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March 19, 2004

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Ms. Rebecca Halstead
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Incorrect Information In International Section 214 Public Notice DA No. 04-737
(released March 18, 2004)
ITC-214-19990708-00391, ITC-98-342/ITC-98-342A

Dear Rebecca:

As we discussed this afternoon, the Public Notice referenced above incorrectly lists the surrender of certain international authorizations. Specifically, the Public Notice states that Level 3 Communications, LLC ("Level 3") surrendered international Section 214 authorization ITC-214-19990708-00391, as well as international authorizations ITC-98-342 and ITC-98-342A, by a letter dated March 5, 2004. As further explained below, Level 3 did not surrender these authorizations. Rather, GLT Liquidating Trust ("GLT Trust"), the successor-in-interest to Genuity Telecom Inc., Debtor-in-Possession ("Genuity"), surrendered Genuity's *residual authority* that it had retained under authorization ITC-214-19990708-00391 and surrendered the ITC-98-342 and ITC-98-342A authorizations.

On March 5, 2004, counsel to GLT Trust submitted a letter to the Commission surrendering certain international authorizations previously held by Genuity, a copy of which is attached. As explained in that letter, Genuity assigned out of bankruptcy substantially all of its assets and customers to Level 3, including the international Section 214 authorization ITC-214-19990708-00391. The letter also explained that even though it was assigned to Level 3, Genuity retained *residual authority* under that same authorization in the event that any of Genuity's international common carrier customers were not transferred to Level 3.¹ GLT Trust surrendered

¹ Genuity Telecom Inc. and Level 3 Communications, LLC Joint Application to Assign Telecommunications Carrier Assets and International Section 214 Authority for Provision of Global Facilities-Based and Global Resale Services, and to Transfer Control of Domestic Common Carrier

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only its residual authority that it retained under this Section 214 authorization. It did not, and in fact has no authority to, surrender the authorization that is currently held by Level 3. The Public Notice thus incorrectly reports that Level 3 surrendered the ITC-214-19990708-00391 authorization.

The March 5 letter also surrendered international authorizations ITC-98-342 and ITC-98-342A, which authorizes the operation of certain cable capacity on the Americas-II undersea cable, on behalf of GLT Trust. The Public Notice inaccurately references these authorizations as also being surrendered by Level 3. These authorizations were never assigned to Level 3, and until they were surrendered on March 5, were held by Genuity.²

Accordingly, GLT Trust requests that the Commission amend its records and the Public Notice to reflect that Genuity surrendered its residual authority under the ITC-214-19990708-00391 authorization (not that Level 3 surrendered this authorization altogether) and that Genuity (not Level 3) surrendered the ITC-98-342 and ITC-98-342A authorizations. If you have any questions concerning this matter, please contact the undersigned as soon as possible. Thank you for your assistance.

Very truly yours,



Jennifer L. Kostyu
Counsel to GLT Liquidating Trust

Transmission Lines Pursuant to Section 214 of the Communications Act of 1934, as Amended; ITC-214-19990708-00391, ITC-ASG-20021216-00592 (granted Jan. 22, 2003); WC Docket No. 02-385 (granted Jan. 20, 2003); Letter from Kent D. Bressie, Counsel, Level 3 Communications, LLC, to Marlene H. Dortch, Secretary, FCC, File No. ITC-ASG-20021216-00592 and ITC-214-19990708-00391 (Mar. 19, 2003) (notifying the Commission that the assignment of Genuity's international Section 214 authorization was consummated on February 4, 2003).

² A notification letter was filed on January 25, 2002, to change the name on these authorizations from GTE Telecom Incorporated to Genuity Telecom Inc. The FCC issued a public notice on February 7, 2002, acknowledging receipt of this name change notification. The FCC's international licensing database (IBFS), however, was never changed to reflect the new name.