

ATTACHMENT 1

France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA (“FTLD”) hereby submits this Foreign Carrier Affiliation Notification (“FCAN”) pursuant to Section 63.11 of the Federal Communications Commission’s (“FCC’s”) Rules, 47 C.F.R. § 63.11.

A chart including all new foreign carrier affiliates is provided under Attachment 2.

Response to Question 10:

All affiliations with the carriers listed in Attachment 2 were consummated prior to 2018. This filing is the result of an internal regulatory due diligence exercise conducted during 2018 where FTLD researched what, if any, foreign carrier affiliations it had acquired. As a result of this exercise, FTLD is providing the FCC with the required notification. To the extent a waiver of Section 63.11(c)’s filing deadline may be required, FTLD hereby requests it.

Please note that all new affiliations listed in Attachment 2 are new market entrants (mainly new mobile operators or enterprise customer service providers). None of the listed affiliates have “market power” in each respective country.

Further, all listed countries are members of the World Trade Organization (“WTO”). In fact, FTLD has already notified the FCC of having different foreign carrier affiliates in many of the countries in Attachment 2. None of the foreign carrier affiliates identified in the attached chart are subsidiaries of FTLD. Rather, all carriers listed are direct or indirect subsidiaries of FTLD’s ultimate parent company, Orange S.A. (“OSA”), or through its wholly owned subsidiary Globecast S.A. (“Globecast”) and its Orange Business Services (“OBS”) line of business subsidiaries.

Response to Questions 12 and 16:

The foreign carriers listed in Attachment 2 may own or control facilities in the countries in which they are authorized to operate. Those carriers listed under “affiliations through Orange S.A.” are all mobile operators which may operate wireless and related equipment to provide mobile services to customers in their countries. Those carriers listed under “affiliations through Globecast” are all satellite service providers which may own earth stations or other related equipment to provide satellite services. Lastly, those carriers listed under “affiliations through Orange Business Services” are all enterprise customer service providers which may own Internet or related equipment to provide enterprise services. None of the listed affiliates own or control any bottleneck facilities or have a fifty percent or greater market share in the international transport and local access markets in any country. Accordingly, FTLD continues to qualify for non-dominant classification on all listed routes, with the exception of Mauritius. FTLD has already agreed to dominant carrier classification in Mauritius due to its previously notified affiliation with Mauritius Telecom (and not due to any new affiliation listed in Attachment 2). FTLD also agrees to provide switched services via resale of unaffiliated U.S. companies for services to the Central African Republic per its current Section 214 to provide service to that country.

Response to Question 17: See Attachment 2.

Response to Question 18:

FTLD is authorized to provide resold and facilities based services to all countries listed in Attachment 2. *See* International Authorizations Granted, Public Notice, File No. ITC-214-19991215-00782, -00783, and -00784 (Jan. 5, 2000).

Response to Question 19:

FTLD's Section 214 authorization is limited to the resale of international switched services of unaffiliated U.S. facilities-based carriers for the following countries listed in Attachment 2:

Central African Republic

Response to Question 20:

FTLD is 100% owned by Orange Participations Holding Inc. (f/k/a France Telecom Participations Holding, Inc.) which is wholly owned by Orange Participations U.S. Inc. (f/k/a France Telecom Participations U.S., Inc.) which is wholly owned by Orange S.A. (f/k/a France Telecom SA). The only shareholder of Orange S.A. with a greater than 10% interest is the the French Government (which holds a 13% shareholding stake in Orange S.A.).

The address for Orange Participations Holding Inc. and Orange Participations U.S. Inc. is:

13775 McLearen Road
Oak Hill, VA 20171

Both companies are holding companies.

The address for Orange S.A. is:

Orange SA
Headquarters: 78, rue Olivier de Serres, Paris 75015, France

Orange SA is a provider of telecommunications.

The address for the French Government is:

Agence des Participations de l'Etat
Ministère de l'Economie, des Finances et de l'Industrie
139, rue de Bercy – Teledoc 228
75572 Paris Cedex 12
France

Response to Question 21:

There are no interlocking directorates with any foreign carriers listed in Attachment 2.