

**TracFone Wireless, Inc.**  
**Foreign Carrier Affiliations Notification**  
**Attachment 1**

By this filing, TracFone Wireless, Inc. (“TracFone”) is notifying the Commission of its affiliation with the following foreign carriers: Claro CR Telecomunicaciones, S.A. (“Claro CR”); Compañía Dominicana de Teléfonos, S.A. (“Codetel”); and Claro Panamá, S.A. (“Claro Panamá”).

**Response to Question 10**

TracFone became affiliated with Claro CR, Codetel, and Claro Panamá more than thirty days prior to the filing of this foreign carrier affiliations notification, but the notification was apparently not filed previously due to administrative oversight. To the extent necessary, TracFone seeks a waiver 47 C.F.R. § 63.11(c).

**Response to Question 12**

**Claro CR**

Claro CR is authorized to provide wireless telecommunications service in Costa Rica, which is a World Trade Organization (“WTO”) member country. Claro CR owns facilities in Costa Rica. However, Claro CR lacks market power in Costa Rica and thus qualifies for a presumption of non-dominance under 47 C.F.R. § 63.10(a). The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.-Costa Rica route, including the international transport and local access markets. Claro CR is not on the Commission’s list of foreign carriers that are presumed to possess market power in its markets.<sup>1</sup> In addition, because TracFone sells international switched service solely through the resale of unaffiliated U.S. facilities-based carriers’ international switched services,

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<sup>1</sup> See *The 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, DA 07-233 (Jan. 26, 2007) (“Market Power List”).

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pursuant to 47 C.F.R. § 63.10(a)(4), TracFone is presumptively classified as non-dominant on its routes.

**Codetel**

Codetel, formerly known as Verizon Dominicana, is authorized to provide wireless and wireline telecommunications service in the Dominican Republic, which is a WTO member country. Codetel (identified as Verizon Dominicana) is listed on the Commission's Market Power List. However, because TracFone sells international switched service solely through the resale of unaffiliated U.S. facilities-based carriers' international switched services, pursuant to 47 C.F.R. § 63.10(a)(4), TracFone is presumptively classified as non-dominant on its routes.

**Claro Panamá**

Claro Panamá is authorized to provide wireless telecommunications service in Panama, which is a WTO member country. Claro Panamá owns facilities in Panama. Claro Panamá lacks market power in Panama and thus qualifies for a presumption of non-dominance under 47 C.F.R. § 63.10(a). The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.-Panama route, including the international transport and local access markets. Claro Panamá is not on the Commission's Market Power List. In addition, because TracFone sells international switched service solely through the resale of unaffiliated U.S. facilities-based carriers' international switched services, pursuant to 47 C.F.R. § 63.10(a)(4), TracFone is presumptively classified as non-dominant on its routes.

**Response to Question 16**

TracFone requests continued regulation as a non-dominant international carrier on the U.S.-Costa Rica, U.S.-Dominican Republic, and U.S.-Panama routes pursuant to 47 C.F.R. § 63.10. *See* Resposne to Question 12 above.

**Response to Question 17**

As stated in response to Question 12, Claro CR is authorized to provide wireless telecommunications service in Costa Rica, Codetel is authorized to provide wireless and wireline telecommunications service in the Dominican Republic, and Claro Panamá is authorized to provide wireless telecommunications service in Panama.

**Response to Question 18**

TracFone holds a Section 214 authorization (File No. ITC-214-20030401-00162) to resell the international switched telecommunications services of an unaffiliated facilities-based carrier to all global points, including Costa Rica, Dominican Republic, and Panama.

**Response to Question 19**

TracFone is authorized to provide global service, including service to Costa Rica, Dominican Republic, and Panama, solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

**Response to Question 20**

Name:	AMX USA Holding, S.A. de C.V. (“AMX USA Holding”)
Address:	Lago Zurich No. 245, Plaza Carso/Edificio Telcel, Piso 4 Colonia Ampliación Granada, C.P. 11529 Mexico City
Citizenship:	Mexico
Principal Business:	Holding company for telecommunications-related investments

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Ownership Interest:	100 percent direct interest in TracFone.
Name: Address: Citizenship: Principal Business: Ownership Interest:	Sercotel, S.A. de C.V. (“Sercotel”) Lago Zurich No. 245, Plaza Carso/Edificio Telcel, Piso 4 Colonia Ampliación Granada, C.P. 11529 Mexico City Mexico Holding company for telecommunications-related investments 100 percent direct interest in AMX USA Holding <sup>2</sup>
Name: Address: Citizenship: Principal Business: Ownership Interest:	América Móvil, S.A.B. de C.V. (“América Móvil”) Lago Zurich No. 245, Plaza Carso/Edificio Telcel, Piso 4 Colonia Ampliación Granada, C.P. 11529 Mexico City Mexico Holding company for telecommunications-related investments 100 percent direct interest in Sercotel <sup>3</sup>
Name: Address: Citizenship: Principal Business: Ownership Interest:	Slim Family c/o Alejandro Cantú Jiménez América Móvil Lago Zurich No. 245, Plaza Carso/Edificio Telcel, Piso 4 Colonia Ampliación Granada, C.P. 11529 Mexico City Mexico Investment 60.58 percent equity interest in América Móvil  América Móvil is a publicly traded corporation ( <i>sociedad anónima bursátil de capital variable</i> ) organized under the laws of México. As of December 31, 2015 and according to beneficial ownership reports filed with the U.S. Securities and Exchange Commission, Mr. Carlos Slim Helú and certain members of his immediate family (the “Slim Family”) – through their beneficial ownership held by: (i) a Mexican trust that holds AA shares and L shares for their benefit (the “Family Trust”); (ii) Inversora Carso, S.A. (formerly known as Inmobiliaria

<sup>2</sup> Sercotel owns directly 99.99 percent of AMX USA Holding. The remaining 0.01 percent is held by Amov IV, S.A. de C.V, a wholly owned indirect subsidiary of América Móvil.

<sup>3</sup> América Móvil owns directly 99.99 percent of Sercotel. The remaining 0.01 percent is held by Amov IV, S.A. de C.V, a wholly owned indirect subsidiary of América Móvil.

	<p>Carso, S.A. de C.V.); (iii) Control Empresarial de Capitales, S.A. de C.V. (a subsidiary of Inversora Carso, S.A. de C.V.); and (iv) their direct ownership of AA shares and L shares – hold approximately 60.58 percent equity interest and approximately 89.88 percent voting interest in América Móvil. Thus, although no individual member of the Slim Family directly or indirectly owns a 10 percent or greater equity interest in América Móvil, the controlling interest in América Móvil’s shares is held by the Slim Family, as the Commission has acknowledged.<sup>4</sup> There are no other beneficial owners of a 10 percent or greater equity interest in América Móvil.</p> <p>As of December 31, 2015, Class AA shares represented approximately 35.43 percent of América Móvil’s capital stock, and approximately 97.40 percent of América Móvil’s full voting shares. The majority of the outstanding AA shares are held directly or indirectly by the Slim Family. There are two other classes of shares –A shares and L shares. A shares are considered “full voting shares,” and, as of December 31, 2015, represented approximately 0.95 percent of América Móvil’s capital stock, and approximately 2.60 percent of América Móvil’s voting shares. L shares can only vote on certain limited matters, and represent approximately 63.62 percent of América Móvil’s capital stock as of December 31, 2015.</p>
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**Response to Question 21**

Alejandro Cantú Jiménez, TracFone Director, serves as director of Claro CR and Codetel.

Daniel Hajj Aboumrad, TracFone Director, serves as director of Codetel.

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<sup>4</sup> See *Verizon Communications Inc., Transferor, and América Móvil S.A. de C.V., Transferee, Application for Authority to Transfer Control of Telecomunicaciones de Puerto Rico, Inc.*, Memorandum Opinion and Order and Declaratory Ruling, 22 FCC Rcd 6195, ¶ 62 (2007).