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MAR 18 2002  
Telecom Division  
International Bureau

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February 27, 2002

**BY HAND DELIVERY**

William F. Caton  
Secretary

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Federal Communications Commission  
236 Massachusetts Avenue, N.E., Suite 110  
Washington, D.C. 20002

FEB 27 2002  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Attn: Claudia Fox, Chief  
Policy and Facilities Branch  
Telecommunications Division  
International Bureau

Re: Notification of the Pro Forma Transfer of Control of International Section  
214 Authorizations Held by CCPR

Dear Mr. Caton:

Pursuant to a request of the staff, Cingular Wireless LLC ("Cingular") hereby notifies the Commission of the pro forma transfer of control of the following international Section 214 authorizations from Cingular to Cingular:

CCPR Services, Inc., Authorization Number ITC-94-100;  
CCPR of the Virgin Islands, Inc., Authorization Number ITC-214-20001101 -  
00664; and  
USVI Cellular Telephone Corporation, Authorization Number ITC-93-128.

These authorization holders are subsidiaries of SBC International Puerto Rico, Inc. ("SBCI - PR"). SBCI - PR and its subsidiaries are known collectively as the "CCPR Companies."<sup>1</sup> Cingular indirectly holds a 50 percent controlling interest in SBCI - PR and, thus, in each of the CCPR Companies. This transaction does not affect Cingular's 50 percent controlling interest; instead, it concerns the other 50 percent noncontrolling interest in the CCPR Companies.

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<sup>1</sup> In addition to the authorization holders, the CCPR Companies include two other Commission licensees, San Juan Cellular Telephone Company and CCPR Paging, Inc.

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On January 28, 2002, SBC International, Inc., a wholly owned subsidiary of SBC Communications Inc. (“SBC”) acquired SubDipsa LLC (“SubDipsa”) from América Móvil, S.A. de C.V. (“América Móvil”).<sup>2</sup> SubDipsa holds a 50 percent noncontrolling interest in SBCI – PR and the other CCPR Companies. This transaction resulted in a pro forma transfer of control of the CCPR Companies.<sup>3</sup>

In summary, Cingular, which is the CMRS joint venture between SBC and BellSouth Corporation (“BellSouth”), continues to hold the 50 percent controlling interest in the CCPR Companies. Now, SBC indirectly holds the 50 percent noncontrolling interest in the CCPR Companies.

This transaction also resulted in the deaffiliation of each of the CCPR Companies from Telefonos de México, S.A. de C.V. (“Telmex”), a foreign carrier which indirectly had held the noncontrolling interest in SBCI – PR from late 1999 until América Móvil was spun off from Telmex.<sup>4</sup> Subsequent to Telmex’s acquisition of the interest in SBCI – PR, it obtained control of other foreign carriers.<sup>5</sup> Through Telmex and América Móvil, these foreign carriers also were affiliates of the CCPR Companies pursuant to Section 63.09(e) of the Commission’s rules.<sup>6</sup> However, by removing América Móvil from the

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<sup>2</sup> Subsequent to this transaction, SubDipsa was renamed SBC CCPR Holdings, LLC.

<sup>3</sup> See *Wireless Telecomm. Bureau and Int’l Bureau Complete Review of Proposed Investment by Telefonos de México, S.A. de C.V. in Parent of Cellular Communications of P.R.*, Public Notice, 15 FCC Rcd. 1227 (WTB/IB 1999) (“*Telmex Interest PN*”) (holding that a transfer of the noncontrolling 50 percent interest in the CCPR Companies is a pro forma transfer of control).

<sup>4</sup> Despite this spin-off, the CCPR Companies remained affiliated with Telmex because Telmex and América Móvil were under common control.

<sup>5</sup> Telmex International, Inc. has reported to the Commission its affiliations with Telecomunicaciones de Guatemala, S.A. and Techtel-LMDS Comunicaciones Interactivas, S.A.

<sup>6</sup> 47 C.F.R. § 63.09(e). Telmex and América Móvil are not controlled by either SBC or Cingular, and the regulatory personnel and outside FCC counsel of the CCPR Companies, Cingular, and SBC only recently learned of these affiliations. As a result, these two foreign carrier affiliations never were reported for the CCPR Companies. Through this transaction, these affiliations (and any others that may exist) have been terminated, which moots the reporting issue. Moreover, the CCPR Companies are

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ownership of the CCPR Companies, this transaction ended all such affiliations for the CCPR Companies.<sup>7</sup>

A duplicate copy of this letter is being filed with the original. Please feel free to contact me at 202-942-5634 if you have any questions regarding this filing.

Sincerely,



Peter J. Schildkraut  
Counsel for Cingular Wireless LLC, SBC  
Communications Inc.; CCPR Services,  
Inc.; CCPR of the Virgin Islands, Inc.; and  
USVI Cellular Telephone Corporation

cc: George Li

Susan O'Connell, Esq.

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switched resellers of other carriers' international services, which makes it highly unlikely that the CCPR Companies could engage in discriminatory or other predatory pricing practices. See *In re 2000 Biennial Regulatory Review: Policy & Rules Concerning the Int'l, Interexchange Marketplace*, Report and Order, 16 FCC Rcd. 10647 ¶ 62 (2001); *In re Rules & Policies on Foreign Participation in the U.S. Telecomm. Mkt.*, Report and Order and Order on Reconsideration, 12 FCC Rcd. 23891 ¶¶ 198-206 (1997), *recon.* denied *in relevant part*, Order on Reconsideration, 15 FCC Rcd. 18158 ¶¶ 68-69 (2000).

<sup>7</sup> Of course, this transaction did not affect the CCPR Companies' foreign carrier affiliations through SBC and BellSouth, of which the Commission previously has been notified.