

Application for Authority Under Section 214 of the Communications Act of 1934, as Amended, to Operate as a Global Facilities-Based and Resale Carrier Between the U.S. and All International Points

Attachment 1

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.18 of the Commission’s rules, CenturyLink Public Communications, Inc. (“CPCI”) seeks Commission consent to provide international telecommunications services on both a facilities-based and a resale basis between the United States and all international points.

Response to Question 9:

CPCI seeks streamlined processing pursuant to Section 63.12 of the Commission’s rules.

CPCI is affiliated with the foreign carriers set forth in the table provided in response to Question 11, paragraph i. All carriers in that table qualify for a presumption of non-dominance under Section 63.10(a)(3) because each has less than a 50 percent market share in the international transport and the local access markets on the foreign end of the route. CPCI therefore qualifies for streamlined processing pursuant to Section 63.12(c)(1)(ii).

Response to Question 11:

CPCI responds to the questions and certifications set forth in Section 63.18(i) through (m) of the Commission’s rules as follows:

(i): CPCI certifies that it is not a foreign carrier but that it is affiliated with the following foreign carriers as set forth in the table below.

Destination Country	Foreign Carrier Affiliates
Australia	CenturyLink Australia Pty. Ltd. Qwest Australia Pty Ltd
Brazil	CenturyLink Comunicações Ltda
Canada	CenturyLink Communications, LLC SAVVIS Communications Canada, Inc.
France	CenturyLink France S.A.S. Qwest France SAS
Germany	CenturyLink Germany GmbH

Destination Country	Foreign Carrier Affiliates
Hong Kong, China	CenturyLink Technology Hong Kong Limited Qwest Hong Kong Telecommunications, Limited
Japan	Qwest Communications Japan Corporation
Korea	CenturyLink Korea Limited Qwest Communications Korea, Ltd
Netherlands	CenturyLink Europe B.V. Qwest Netherlands B.V.
Singapore	CenturyLink Singapore Pte. Ltd. Qwest Singapore Pte Ltd.
Switzerland	CenturyLink Switzerland A G
Chinese Taipei	CenturyLink Taiwan Limited
United Kingdom	Qwest Communications International Ltd.

(j): CPCI certifies that it seeks to provide international telecommunications services to destinations in which CPCI's ultimate parent, CenturyLink, Inc., also controls a foreign carrier in the destination country. These destination countries, along with the affiliates for each country, are set forth in the table provided in response to paragraph (i).

(k): All destination countries listed in response to paragraph (j) above are Members of the World Trade Organization.¹

(l): Not applicable, given that the Commission eliminated the Quarterly Foreign-Affiliated Switched Resale Carrier Reports previously required under Section 43.61(c) of the Commission's rules.²

¹ See "Members and Observers," World Trade Organization, http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (last visited March 23, 2015)

² See *Reporting Requirements for U.S. Providers of International Telecommunications Services*, First Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 7274, 7283 (2011)

(m): All of the foreign carriers listed in response to paragraph (i) as affiliates of CPCI qualify for non-dominant classification pursuant to §63.10(a)(3) of the Commission's rules because the foreign affiliate lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route.

Response to Question 12:

CPCI seeks to provide international telecommunications services between the U.S. and the destinations listed in the table provided in response to paragraph (i), in which an entity that owns more than 25 percent of CPCI also owns or controls a foreign carrier in that country, as described in Section 63.18(j)(3). Embarq Corporation holds 100 percent of CPCI. CenturyLink, Inc. holds 100 percent of Embarq Corporation and also controls the foreign carriers listed in the table provided in response to paragraph (i).

Response to Question 13:

CPCI does not seek to provide services to any destinations other than those referenced in response to Question 12 where it has an affiliation with a foreign carrier.