

Attachment 1

Question 5 – Countries of affiliation

By this filing, Singapore Telecom USA, Inc. (“Singtel USA”) notifies the Commission of its affiliation with foreign carriers in Bangladesh, India, and Indonesia (the “Notified Routes”).

Question 10 – Late notification

This notification is being filed more than 30 days after consummation of the transactions resulting in affiliations with the foreign carriers. Singtel USA’s failure to file within the specified timeframe was inadvertent, and Singtel USA apologizes for any inconvenience caused by its failure to file this notification in a timely manner. Singtel USA notes that the affiliations reported herein are not affiliations required to be reported prior to consummation under 47 C.F.R. § 63.11(a). Furthermore, because Singtel USA qualifies for continued non-dominant treatment on the Notified Routes, this notification should not change the Commission’s regulatory treatment of Singtel USA.

Question 16 – Continued qualification for non-dominant status

Singtel USA should continue to be regulated as a non-dominant carrier, both on the Notified Routes and on all routes where it is currently so regulated. The foreign carrier affiliates listed in the response to Question 17, below, are not monopoly providers of communications services in their respective countries. *See* 47 C.F.R. § 63.10(a)(3). As required by the Commission’s rules regarding classification of U.S.-international carriers, 47 C.F.R. § 63.10, Singtel USA can demonstrate that the foreign carrier affiliates lack sufficient market power in their respective countries to affect competition adversely in the U.S. market. Pacific Bangladesh Telecom Limited, Bharti Airtel Limited, and PT Telekomunikasi Selular are not listed on the Commission’s List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets.¹ In addition, all three companies are primarily engaged in the provision of wireless phone and data services. As mobile wireless service providers, they lack sufficient market power to affect competition adversely in the U.S.² and do not control bottleneck facilities in their respective markets.³ Based on publicly available information, each carrier listed in the response to Question 17, below, holds less than 50 percent market share in facilities that are necessary for the provision of international services by U.S. telecommunications companies, including international transport and local access facilities in its respective market.

¹ *The Int’l Bureau Revises and Reissues the Commission’s List of Foreign Telecomm. Carriers that Are Presumed to Possess Market Power in Foreign Telecomm. Markets*, Public Notice, DA 07-233 (Jan. 26, 2007).

² *See In re 1998 Biennial Regulatory Review – Review of Int’l Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909, 4922 ¶ 29 (1999).

³ *See In re Rules and Policies on Foreign Participation in the U.S. Telecomm. Market*, 12 FCC Rcd 23891, 23952-54 ¶¶ 145-46 (1997); *In re Market Entry and Regulation of Foreign-Affiliated Entities*, 11 FCC Rcd 3873, 3917 ¶ 116 (1995).

Question 17 – Newly affiliated foreign carriers

By this filing, Singtel USA notifies the Commission that it is affiliated with the following foreign carriers:

Affiliated Carrier:	Country:	Date of Affiliation:
Pacific Bangladesh Telecom Limited	Bangladesh	June 2, 2005
Bharti Airtel Limited	India	Sept. 12, 2000
PT Telekomunikasi Selular	Indonesia	Oct. 31, 2001

For the Commission's convenience, a complete and current list of Singtel USA's foreign carrier affiliations is provided in Annex A to this Attachment. Annex A includes all foreign carrier affiliates for which Singtel USA has previously provided notice to the Commission (in applications or notifications), except those affiliates that are no longer in service.

Question 18 – Services Singtel USA is authorized to provide in the above countries

Singtel USA is authorized to provide switched and private-line international services on a facilities-based and resale basis between the U.S. and Bangladesh, India, and Indonesia based on the authorization in File No. ITC-214-19981005-00680, effective November 20, 1998. *See Overseas Common Carrier Section 214 Applications & Section 310(b)(4) Actions Taken*, DA 98-2396, 1998 WL 814463 (OHMSV Nov. 25, 1998).

Question 19 – Countries served solely through resale of services

Singtel USA serves none of the Notified Routes solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

Question 20 – Ownership information

Singtel USA is a wholly-owned direct subsidiary of Singapore Telecommunications Limited ("Singtel"), a corporation organized under the laws of Singapore. Singtel's registered office is at 31 Exeter Road, Comcentre, Singapore 239732. Singtel is principally engaged in the provision of local and international telecommunications services.

Temasek Holdings (Private) Limited ("Temasek") is Singtel's largest shareholder, holding 51% of issued shares as of March 31, 2015. Temasek is a state-owned investment holding company with interests in telecommunications, financial services, transportation, real estate and other industries. To the best of Singtel USA's knowledge and belief, Temasek holds ownership interests in other telecommunications and media companies in Singapore, including Singtel competitors. Temasek's address is 60B Orchard Road, #06-18 Tower 2, The Atrium @ Orchard, Singapore 238891.

No other stockholder holds 10 percent or more of the stock in Singtel. Singtel is publicly traded on the Singapore Exchange.

Question 21 – Interlocking directorates

There are no interlocking directorates between Singtel USA and the foreign carrier affiliates listed in the response to Question 17, above.

If you have any questions about this filing, please contact Brian Weimer at (202) 747-1930 or bweimer@sheppardmullin.com.

Annex A

Complete List of Singtel USA Foreign Carrier Affiliates

Name of Affiliated Carrier	Country or Countries
Optus Data Centres Pty Limited	Australia
Optus Mobile Pty Limited	Australia
Optus Networks Pty Limited	Australia
Optus Vision Pty Limited	Australia
Simplus Mobile Pty Limited	Australia
Source Integrated Networks Pty Limited	Australia
Uecomm Operations Pty Limited	Australia
Virgin Mobile (Australia) Pty Limited	Australia
Vividwireless Pty Ltd	Australia
XYZed Pty Limited	Australia
Pacific Bangladesh Telecom Limited	Bangladesh
Singapore Telecom Japan Co., Ltd.	China, Hong Kong, India, Indonesia, Japan, Malaysia, Taiwan, Thailand, United Kingdom
GB21 (Hong Kong) Limited	Hong Kong
Singapore Telecom Hong Kong Limited	Hong Kong
Bharti Airtel Limited	India
Singapore Global (India) Private Limited	India
PT Telekomunikasi Selular	Indonesia
Information Network Services Sdn Bhd	Malaysia
Singapore Telecommunications Limited ⁴	Singapore
Singapore Telecom Korea Limited	South Korea
Lanka Communications Services (Private) Limited	Sri Lanka
Singtel Taiwan Limited	Taiwan
ST-2 Satellite Ventures Private Limited	Taiwan
Singtel (Europe) Limited	United Kingdom

⁴ Since Singtel USA is regulated as dominant on the U.S.-Singapore route by virtue of its affiliation with Singapore Telecommunications Limited, not all affiliated companies in Singapore are listed.