (HK) Limited
- Pacnet Internet (HK) Limited
- Pacnet Services Asia Pacific (HK) Limited

Martijn Blanken is also a director of the following foreign carrier affiliates of Telstra USA:

- Pacnet Business Solutions China Ltd. (unofficial English name)
- Pacnet Global (Malaysia) Sdn. Bhd.
- Pacnet Global (Singapore) Pte. Ltd.
- Pacnet Internet (S) Pte. Ltd.
- Pacnet Services (Taiwan) Inc.
- Pacnet Cable (Taiwan) Ltd
- Pacnet Internet (Thailand) Limited
- World Net & Services Co., Ltd.

Douglas James Rogerson is also a director of the following foreign carrier affiliates of Telstra USA:

- Pacnet Services (Japan) Corp.
- Pacnet Services (Korea) Ltd.
- Dacom Crossing Corporation
- Iljin C2C Limited

**Telstra Incorporated**  
**Foreign Carrier Affiliation Notification**  
**Annex A**

**Complete List of Telstra USA Foreign Carrier Affiliates**

<b>Notes:</b>	<b>Name of the Affiliated Carrier:</b>	<b>Country:</b>
1	Telstra Corporation Limited	Australia
	Pacnet Business Solutions China Ltd. (unofficial English name) <b>太平洋电信（深圳）股份有限公司</b>	China
	REACH Services Asia Limited	Hong Kong
	CSL Limited	Hong Kong
	REACH Cable Networks Limited	Hong Kong
2	Telstra International Ltd	Hong Kong
	REACH Networks Hong Kong Limited	Hong Kong
	Telstra International HK Limited	Hong Kong
	Pacnet Internet (HK) Limited	Hong Kong
	Pacnet Global (HK) Limited	Hong Kong
	Pacnet Services Asia Pacific (HK) Limited	Hong Kong
	Pacnet Cable (HK) Limited	Hong Kong
	Telstra Telecommunications Private Limited	India
	Pacific Internet India Private Limited	India
	REACH Networks K.K.	Japan
3	Telstra Japan KK	Japan
	Pacnet Services (Japan) Corp.	Japan
4	Telstra Malaysia Sdn. Bhd.	Malaysia
	Pacnet Global (Malaysia) Sdn. Bhd.	Malaysia
5	Telstra Network Services NZ Ltd.	New Zealand
6	Telstra NZ Ltd	New Zealand
	Telstra International PNG Limited	Papua New Guinea
7	Telstra Philippines Inc.	Philippines
	Digitel Crossing, Inc.	Philippines
	REACH International Telecom (Singapore) Pte. Limited	Singapore
	Telstra Singapore Pte Ltd	Singapore
	Pacnet Global (Singapore) Pte. Ltd.	Singapore
	Pacnet Internet (S) Pte. Ltd.	Singapore
8	Telstra Services Korea Ltd.	South Korea
	Taihan REACH Limited	South Korea
	Dacom Crossing Corporation	South Korea
	Iljin C2C Limited	South Korea
	Pacnet Services (Korea) Ltd.	South Korea
	REACH Networks (Taiwan) Limited	Taiwan
	Telstra International (Aus) Limited	Taiwan
	Pacnet Services (Taiwan) Inc.	Taiwan

## Foreign Carrier Affiliation Notification

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	Pacnet Cable (Taiwan) Ltd.	Taiwan
9	Telstra (Thailand) Limited	Thailand
	Pacnet Internet (Thailand) Limited	Thailand
	World Net & Services Co., Ltd.	Thailand
	REACH Europe Ltd.	United Kingdom
	Telstra Limited	United Kingdom

### Notes

1. Since Telstra USA is regulated as dominant on the U.S.-Australia route by virtue of its affiliation with Telstra Corporation Limited, not all affiliated companies in Australia are listed.
2. Formerly known as REACH Global Services Limited.
3. Formerly known as Telstra Japan (Retail) K.K.
4. Formerly known as REACH Bandwidth Services Malaysia Sdn. Bhd.
5. Formerly known as REACH Network Services NZ Limited.
6. Formerly known as Telstra Limited.
7. Formerly known as REACH Networks Philippines Inc.
8. Formerly known as REACH Network Services Korea Limited.
9. Formerly known as Reach Communications Services (Thailand) Ltd.