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**JUL 14 2008**

Federal Communications Commission  
Office of the Secretary

14 July 2008

**BY HAND DELIVERY**

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

Re: *Surrender of International Section 214 Authorizations and Notification of  
Provision of International Telecommunications Services Through Wholly-Owned  
Subsidiaries of Level 3 Communications, LLC*

Dear Ms. Dortch:

Pursuant to Section 63.21(f) of the Commission's rules, six wholly-owned subsidiaries of Level 3 Communications, LLC ("Level 3") surrender their international Section 214 authorizations and notify the Commission of their reliance on the international Section 214 authorization of their parent company.

Between 2005 and 2007, Level 3 and its direct and indirect parent companies consummated a number of corporate acquisitions resulting in its ownership of a variety of entities holding international Section 214 authorizations. These authorizations are duplicative of the global facilities-based and global resale authority in the international Section 214 authorization held by Level 3.

To reduce the administrative burden associated with its Commission authorizations, these six subsidiaries are surrendering their international Section 214 authorizations, as detailed in Table 1 below. Instead, they will provide international telecommunications services in reliance on the international Section 214 authorization of Level 3, FCC File No. ITC-214-19971229-

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00821 (Old FCC File No. ITC-98-016).<sup>1</sup> Consistent with the requirements of Section 63.21(h) of the Commission's rules, these six subsidiaries are entitled to rely on the international Section 214 authorization of Level 3. Neither Level 3 nor any of these six subsidiaries is regulated as dominant for a particular route. Each of the six subsidiaries will commence service in reliance on Level 3's international Section 214 authorization as of the date of this surrender notice.

**Table 1**

<b>Subsidiary</b>	<b>Place of Organization</b>	<b>Original File Number</b>	<b>File Number Associated with Transfer of Control to Level 3</b>
Broadwing Communications, LLC	Delaware	ITC-214-20030313-00134	ITC-T/C-20061017-00475
Eldorado Acquisition Three, LLC, fka TelCove, Inc.	Delaware	ITC-214-19971128-00747	ITC-ASG-20060609-00313
ICG Telecom Group, Inc.	Delaware	ITC-214-19980508-00305	ITC-T/C-20060417-00237
Looking Glass Networks Holding Company, Inc.	Delaware	ITC-214-20000612-00357	ITC-T/C-20060615-00319
Vvvx, LLC	Delaware	ITC-214-20050907-00365	ITC-T/C-20051102-00461
WitTel Communications, LLC	Delaware	ITC-214-19970115-00025	ITC-T/C-20051102-00460

These six subsidiaries will continue to provide the same services before and after these relinquishments and commencement of service in reliance on Level 3's international Section 214 authorization. At no time will any of these subsidiaries provide international telecommunications services without Commission authority—whether issued in the name of each subsidiary pre-surrender and in reliance on Level 3's authorization post-relinquishment.

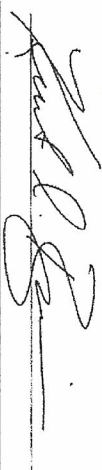
<sup>1</sup> An affiliate of Level 3, Level 3 International, Inc., will continue to provide international telecommunications services in reliance on its own international Section 214 authorization, FCC File No. ITC-214-19981214-00867. Level 3 International, Inc., is *not* surrendering this authorization.

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Should you have any questions regarding this notification, please contact me by telephone at +1 202 730 1337 or by e-mail at [kbressie@harriswiltshire.com](mailto:kbressie@harriswiltshire.com).

Respectfully submitted,



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cc: James Ball (IB)  
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