

JoAnn Sutton

From: Morse, Robert [RMorse@wbklaw.com]
Sent: Wednesday, May 19, 2010 6:46 PM
To: JoAnn Sutton
Cc: Sumita Mukhoty; David Krech
Subject: RE: Qwest International Section 214 Authorization Surrender and Related Database "Cleanup" Issues
Follow Up Flag: Follow up
Flag Status: Red
Attachments: ITC-92-096_Grant.pdf

JoAnn –

Clarifying information for each of your inquiries follows below. As you know, publicly-available information and information in the FCC's own records concerning these authorizations is very limited in some cases. Also, many of the underlying authorizations were obtained by, and assigned or transferred between, certain of Qwest's predecessors-in-interest many years ago, before the 2000 merger of Qwest and U S WEST. Nevertheless, we've been able to determine as follows:

- 1 ITC-T/C-19980406-00232 (ITC-98-271-TC) – It appears that all of the authorizations included in this earlier transaction that Qwest wishes to surrender were already listed in your email below, so no further action is required with respect to this particular file.
- 1 ITC-ASG-19960328-00122 (ITC-96-204-AL) – The underlying authorization for this earlier transaction is old file ITC-92-096 (international resale service) and should be surrendered as well. A copy of the relevant PN is attached for your convenience.
- 1 ITC-T/C-19960328-00123 (ITC-96-203-TC) – It appears that all of the underlying authorizations that were covered by this T/C application – File Nos. ITC-95-189, ITC-95-541, ITC-95-114, ITC-95-109, and ITC-95-185, were transferred from one of Qwest's predecessors-in-interest to Trescom International in 1997 (DA 97-233), and then to Primus in 1998 (see DA 98-956). So, these underlying authorizations have not been held by the Qwest family of companies since 1997, and accordingly should not be included in either the surrender letter or deemed subject to the recently-filed Qwest-CenturyLink applications.
- 1 Charter and Litel authorizations – Authorizations ITC-93-001 and ITC-92-184 should both be surrendered.
- 1 Afford-a-Call Corp – The authorization for Afford-a-Call Corp is ITC-91-047, published at 6 FCC Rcd. 1747 (1991). It also appears that Afford-a-Call held additional switched resale authorizations, File Nos. ITC-88-061 and ITC-88-063 (published at 3 FCC Rcd. 1619 (1988)). (Let me know if you still need copies of those authorizations now that you have the FCC record cites.) These would have been assigned to one of Qwest's predecessors-in-interest several years ago, and to the extent these are still in existence, they should be surrendered as well.
- 1 ITC-T/C-19971002-00598 – Correct, old authorization ITC-89-092 (new file no. ITC-214-19890407-00001 for switched resale service) should be surrendered.

Let us know if you need additional information to complete processing of this request.

Rob

From: JoAnn Sutton [mailto:JoAnn.Sutton@fcc.gov]
Sent: Monday, May 17, 2010 6:43 PM
To: Morse, Robert
Cc: Sumita Mukhoty; David Krech; JoAnn Sutton
Subject: FW: Qwest International Section 214 Authorization Surrender and Related Database "Cleanup" Issues

6/15/2010

Rob,

Below are the 214 Authorizations you requested we surrender:

ITC-91-084 (ITC-214-19910415-00016)
ITC-214-19960226-00087 (ITC-96-149)
ITC-214-19931203-00224 (ITC-94-064)
ITC-94-527 (ITC-214-19940930-00302)
ITC-93-336 (ITC-214-19930915-00175)
ITC-86-154 (ITC-214-19860730-00001)
ITC-214-19890407-00006 (ITC-89-092)
ITC-214-19970804-00454 (ITC-97-448)
ITC-214-19970804-00464 (ITC-97-447)
ITC-214-19991028-00681

You also requested that we surrender T/Cs and ASGs, which we cannot do; we must surrender the 214 authorization associated with the T/C or ASG. Therefore, can you please provide me with the file number (either old or new number) of the 214 authorization/s you wish to surrender for the following transactions:

ITC-T/C-19980406-00232 (ITC-98-271-TC)
ITC-ASG-19960328-00122 (ITC-96-204-AL)
ITC-T/C-19960328-00123 (ITC-96-203-TC)

ITC-93-001 – this file number seems to be Charter Network Co.'s 214 authorization that was included under T/C application I-T-C-93-107-TC. Also, ITC-92-184 appears to be Litel Telecommunications Corporation's 214 authorization that was transferred under ITC-93-107-TC; please confirm that these two 214 authorizations are the ones you wish to surrender. I cannot locate a 214 for Afford-a-Call Corp; can you please provide it.

Also, please confirm that for ITC-T/C-19971002-00598, you wish to surrender 214 authorization ITC-89-092 (ITC-214-19890407-00001).

Feel free to call me at (202) 418-1372 if you have any questions.

Thanks!

JoAnn

6/15/2010

From: Sumita Mukhoty
Sent: Tuesday, May 04, 2010 11:27 AM
To: JoAnn Sutton; Adrienne Downs
Cc: David Krech
Subject: FW: Qwest International Section 214 Authorization Surrender and Related Database "Cleanup" Issues

JoAnn – Here are the surrenders that we had discussed briefly a week or so ago. Let me know if you want to discuss this once you've had a chance to review the filings, etc. Thanks. Sumita

From: Morse, Robert [mailto:RMorse@wbklaw.com]
Sent: Monday, May 03, 2010 5:19 PM
To: Sumita Mukhoty
Cc: David Krech
Subject: Qwest International Section 214 Authorization Surrender and Related Database "Cleanup" Issues

Sumita –

Per our discussion of a few days ago, attached please find a receive-stamped copy of the letter filed last Friday on behalf of Qwest Communications International Inc. surrendering a number of its wholly-owned subsidiaries' redundant or unused international section 214 authorizations.

As you have probably gathered, this effort is being undertaken in conjunction with the preparation of applications related to the recently-announced Qwest-CenturyLink transaction. In that regard, a few of the Qwest Communications Company, LLC ("QCC") authorizations that will be retained and will be subject to those applications still have the old ITC file numbers, as follows: ITC-95-590; ITC-94-380; and ITC-90-028 (copies of the accompanying Orders granting those authorizations are attached for your convenience). We'll need to obtain updated file numbers in order to process those applications via IBFS.

In addition, most of the QCC authorizations appear to have outdated or no information in IBFS. In a pro forma assignment notification application filed at the beginning of 2009, which involved the assignment of a number of authorizations from Qwest Communications Corporation (QCC's successor entity) to QCC (File No. ITC-ASG-20090130-00041 – copy attached for your convenience), QCC listed all of the subject QCC authorizations, including the ones being retained for purposes of the CenturyLink transaction. Those authorizations were also part of the original Qwest-US WEST merger several years ago and a subsequent pro forma reorganization that rolled them into Qwest Communications Corporation. Let me know if you need any additional information in order to make the necessary administrative updates in IBFS.

Thanks again and please let me know if you have questions or need additional information.

Rob

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6/15/2010

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