

9 April 2014

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BY ELECTRONIC FILING

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Level 3 Communications, LLC, Notification of Provision of International Telecommunications Services Through a Wholly-Owned Subsidiary,

FCC File No. FCC File No. ITC-214-19971229-00821

Dear Ms. Dortch:

Re:

Pursuant to 47 C.F.R. § 63.21(h), Level 3 Communications, LLC ("Level 3 LLC"), notifies the Commission that it will provide service through its wholly-owned subsidiary, Level 3 Latin American Solutions, LLC ("Level 3 LAS"). Level 3 LAS is a Delaware limited-liability company that provides resold international telecommunications services between the United States and Latin American destinations and competes against incumbent carriers in those markets. Level 3 LLC owns, and has always owned, 100 percent of Level 3 LAS's member interests. The Commission has previously authorized Level 3 LLC to provide global facilities-based and global resale services pursuant to FCC File No. ITC-214-19971229-00821 (old FCC File No. ITC-98-016).

Level 3 LAS commenced provision of U.S. international telecommunications services in May 2012, believing that it had received international Section 214 authority. Level 3 LLC has been unable to confirm that the notification required pursuant to 47 C.F.R. § 63.21(h) was made previously and therefore makes this notification out of an abundance of caution.

Unlike a scenario in which a carrier provides international telecommunications services absent Commission authorization, here Level 3 LAS has been authorized to operate pursuant to 47 C.F.R. § 63.21(h) since it commenced service. At most, Level 3 LLC neglected to confirm that authority by filing the requisite notification. Moreover, Level 3 LLC has at all times complied with Commission reporting, contribution obligations, and other regulatory requirements on the assumption that Level 3 LAS was authorized to operate pursuant to 47 C.F.R. § 63.21(h). Level 3 LLC—which files FCC Forms 499-A and 499-Q with the Universal Service Administrative Company on a consolidated basis for itself and its subsidiaries—fully reported Level 3 LAS revenues and paid applicable USF contributions on Level 3 LAS's end-

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user revenues, paid the applicable contributions for the TRS Fund and NANP administration, and paid applicable annual regulatory fees assessed on interstate telecommunications providers (which the FCC assesses on U.S. international revenues as well as domestic interstate revenues). Level 3 LLC also reported Level 3 LAS's revenue, and traffic information pursuant to 47 C.F.R. §§ 43.61 and 43.82. With respect to Level 3 LAS, Level 3 LLC believes that it has otherwise complied with the Commission's other requirements for facilities-based and resale carriers, as set forth in 47 C.F.R. §§ 63.21 and 63.23. Level 3 LLC regrets any oversight with respect to the notification and maintains that the public interest was not harmed by any paperwork oversight pertaining to 47 C.F.R. § 63.21(h) requirements.

Should you have any questions regarding this notification, please contact me by telephone at +1 202 730 1337 or by e-mail at kbressie@wiltshiregrannis.com.

Yours sincerely,

Lutt For

Kent Bressie

Counsel for Level 3 Communications, LLC, and Level 3 Latin American Solutions, LLC