

**Telecom Italia Sparkle of North America, Inc. (TISNA)
Request to Provide Services to Cuba**

Attachment 1

Response to Question 11: Foreign Carrier Affiliations (Section 63.18(i) through (m))

63.18(i): TISNA certifies that it is not a foreign carrier, as defined by Section 63.09 of the Commission’s rules, 47 C.F.R. § 63.09. However, TISNA certifies that it is affiliated with foreign carriers in the countries listed in the table below.

Country	Country
Argentina	Luxembourg
Austria	The Netherlands
Belgium	Panama
Bolivia	Paraguay
Brazil	Peru
Bulgaria	Romania
Chile	San Marino
Colombia	Singapore
Czech Republic	Slovak Republic
France	Spain
Germany	Switzerland
Greece	Turkey
Hungary	United Kingdom
Ireland	Uruguay
Israel	Venezuela
Italy	

63.18(j): TISNA certifies that in this application it is not seeking to provide international telecommunications services to a destination country in which it has an affiliation with a foreign carrier as described in Section 63.18(j) of the Commission’s rules.

63.18(k): Not applicable because TISNA is not affiliated with any carriers in Cuba.

63.18(l): Not applicable because TISNA is not affiliated with any carriers in Cuba.

63.18(m): Not applicable because in this application TISNA is not seeking authority in this application to provide services to any of the countries listed in response to 63.18(i) above.

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Attachment 2

Response to Question 14 (Section 63.18(h)):

Name, address, citizenship and principal businesses of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest one percent). Identify any interlocking directorates with a foreign carrier.

TISNA's ten percent (10%) or greater direct or indirect shareholders:

Name/Address	% Held	Citizenship	Principal Business
Telecom Italia Sparkle S.p.A. Via Cristoforo Colombo 142 00147 Rome Italy	100%	Italy	Telecommunications

The following entity holds a ten percent (10%) or greater ownership interest in Telecom Italia Sparkle S.p.A

Name/Address	% Held	Citizenship	Principal Business
Telecom Italia S.p.A. Piazza degli Affari, 2 20123 Milan Italy	100%	Italy	Telecommunications

The following entities hold a ten percent (10%) or greater ownership interest in Telecom Italia S.p.A.:

Name/Address	% Held	Citizenship	Principal Business
Telco S.p.A. Galleria del Corso 2 20122 Milan Italy	22.4%	Italy	Holding Company which through its subsidiaries provides telecommunications services

The following entities hold a ten percent (10%) or greater ownership interest in Telco S.p.A:

Name/Address	% Held	Citizenship	Principal Business
Generali Group Piazza Duca degli Abruzzi 2 Trieste Italy	30.58%	Italy	Insurance and Financial and Asset Management
Mediobanca S.p.A. Piazzetta Enrico Cuccia 1 20121 Milan Italy	11.62%	Italy	Investment bank
Intesa Sanpaolo S.p.A. Piazza San Carlo, 156 10121 Torino Italy	11.62%	Italy	Investment bank
Telefónica S.A. Distrito C – Edificio Central Pl 2a 28050 Madrid Spain	46.18%	Spain	Telecommunications

No other shareholder of Telco S.p.A. will hold a 10% or greater indirect interest in TISNA.

Interlocking Directorates

The following officers or directors of TISNA are also officers or directors on the boards of the following foreign companies which are engaged in the provision of telecommunications services.

Name of Officer/Director	Company	Position
Paolo Ferrari	LAN MED Nautilus Limited	President of Board of Directors
Paolo Ferrari	MED 1 Italy Srl	President of Board of Directors
Paolo Ferrari	Telecom Italia (Netherlands) B.V.	Director
Paolo Ferrari	Mediterranean Nautilus Israel Ltd	President of Board of Directors
Paolo Ferrari	Telecom Italia S.p.A.	CEO
Paolo Ferrari	Telecom Italia Sparkle of North America, Inc.	President of Board of Directors

Name of Officer/Director	Company	Position
Paolo Ferrari	Telecom Italia Sparkle Singapore PTE Ltd	President of Board of Directors
Valerio Cavallo	LAN MED Nautilus Limited	Director
Valerio Cavallo	Telecom Italia S.p.A.	President of Board of Directors
Valerio Cavallo	Telecom Italia Sparkle of North America, Inc.	Director
Valerio Cavallo	Telecom Argentina S.A.	Deputy Director

Response to Question 15 (Section 63.18(d), (e)(3), and (g))

63.18(d): TISNA has authority under Section 214 of the Act to provide global facilities-based and resale services between and United States and all international points except Cuba (on a facilities-bases), San Marino, and Serbia and Montenegro. See ITC-214-20000523-00313.

TISNA has authority under Section 214 of the Act to provide global facilities-based and resale services between the United States and Serbia and Montenegro. See ITC-214-20030716-00357.

63.18(e)(3): TISNA requests Section 214 authority to operate as a facilities-based and resale carrier to Cuba pursuant to Section 63.18(e)(3) of the Commission’s rules.

TISNA initially intends to provide fixed and mobile termination services to Cuba. To provide such services, TISNA will utilize interconnections with facilities-based third party carriers. TISNA anticipates that termination could occur either through bearer circuits currently in place (e.g., Telespazio satellites, IDR 335 and 325) or fiber optic submarine cable transmission facilities. No construction of new facilities is planned. In the future, if agreements can be made with ETECSA that comply with the FCC’s International Settlements Policy and Benchmark Rates, or that could be the subject of a reasonable request for waiver of one or both policies, TISNA will consider initiating the provision of services directly to Cuba as authorized by the grant of this application under section 63.22(d). At this time, TISNA will terminate international voice and data traffic via third parties only.

TISNA certifies that it will comply with the terms and conditions of Sections 63.21, 63.22 and 63.23 of the Commission’s rules, 47 C.F.R. §§ 63.21, 63.22, and 63.23, as applicable.

No agreement with ETECSA or any other Cuban entity will involve any investment by TISNA or any of its affiliated companies in Cuba’s domestic infrastructure. TISNA intends only to acquire such services as are needed from Cuban entities so as to provide service between the United States and Cuba under this Section 214

authorization. TISNA will seek, as needed for the payment for such services, appropriate licenses from the Office of Foreign Assets Control of the Treasury Department, or the Bureau of Industry and Security of the Department of Commerce.

63.18(g): The authorization of facilities that is the object of this application is categorically excluded as defined by Section 1.1306, 47 C.F.R. § 1.1306, and no environmental assessment as defined by Section 1.1311, 47 C.F.R. § 1.1311, need be filed with this application.