

Attachment 1

Response to Question 8: Description of Authorization Requested

Wireless Maritime Services, LLC (“WMS”), a joint venture of AT&T and Maritime Telecommunications Network, Inc. (“MTN”), operates wireless systems on board cruise ships of many different cruise lines. WMS seeks authorization under Section 214 of the Communications Act of 1934, as amended, to provide international facilities-based and resold services to all international points except countries on the FCC’s Exclusion List.

Response to Question 9: Request for Streamlined Processing (Section 63.12)

This application qualifies for streamlined processing pursuant to Section 63.12(c).¹ WMS is not a foreign carrier. Although WMS is affiliated with foreign carriers in destination markets as described in response to Question 11 below, WMS qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission’s rules because the affiliates in these countries have no market power on the foreign end of any of these routes.² All of WMS’ foreign carrier affiliates have market shares under 50 percent in the international transport and local access markets on the foreign end of U.S. routes to these countries. None of these entities is listed on the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.³ Therefore, WMS is presumptively classified as non-dominant on these routes.

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

Section 63.18(i)

WMS certifies that it is not a foreign carrier, as that term is defined by Section 63.09 of the Commission’s rules, 47 C.F.R. § 63.09. In addition, WMS is not affiliated with any foreign carriers through its ownership by Maritime Telecommunications Network, Inc. (“MTN”).

WMS certifies that, through its ownership by AT&T, it is affiliated with the following foreign carriers:

AT&T Communications Services Argentina S.R.L.		Argentina
AT&T Global Network Services Australia Pty. Ltd.		Australia

¹ 47 C.F.R. § 63.12.

² See 47 C.F.R. §§ 63.10(a)(3).

³ *The International Bureau Revises and Reissues the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, DA 07-233 (Jan. 26, 2007).

AT&T Global Network Services Austria GmbH		Austria
AT&T Global Network Services Belgium Luxembourg S.P.R.L.		Belgium
AT&T Global Network Services Brazil Ltda.		Brazil
AT&T Global Network Services Bulgaria Ltd.		Bulgaria
AT&T Global Services Canada Co.		Canada
AT&T Enterprises Canada Co.		Canada
BellSouth Long Distance, Inc.		Canada
AT&T Chile SA		Chile
AT&T Red Global Telecommunications Ltda.		Chile
AT&T Global Network Services Colombia (Ltda.)		Colombia
AT&T Global Network Services Hrvatska d.o.o.		Croatia
AT&T Global Network Services Czech Republic s.r.o.		Czech Republic
AT&T Global Network Services Ltd.		Cyprus
AT&T Global Network Services Danmark ApS		Denmark
AT&T Global Network Services Ecuador Cia. Ltda.		Ecuador
AT&T Global Network Services Estonia Ou		Estonia
AT&T Global Network Services Finland Oy		Finland
AT&T Global Network Services France SAS		France
AT&T Global Network Services Deutschland GmbH		Germany
AT&T Global Network Services (Hellas) E.P.E. (Limited)		Greece
AT&T Servicios de Comunicaciones de Guatemala SA		Guatemala
AT&T Global Network Services Hong Kong Limited		Hong Kong
AT&T Global Network Services Hungary Kft		Hungary
AT&T Global Network Services Private Limited		India
AT&T Global Network Services Ireland Limited		Ireland
AT&T Global Network Services Private Limited		Indonesia
AT&T Global Network Services International Inc.		Israel
AT&T Global Network Services Italia S.p.A.		Italy
AT&T Japan Ltd.		Japan
AT&T Japan KK		Japan
AT&T Communications Services (Japan) Ltd.		Japan
AT&T Japan LLC		Japan
AT&T GNS Korea Limited (Yuhan Hoesa)		Korea
AT&T Global Network Services Latvia SIA		Latvia
UAB AT&T Lietuva (Lithuania)		Lithuania
AT&T Global Network Services Belgium Luxembourg S.P.R.L. (Branch Office)		Luxembourg
AT&T Worldwide Network Services (Malaysia) Sdn. Bhd.		Malaysia
AT&T Global Network Services Mexico S. de R.L. de C.V.		Mexico
AT&T Global Network Services Morocco sarl au		Morocco
AT&T Global Network Services Nederland B.V.		Netherlands

AT&T Global Network Services International Inc.		New Zealand
AT&T Global Network Services Norge LLC		Norway
AT&T Global Network Services International Inc.		Pakistan
AT&T Communications Services de Panama S. de R.L.		Panama
AT&T Global Network Services del Peru S.R.L.		Peru
AT&T Global Network Services Polska Sp. z.o.o.		Poland
AT&T Serviços de Telecomunicações, Sociedade Unipessoal, Lda.		Portugal
AT&T Global Network Services Romania S.R.L.		Romania
AT&T Global Network Services OOO		Russia
AT&T Worldwide Telecommunications Services Singapore Pte Ltd.		Singapore
AT&T Global Network Services Slovakia s.r.o.		Slovakia
AT&T Globalne Omrezne Storitve d.o.o.		Slovenia
AT&T South Africa (Proprietary) Limited		South Africa
AT&T Global Network Services Espana, S.L.		Spain
AT&T Global Network Services Sweden AB		Sweden
AT&T Global Network Services Switzerland GmbH		Switzerland
AT&T Global Network Services Taiwan Ltd.		Taiwan
AT&T Worldwide Services (Thailand) Limited		Thailand
AT&T Global İletişim Servisleri Limited Şirketi Ltd. STİ		Turkey
AT&T Global Network Services (UK) B.V.		United Kingdom
AT&T Global Network Services Venezuela LLC		Venezuela

Section 63.18(j)

WMS certifies that it does not request authority to provide international telecommunications services to any destination country in which WMS is a foreign carrier or controls a foreign carrier.

WMS certifies that it requests authority to provide international telecommunications services to all of the destination markets identified above in which AT&T has a controlling interest in foreign carrier.

Section 63.18(k)

In accordance with Section 63.18(k)(1) of the Commission's rules, 47 C.F.R. § 63.18(k)(1), WMS certifies that all of the countries listed above are WTO Member countries, with the exception of Russia.⁴ WMS certifies that its foreign carrier affiliate in Russia, AT&T Global Network Services, owns no facilities in that destination market,

⁴ See WTO Members and Observers List, at http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (last visited Apr. 12, 2011).

and therefore, lacks market power in Russia, satisfying the requirement of Section 63.18(k)(2).

Section 63.18(l), (m)

WMS seeks non-dominant classification on all routes in which AT&T controls a foreign carrier. As described in response to Question 9 above, WMS qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules because the affiliates in these countries have no market power on the foreign end of any of these routes.⁵ All of WMS' foreign carrier affiliates have market shares under 50 percent in the international transport and local access markets on the foreign end of U.S. routes to these countries. None of these entities is listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.⁶

Response to Question 12: Service to Foreign Countries

WMS requests authority to provide service to all of the destination countries listed in response to Question 11 in which AT&T controls a foreign carrier.

⁵ See 47 C.F.R. §§ 63.10(a)(3).

⁶ See *supra* note 3.

Attachment 2

Response to Question 14: Ownership Information and Interlocking Directorates

Ownership Information

Direct Ownership

The following entities hold a direct ten percent or greater interest in WMS:

New Cingular Wireless Services, Inc.
5601 Legacy Drive, MS: A-3
Plano, TX 75024
Citizenship: Delaware
Principal Business: Provision of CMRS Services
Percentage Direct Equity and Voting Interest: 51%

Maritime Telecommunications Network, Inc. (MTN)
3044 N. Commerce Parkway
Miramar, FL 33025
Citizenship: Colorado
Principal Business: Provision of C-band and Ku-band VSAT services
Percentage Direct Equity and Voting Interest: 49%

New Cingular Wireless Services, Inc. Ownership

The following entities hold an indirect ten percent or greater interest in WMS through direct or indirect interests in New Cingular Wireless Services, Inc.:⁷

AT&T Teleholdings, Inc.
208 S. Akard Street
Dallas, TX 75202
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of SBC Telecom, Inc.

BellSouth Mobile Data, Inc.
675 W. Peachtree St. NW
Room 4319
Atlanta, GA 30375

⁷ The ownership interests provided herein are the actual direct ownership interests held in the next disclosed subsidiary in the vertical ownership chain rounded to the nearest one percent.

Citizenship: Georgia
Principal Business: Holding Company
Direct Ownership Interest: 40% of AT&T NCWS Holdings Inc.

AT&T NCWS Holdings Inc.
1025 Lenox Park Blvd. NE
Atlanta, GA 30319
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of New Cingular Wireless Services, Inc.

SBC Telecom, Inc.
208 S. Akard Street
Dallas, TX 75202
Citizenship: Delaware
Direct Principal Business: Holding Company
Direct Ownership Interest: 60% of AT&T NCWS Holdings Inc.

AT&T Inc.
208 S. Akard Street
Dallas, TX 75202
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of AT&T Teleholdings, Inc. and 100% of BellSouth Mobile Data, Inc.

AT&T is a publicly traded corporation whose stock is widely held by the public with no person or entity holding a ten percent or greater ownership interest in AT&T.

Maritime Telecommunications Network, Inc. Ownership

The following entities hold an indirect ten percent or greater interest in WMS through direct or indirect interests in MTN:⁸

MTN Acquisition Corp. (MTNAC)
3044 N. Commerce Parkway
Miramar, FL 33025
Citizenship: Delaware
Principal Business: Holding Company
Indirect Ownership of WMS: 100% of MTN

MariTel Holdings, Inc. (MariTel)
3044 N. Commerce Parkway
Miramar, FL 33025

⁸ *Id.*

Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of MTNAC

SeaMobile Satellite Holdings, Inc. (SSH)
719 2nd Ave.
Suite 820
Seattle, WA 98104
Citizenship: Washington corporation
Principal Business: Holding Company
Direct Ownership Interest: 100% of MariTel

SeaMobile, Inc. (SeaMobile)
719 2nd Ave.
Suite 820
Seattle, WA 98104
Citizenship: Washington corporation
Principal Business: Holding Company
Direct Ownership Interest: 100% of SSH

Ignition Venture Partners III, L.P. (IVP III)⁹
11400 SE 6th Street
Suite 100
Bellevue, WA 98004
Citizenship: Delaware limited partnership
Principal Business: Investment Fund
Direct Ownership Interest: 26.7% of SeaMobile

Interlocking Directorates

WMS and MTN do not have any interlocking directorates.

AT&T has the following interlocking directorates: Rayford Wilkins, Jr. retired from his position as Chief Executive Officer - AT&T Diversified Businesses of AT&T Inc. effective March 30, 2012. However, at this time, Mr. Wilkins remains on the América Móvil, S.A.B. de C.V. (“América Móvil”) board of directors.¹⁰ Consequently, Applicant hereby discloses Mr. Wilkins as an interlocking directorate with América Móvil. AT&T expects that, in the coming weeks, it will nominate a new director for election to the

⁹ IVP III is managed by Ignition GP III, LLC, a Washington limited liability company.

¹⁰ Under the terms of a shareholder agreement between an affiliate of AT&T and a trust holding shares for the benefit of members of the Slim family, the trust and AT&T have agreed to vote its shares in favor of eight members nominated by the trust to the board of directors of América Móvil and two members nominated by AT&T. *See* América Móvil, S.A.B. de C.V., General Statement of Acquisition of Beneficial Ownership (Form 13D) at 18 (Jul. 15, 2011).

board at the next meeting of América Móvil's shareholders. América Móvil is a carrier or controls carriers in Argentina, Brazil, Chile, Colombia, Costa Rica, the Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, México, Nicaragua, Panama, Paraguay, Peru, the United States, and Uruguay.¹¹

Michael J. Viola, Senior Vice President - Finance of AT&T Inc., is a director of both Teléfonos de México, S.A.B. de C.V. ("Telmex") and América Móvil. Michael Bowling, President - Mexico of AT&T Mexico, Inc. is on the Board of Directors of Telmex. Telmex is a carrier or controls carriers in Mexico and the United States.¹²

The following persons are officers or directors of one or more of the following: AT&T NCWS Holdings Inc., New Cingular Wireless Services, Inc., AT&T Teleholdings, Inc., SBC Telecom, Inc., BellSouth Mobile Data, Inc., and AT&T Inc. and are also officers or directors of one or more of the following foreign carriers: BellSouth Long Distance, Inc., which is a carrier in Canada; AT&T Global Network Services International, Inc., which is a carrier in Israel, New Zealand, and Pakistan; AT&T Global Network Services Norge LLC, which is a carrier in Norway; and AT&T Global Network Services Venezuela LLC, which is a carrier in Venezuela. Richard P. Resnick is President and a Director of SBC Telecom, Inc., and President of BellSouth Long Distance, Inc. Denise Iverson is Director – Operations of SBC Telecom, Inc. and BellSouth Long Distance, Inc. Gary L. Long is Controller and a Director of SBC Telecom, Inc. and Vice President & Comptroller of BellSouth Long Distance, Inc. George Goeke, Assistant Treasurer of AT&T Inc., is Vice President and Treasurer of BellSouth Long Distance, Inc. and is a Director and Treasurer of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC. Elaine Lou is Assistant Treasurer of SBC Telecom, Inc., BellSouth Long Distance, Inc., AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC. Jeston Dumas is Treasurer of SBC Telecom, Inc. and Assistant Treasurer of BellSouth Long Distance, Inc., AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC. Teresa G. Blizzard is Assistant Secretary of BellSouth Mobile Data, Inc., New Cingular Wireless Services, Inc. and AT&T NCWS Holdings, Inc., Director-Taxes of SBC Telecom, Inc., and is Vice President - Taxes of BellSouth Long Distance, Inc. Mary Jo Peed is Vice President and Secretary of BellSouth Mobile Data, Inc. and Vice President, General Counsel, and Secretary of BellSouth Long Distance, Inc.

¹¹ América Móvil, S.A.B. de C.V., América Móvil Fourth Quarter of 2011 Financial and Operating Report (Form 6-K), at 2, 14 (Feb. 9, 2012). AT&T has relied upon América Móvil's and Telmex's SEC filings to identify the countries where América Móvil or Telmex is a carrier or controls carriers. There may be subsequent developments not reflected in those SEC filings.

¹² Teléfonos de México, S.A.B. de C.V., Annual Report (Form 20-F/A) at 16 (Aug. 31, 2011).

Response to Question 15: Section 214 Authority

Section 63.18(d)

WMS does not hold any international authorizations pursuant to Section 214.

Section 63.18(e)(3)

Not applicable.

63.18(g)

Not applicable.