## **ATTACHMENT 1**

## **Answer to Question 11**

# a. Section 63.18(i) – Certification Regarding Foreign Carrier Status and Foreign Affiliation

Applicant, Liberty Cablevision of Puerto Rico LLC, certifies that it is not currently a foreign carrier. Applicant is affiliated with the following foreign dominant carriers as a result of the transaction in which its ultimate parent, Liberty Global plc ("Liberty Global"), acquired Cable & Wireless Communications plc ("C&W").

Foreign Carrier	Country
Cable and Wireless (Anguilla) Limited	Anguilla
Cable & Wireless Antigua & Barbuda Limited	Antigua and Barbuda
The Bahamas Telecommunications Company Limited	The Bahamas
Cable & Wireless (Barbados) Limited	Barbados
Cable and Wireless (British Virgin Islands) Limited	British Virgin Islands
Cable and Wireless (Cayman Islands) Limited	Cayman Islands
Cable & Wireless Dominica Limited	Dominica
CWC Cable & Wireless Communications Dominican Republic SA	Dominican Republic
Cable & Wireless Grenada Limited	Grenada
Cable & Wireless Jamaica Limited	Jamaica
Cable and Wireless (West Indies) Limited	Montserrat
Cable & Wireless Panama S.A.	Panama
CWC WS Holdings Panama S.A.	Panama
Cable & Wireless (St. Lucia) Limited	St. Lucia
Cable & Wireless St. Kitts & Nevis Limited	St. Kitts and Nevis
Cable & Wireless St. Vincent and the Grenadines Limited	St. Vincent and the Grenadines
Cable & Wireless (Seychelles) Limited	Seychelles

<sup>&</sup>lt;sup>1</sup> See Streamlined International Applications Accepted for Filing, Section 214 Applications (47 C.F.R. § 63.18); Section 310(b) Requests, Public Notice, Report No. Tel-01767S, 2016 FCC Lexis 7 (IB rel. Jan 4, 2016).

Telecommunications Services of Trinidad and Tobago Limited	Trinidad & Tobago <sup>2</sup>
Cable & Wireless (TCI) Limited	Turks and Caicos Islands

Further, Applicant is affiliated with the following non-dominant foreign carriers as a result of Liberty Global's transaction with C&W:<sup>3</sup>

Foreign Carrier	Country
Kelcom International (Antigua & Barbuda) Ltd.	Antigua & Barbuda
Columbus Communications Limited	The Bahamas
Columbus Telecommunications (Barbados) Limited	Barbados
Karib Cable Inc.	Barbados
ARCOS-1USA, Inc.	Belize
Columbus Networks Bonaire, N.V.	Bonaire (Netherlands)
Columbus Networks de Colombia, Ltda.	Colombia
Columbus Networks Zona Franca Ltda.	Colombia
Lazus de Colombia S.A.S	Colombia
Columbus Networks de Costa Rica S.R.L.	Costa Rica
Promitel Costa Rica S.A	Costa Rica
Columbus Communications Curacao N.V.	Curacao (Netherlands)
Columbus Networks Curacao, N.V.	Curacao (Netherlands)
Columbus Networks Netherlands Antilles, N.V.	Curacao (Netherlands)
Columbus Networks Dominicana, S.A.	Dominican Republic
Columbus Networks Centroamerica, S. de R.L.	El Salvador
Columbus Networks El Salvador S.A.	El Salvador
Columbus Communications (Grenada) Limited	Grenada

<sup>&</sup>lt;sup>2</sup> C&W is in the process of divesting its indirect 49% ownership interest in Telecommunications Services of Trinidad and Tobago Limited.

<sup>&</sup>lt;sup>3</sup> None of the carriers listed in this table is listed in the Commission's List of Foreign Telecommunications Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets. In addition, these foreign carriers offer services in competition with dominant foreign carriers and others. These foreign carriers each hold significantly less than a 50% market share in the international transport market between the U.S. and their home markets in the local access markets in the countries where they operate. Moreover, these foreign carriers do not have the ability to discriminate against unaffiliated U.S. international carriers through the control of bottleneck services or facilities to exercise market power in the countries where they operate.

Columbus Networks de Guatemala Limitada	Guatemala
Columbus Networks de Honduras, S. de R.L.	Honduras
Columbus Communications Jamaica Limited	Jamaica
Columbus Networks Jamaica Limited	Jamaica
Columbus Networks de Mexico S. de R.L. de C.V.	Mexico
Columbus Networks Nicaragua y Compania Limitada	Nicaragua
Columbus Networks de Panama S.R.L.	Panama
Promitel Panama S.A.	Panama
Lazus Peru S.A.C.	Peru
Columbus Communications (St. Lucia) Limited	St. Lucia
Tele (St. Lucia) Inc.	St. Lucia
Columbus Communications St. Vincent and the Grenadines Limited	St. Vincent & The Grenadines
Columbus Networks International (Trinidad) Limited	Trinidad & Tobago
Columbus Communications Trinidad Limited	Trinidad & Tobago
Columbus Networks, Limited	Turks & Caicos
Columbus Networks de Venezuela, S.A.	Venezuela

## b. Section 63.18(j) – Certification Regarding Destination Markets

Applicant certifies that it seeks to provide international telecommunications services to all the destination points listed in response to **Question 11 – Section 63.18(i)** above.

## c. Section 63.18(k) – Demonstration Regarding WTO Membership

With the exception of the Bahamas<sup>4</sup>, all of the foreign destination markets identified in response to **Question 11 – Section 63.18(i)** above are members of the World Trade Organization ("WTO").<sup>5</sup>

## d. Section 63.18(l)

This subsection of the regulation has been deleted.

.

<sup>&</sup>lt;sup>4</sup> The Bahamas has applied for WTO membership and currently holds observer status at the WTO.

<sup>&</sup>lt;sup>5</sup> The Commission treats British overseas territories as WTO Members. *See, e.g.*, Letter from Robert E. Dalton, Assistant Legal Adviser for treaty Affairs, United States Dept. of State, to Rebecca Arbogast, Chief, Telecommunications Division, International Bureau, Federal Communications Commission (Feb. 16, 2000). Thus, Anguilla, the British Virgin Islands, the Cayman Islands, Monserrat, and Turks and Caicos should be treated as WTO members for purposes of this application.

## e. Section 63.18(m) – Requests for Non-Dominant Status

Pursuant to Section 63.10(a)(3), Applicant qualifies for a presumption of non-dominant status on all international routes except those listed below because each of the its foreign carrier affiliates (except those listed below) lacks 50% market share in the fixed local access and international transport markets on the foreign end of the route.

Foreign Carrier With Market Power <sup>6</sup>	Country
Cable and Wireless (Anguilla) Limited	Anguilla
Cable & Wireless Antigua & Barbuda Limited*	Antigua and Barbuda
The Bahamas Telecommunications Company Limited*	The Bahamas
Cable & Wireless (Barbados) Limited*	Barbados
Cable and Wireless (British Virgin Islands) Limited*	British Virgin Islands
Cable and Wireless (Cayman Islands) Limited	Cayman Islands
Cable & Wireless Dominica Limited*	Dominica
Cable & Wireless Grenada Limited*	Grenada
Cable & Wireless Jamaica Limited	Jamaica
Cable and Wireless (West Indies) Limited	Montserrat
Cable & Wireless Panama S.A.	Panama
Cable & Wireless (St. Lucia) Limited	St. Lucia
Cable & Wireless St. Kitts & Nevis Limited*	St. Kitts and Nevis
Cable & Wireless St. Vincent and the Grenadines Limited	St. Vincent and the Grenadines
Cable & Wireless (Seychelles) Limited	Seychelles
Telecommunications Services of Trinidad and Tobago Limited	Trinidad & Tobago <sup>7</sup>
Cable & Wireless (TCI) Limited*	Turks and Caicos Islands

## **Answer to Question 12 - Other Destination Markets**

Please see response regarding section 63.18(j) above.

<sup>&</sup>lt;sup>6</sup> The asterisks indicate that the name of the foreign carrier providing service has changed since the Commission issued its *The International Bureau Revises and Reissues the Commission's List of Foreign Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, DA 07-233, 22 FCC Rcd 945 (IB rel. Jan. 26, 2007).

<sup>&</sup>lt;sup>7</sup> C&W is in the process of divesting its indirect 49% ownership interest in Telecommunications Services of Trinidad and Tobago Limited.

## **ATTACHMENT 2**

# Answer to Question 14 -- Section 63.18(h) - Ten Percent or Greater Shareholders

Please see the organization chart on the following page.

The Applicant does not have any interlocking directorates with foreign carriers.

Answer to Question 15 – Section 63.18(d), 63.18(e), and 63.18(g).

## a. Section 63.18(d) – Previous Authorizations

Applicant has not previously received authority under Section 214 of the Act.

## b. Section 63.18(e)(3), (g) – Requests for Authority

Applicant does not request authority to acquire facilities or provide services not otherwise covered by the authority requested pursuant to Section 63.18(e)(1)-(2) of the Commission's rules.

