

FOREIGN CARRIER AFFILIATION NOTIFICATION ATTACHMENT

Upon consummation of the GCI-Liberty transaction¹ on March 9, 2018, GCI Communication Corp. (“GCICC”) and its wholly-owned direct subsidiary, Unicom, Inc.,² became affiliated with foreign carriers in the countries listed below. GCICC—which is authorized to provide only resale international telecommunications services under the terms of its international Section 214 authorization—provides resale telecommunications services on the routes below only through the resale of the switched international telecommunications services of unaffiliated U.S. facilities-based carriers. GCICC therefore qualifies for presumptive non-dominant status under 47 C.F.R. § 63.10(a)(4). Consequently, GCICC is permitted to file this notification as a “post notification” under 47 C.F.R. § 63.11(b)(2)(i) for the affiliates listed below.

Question 5 – Countries for which carrier is notifying the Commission of an affiliation

GCICC notifies the Commission of its affiliation with the following foreign carriers in the following countries as of March 9, 2018, the date of consummation of the associated transaction:

Country	Foreign Carrier	Dominant Status?
Anguilla	Cable and Wireless (Anguilla) Limited	Y
Antigua & Barbuda	Cable & Wireless Antigua & Barbuda Limited	Y
	Kelcom International (Antigua & Barbuda) Ltd.	N
Austria	UPC Austria GmbH	N
Barbados	Cable & Wireless (Barbados) Limited	Y
	Columbus Telecommunications (Barbados) Limited	N
	Karib Cable Inc.	N
Belgium	Telenet Group Holding N.V.	N
Belize	ARCOS-1 USA, Inc.	N
Bonaire	Columbus Networks Bonaire, N.V.	N
British Virgin Islands	Cable and Wireless (British Virgin Islands) Limited	Y
Cayman Islands	Cable and Wireless (Cayman Islands) Limited	Y

¹ Consolidated Application for Consent to Transfer of Control of International and Domestic Section 214 Authority of General Communication, Inc. to GCI Liberty, Inc., ITC-T/C-20170501-00091.

² Unicom, Inc. previously notified the Commission pursuant to 47 C.F.R. § 63.21(h) that it relies on GCICC’s international Section 214 authorization. Accordingly, GCICC’s certifications in this response apply to Unicom, Inc., which—like GCICC—provides international service to the countries listed in response to Question 5 solely through the resale of unaffiliated U.S. facilities-based carriers’ international switched services and continues to do so after consummation of the transaction.

Country	Foreign Carrier	Dominant Status?
Chile	VTR GlobalCom SpA	N
Colombia	Columbus Networks de Colombia, Ltda.	N
	Columbus Networks Zona Franca Ltda.	N
	Lazus de Colombia S.A.S.	N
Costa Rica	Columbus Networks de Costa Rica S.R.L.	N
	Promitel Costa Rica S.A.	N
Curaçao	Columbus Communications Curaçao N.V.	N
	Columbus Networks Curaçao, N.V.	N
	Columbus Networks Netherlands Antilles, N.V.	N
Czech Republic	UPC Ceska Republica Sro	N
Dominica	Cable & Wireless Dominica Limited	Y
Dominican Republic	Columbus Networks Dominicana, S.A.	N
	CWC Cable & Wireless Communications Dominican Republic SA	Y
El Salvador	Columbus Networks Centroamerica, S. de R.L.	N
	Columbus Networks El Salvador S.A.	N
Germany	Unitymedia GmbH	N
Grenada	Cable & Wireless Grenada Limited	Y
	Columbus Communications (Grenada) Limited	N
Guatemala	Columbus Networks de Guatemala Limitada	N
Honduras	Columbus Networks de Honduras, S. de R.L.	N
Hungary	UPC Magyarország Kft	N
Ireland	Virgin Media Ireland Ltd	N
Jamaica	Cable & Wireless Jamaica Limited	Y
	Columbus Communications Jamaica Limited	N
	Columbus Networks Jamaica Limited	N
Mexico	Columbus Networks de Mexico S. de R.L. de C.V.	N
Montserrat	Cable and Wireless (West Indies) Limited	Y
Netherlands	VodafoneZiggo Group Holding BV	N
Nicaragua	Columbus Networks Nicaragua y Compañía Limitada	N
Panama	Cable & Wireless Panama S.A.	Y
	CWC WS Holdings Panama S.A.	Y
	Columbus Networks de Panama S.R.L.	N
	Promitel Panama S.A.	N
Peru	Lazus Peru S.A.C.	N
Poland	UPC Polska Sp. z.o.o.	N
Romania	UPC Romania Srl	N
St. Kitts & Nevis	Cable & Wireless St. Kitts & Nevis Limited	Y
St. Lucia	Columbus Communications (St. Lucia) Limited	N
	Tele (St. Lucia) Inc.	N

Country	Foreign Carrier	Dominant Status?
	Cable & Wireless (St. Lucia) Limited	Y
St. Vincent & the Grenadines	Cable & Wireless St. Vincent and the Grenadines Limited	Y
	Columbus Communications St. Vincent and the Grenadines Limited	N
Seychelles	Cable & Wireless (Seychelles) Limited	Y
Slovak Republic	UPC Broadband Slovakia sro	N
Switzerland	UPC Schweiz GmbH	N
Trinidad and Tobago	Columbus Communications Trinidad Limited	N
	Columbus Networks International (Trinidad) Limited	N
	Telecommunications Services of Trinidad and Tobago Limited	Y
Turks & Caicos Islands	Columbus Networks, Limited	N
	Cable and Wireless (TCI) Limited	Y
United Kingdom (England & Wales)	Virgin Media Limited	N
Venezuela	Columbus Networks de Venezuela, S.A.	N

Question 7 – Date of filing of Transfer of Control

The following transfer of control application, filed May 1, 2017, addressed the transaction giving rise to the affiliation with the foreign carriers:

Consolidated Application for Consent to Transfer of Control of International and Domestic Section 214 Authority of General Communication, Inc. to GCI Liberty, Inc., ITC-T/C-20170501-00091.

The Transfer of Control Application has been granted. *See Joint Application of General Communication, Inc. and GCI Liberty, Inc. for Consent to Transfer Control*, Memorandum Opinion and Order, 32 FCC Rcd. 9349 (Wireline Comp., Int’l, Media, and Wireless Telecomm’ns Burs. 2017).

Question 12 – Section 63.11(b) exceptions

GCICC qualifies for the exception in 63.11(b)(2)(i) because it is entitled to retain non-dominant classification on the newly affiliated routes pursuant to 47 C.F.R. § 63.10. GCICC—which is authorized to provide only resale international telecommunications services under the terms of its international Section 214 authorization—provides resale telecommunications services on the affiliated routes only through the resale of the switched international

telecommunications services of unaffiliated U.S. facilities-based carriers. Consequently, GCICC qualifies for presumptive non-dominant status under 47 C.F.R. § 63.10(a)(4).

Question 16 – Continued qualification for non-dominant status

GCICC requests continued regulation as a non-dominant international carrier pursuant to 47 C.F.R. § 63.10(a)(3) and (4).

The foreign carrier affiliates identified in response to Question 5 above with an “N” in the “Dominant Status?” column each satisfy the requirement of 47 C.F.R. 63.10(a)(3). Each of these foreign carrier affiliates holds significantly less than a 50% market share in the international transport and local access markets in its respective country. Moreover, none of these foreign carrier affiliates has any ability to discriminate against unaffiliated U.S. international carriers through the control of bottleneck services or facilities in its respective international market or appears on the Commission’s list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets.³ Accordingly, these foreign carrier affiliates are each presumed to lack sufficient market power on the international end of the route to affect competition adversely in the U.S. market.

Further, GCICC provides international service to the countries listed in response to Question 5 solely through the resale of unaffiliated U.S. facilities-based carriers’ international switched services and continues to do so after consummation of the transaction. GCICC therefore should continue to be classified as non-dominant under 47 C.F.R. § 63.10(a)(4). Pursuant to Section 63.10(a)(4), GCICC will notify the Commission in the event that it begins to re-sell the international switched services of carriers other than unaffiliated U.S. facilities-based carriers, including either a showing of qualification for non-dominant treatment or a commitment to comply with the dominant carrier obligations enumerated in 47 C.F.R. § 63.10(c).

Question 17 – Newly affiliated foreign carriers

See response to Question 5, above.

Question 18 – Services that GCICC is authorized to provide in the above countries

As required by 47 C.F.R. § 63.11(e)(3), GCICC certifies that it is authorized to provide global resale services to the countries listed above pursuant to FCC File No. ITC-214-19960116-00009 (old File No. ITC-96-033); ITC-ASG-20080821-00395.

³ FCC Foreign Market Power List.

Question 19 – Countries served solely through resale of services

As required by 47 C.F.R. § 63.11(e)(4), GCICC certifies that it serves the countries listed above solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

Question 20 – Ownership information

As required by 47 C.F.R. § 63.11(e)(5), GCICC certifies that it has the following 10-percent-or-greater direct or indirect owners:

GCI Holdings, LLC (“GCIH”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Citizenship: Delaware

Principal Business: holding company

Relationship: GCIH holds a 100-percent voting-and-equity interest in GCICC.

Ventures Holdco, LLC (“Ventures Holdco”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Citizenship: Delaware

Principal Business: holding company

Relationship: Ventures Holdco holds a 100-percent voting-and-equity interest in GCIH.

GCI, LLC (“GCI”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Citizenship: Alaska

Principal Business: holding company

Relationship: GCI holds a 100-percent voting-and-equity interest in Ventures Holdco.

GCI Liberty, Inc. (“GCI Liberty”)

Address: 12300 Liberty Boulevard, Englewood, Colorado 80112

Citizenship: Alaska, to be reincorporated in Delaware upon shareholder approval.

Principal Business: holding company

Relationship: GCI Liberty holds a 100-percent voting-and-equity interest in GCI.

Dr. John C. Malone

Address: c/o GCI Liberty, Inc., 12300 Liberty Boulevard, Englewood, CO 80112

Citizenship: USA

Principal Business: telecommunications and investments

Relationship: Dr. Malone is projected to hold a 25.63-percent voting interest and a 3.7-percent equity interest in GCI Liberty.

No other person or entity holds a 10-percent-or-greater direct or indirect voting or equity interest in GCICC.

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Question 21 – Interlocking directorates

None of the directors of GCICC performs the duties of officer or director for any foreign carrier.