

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 two foreign carriers in the Bahamas, Columbus Communications Limited (“CCL”) and The Bahamas Telecommunications Company Limited (“BTC”). Because the Bahamas is not yet a WTO member, GCICC recognizes that it should have filed this notification prior to consummation; GCICC inadvertently failed to file its foreign carrier affiliation for BTC and CCL before consummation.

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

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

| Country | Foreign Carrier | Dominant Status? |
|----------------------|--|------------------|
| Bahamas ³ | The Bahamas Telecommunications Company Limited | Y |
| | Columbus Communications Limited | 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 CCL and BTC, each a foreign carrier:

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.

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 Bahamas solely through the resale of unaffiliated U.S. facilities-based carriers’ international switched services and continues to do so after consummation of the transaction.

³ Although the Bahamas is in the process of acceding to the World Trade Organization, it is not yet a member. See World Trade Organization, Bahamas—Accession Status (last visited December 7, 2017), https://www.wto.org/english/thewto_e/acc_e/a1_bahamas_e.htm.

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 9 – Time for filing prior notification

GCICC recognizes that it should have filed as a prior notification for its affiliation with BTC and CCL. GCICC inadvertently missed filing the notification at least forty-five business days prior to consummation.

Question 14 – Foreign carrier market power in destination markets

GCICC has responded “no” to Question 14 with respect to BTC, which holds greater than 50 percent of the international transport, intercity, and local telecommunications markets in the Bahamas. Please see response to Question 15, below.

Columbus Communications Limited (“CCL”)—the other foreign carrier affiliate in the Bahamas—however, lacks market power in the Bahamas. CCL satisfies the requirement of 47 C.F.R. § 63.10(a)(3). CCL lacks 50 percent market share in the international transport and the local access markets in the Bahamas. CCL also has no ability to discriminate against unaffiliated U.S. international carriers through the control of bottleneck services or facilities in the Bahamas, and CCL does not appear on the Commission’s list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets.⁴

Question 15 – Public Interest Showing

It continues to serve the public interest for GCICC to operate on the U.S.-Bahamas route. The FCC has already approved the GCI-Liberty transaction, including for the U.S.-Bahamas route, as being in the public interest.⁵ As explained below in response to Question 16, GCICC continues to qualify for non-dominant status on the U.S.-Bahamas route. GCICC provides international service to the Bahamas solely through the resale of unaffiliated U.S. facilities-based carriers’ international switched services and continues to do so after consummation of the transaction. As a reseller of international switched services, GCICC currently offers its

⁴ *See 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, 22 FCC Rcd. 945 (Int’l Bur. 2007) (“FCC Foreign Market Power List”).

⁵ *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).

customers the ability to place calls to the Bahamas. It serves the public interest for GCICC to continue to provide this service to its customers without interruption.

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) for CCL and (a)(4) for both CCL and BTC. GCICC provides international service to the Bahamas 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 Bahamas pursuant to FCC File No. ITC-214-19960116-00009 (old File No. ITC-96-033); ITC-ASG-20080821-00395.

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 Bahamas 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.

Question 21 – Interlocking directorates

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