

ATTACHMENT 1 TO FCC ELECTRONIC FORM
Foreign Carrier Affiliate Notification

CIH Telecommunications Americas, LLC (“CIH Americas”), as well as its wholly owned subsidiary Sencinet Inc. (“Sencinet” and, together with CIH Americas, “CIH”),¹ submit this foreign carrier affiliation notification pursuant to Section 63.11 of the Federal Communications Commission’s (“FCC”) Rules, 47 C.F.R. § 63.11. After receiving Commission approval as the transferee of control of Sencinet (formerly named BT LatAm Inc.²) in File No. ITC-T/C/-20200702-00111, CIH Americas on October 1, 2020 consummated that acquisition of control and thereby became affiliated with twelve foreign carriers in Latin America affiliated with Sencinet, all of which were named in the transfer of control application previously approved by the Commission. As CIH Americas certified in the transfer of control application, none of those foreign carriers are dominant in their market or affiliated with dominant carriers, and all of the associated foreign countries are WTO members.

Response to Question 5:

The names of the foreign carrier affiliates and the countries in which they are authorized to provide telecommunications services to the public are as follows:

BT Latam Argentina SA	Argentina
BT Latam Brasil Ltda	Brazil
BT Brasil Servicios de Telecomunicaciones	Brazil
BT Latam Colombia SA	Colombia
BT Latam Costa Rica SA	Costa Rica
BT Latam Dominicana SA	Dominican Republic
BT Latam El Salvador SA de CV	El Salvador
BT Latam Guatemala SA	Guatemala
BT Latam Honduras	Honduras
BT Latam Nicaragua SA	Nicaragua
BT Latam Panama Inc.	Panama
BT Latam Peru	Peru

Response to Question 7:

The following transfer of control application, filed July 2, 2020, addressed the transaction giving rise to the affiliation with the foreign carriers listed in Response to Question 5 above:

¹ Pursuant to 47 C.F.R. § 63.21(h), CIH Americas has submitted a notification of provision of international telecommunications services through Sencinet in File No. ITC-214-20200731-00152.

² Pursuant to 47 C.F.R. § 63.21(i), Sencinet has submitted a notification of name change to the Commission in File No. ITC-214-20200731-00152.

In the Matter of Application of BT Americas Holdings Inc., Transferor, and CIH Telecommunications Americas, LLC, Transferee, for Consent to Transfer Control of BT LatAm Inc., Pursuant to Section 214 of the Communications Act of 1934, ITC-T/C-20200702-00111.

The Commission granted the transfer of control application on August 14, 2020. *See* Public Notice: *International Applications Granted*, DA No. 20-906 (Aug. 20, 2020), p. 2. The transfer of control was consummated on October 1, 2020, and CIH filed a notice of consummation on October 30, 2020. *See* File No. CONSMT-20201030-00107.

Response to Question 16:

CIH certifies as follows:

All of the countries listed herein are WTO Member countries.

The following foreign carrier affiliates own “facilities” pursuant to Section 63.11(b)(1)(ii), 47 C.F.R. § 63.11(b)(1)(ii), in their respective countries: BT Latam Argentina SA (Argentina); BT Latam Brasil Ltda (Brazil); BT Brasil Servicios de Telecomunicaciones (Brazil); BT Latam Colombia SA (Colombia); BT Latam Costa Rica SA (Costa Rica); BT Latam Dominicana SA (Dominican Republic); BT Latam El Salvador SA de CV (El Salvador); BT Latam Guatemala SA (Guatemala); BT Latam Honduras (Honduras); BT Latam Nicaragua SA (Nicaragua); BT Latam Panama Inc. (Panama); BT Latam Peru (Peru).

Pursuant to Section 63.10(a)(3) of the Commission’s rules, 47 C.F.R. § 63.10(a)(3), CIH continues to qualify for non-dominant classification on the routes between the United States and the countries listed above because none of the affiliates listed, individually or taken together, hold market power on the foreign end of these routes.

None of the affiliates listed own or control any bottleneck facilities or have, individually or taken together, a fifty percent or greater market share in the international transport and local access markets in their respective countries. Moreover, none of the affiliates listed above are on the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets. *See* Public Notice, *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*, Jan. 26, 2007. Accordingly, pursuant to Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), CIH continues to qualify for non-dominant classification on the routes between the United States and the countries listed above.

Response to Question 17:

All of the foreign carriers listed in Response 5 above are newly affiliated foreign carriers, and are authorized to provide telecommunications services to the public in the following countries. For convenience, they are listed again here:

BT Latam Argentina SA	Argentina
BT Latam Brasil Ltda	Brazil
BT Brasil Servicios de Telecomunicaciones	Brazil
BT Latam Colombia SA	Colombia
BT Latam Costa Rica SA	Costa Rica
BT Latam Dominicana SA	Dominican Republic
BT Latam El Salvador SA de CV	El Salvador
BT Latam Guatemala SA	Guatemala
BT Latam Honduras	Honduras
CIH Telecomunicaciones De Mexico, S.A. de C.V.	Mexico
BT Latam Nicaragua SA	Nicaragua
BT Latam Panama Inc.	Panama
BT Latam Peru	Peru

Response to Question 18:

CIH holds international global Section 214 facilities-based and resale authority pursuant to File No. ITC-214-20200731-00152.

Response to Question 19:

CIH does not serve the countries listed above solely through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

Response to Question 20:

The following information is provided with respect to shareholders of 10% or greater of the equity interests of CIH Telecommunications Americas, LLC (“CIH Americas”) and Sencinet Inc. (“Sencinet”):

Sencinet is a Delaware corporation and is a direct, wholly owned subsidiary of CIH Americas.

CIH Americas, a limited liability company organized under the laws of the State of Delaware, is a direct, wholly owned subsidiary of CIH Telecommunications Holdings, LLC, a telecommunications holding company that is also a limited liability company organized under the laws of the State of Delaware.

CIH Telecommunications Holdings, LLC is a direct, wholly owned subsidiary of CIH Technology Holdings, LLC, a holding company that is a limited liability company organized under the law of the State of Delaware.

CIH Technology Holdings, LLC is directly, 50% owned by St. Paul International Development Company, LLC, an investment company that is a limited liability company organized under the law of the State of Delaware; CIH Technology Holdings, LLC is also directly, 50% owned by The Harmon 1999 Descendants’ Trust, a Virginia trust.

St. Paul International Development Company, LLC, is directly, majority owned (91%) by George M. Kappaz, a citizen of the United States.

The sole trustee of The Harmon 1999 Descendants' Trust of Timothy B. Harmon, a citizen of the United States.

Other than as set forth above, currently no person or entity, directly or indirectly, owns or controls a 10% or greater interest in either CIH Americas or Sencinet.

Response to Question 21:

There are no interlocking directorates between CIH Americas or Sencinet and any of the affiliated foreign carriers listed above.