

**International Optical Network LLC
International Section 214 Authorization
Notice of Pro Forma Assignment**

ATTACHMENT 1

Pursuant to sections 63.24(d) and (f) of the Commission’s rules, 47 C.F.R. §§ 63.24(d), (f), International Optical Network LLC (“ION”) respectfully notifies the Commission of the *pro forma* assignment of its international section 214 authorization, File No. ITC-214-19980520-00334, to its affiliate, Global Crossing North America, Inc. (“GCNA”). As described below, ION and GCNA are under common ownership and control.

I. DESCRIPTION OF THE TRANSACTION

ION, GCNA, and certain of their affiliates, which collectively hold a number of international section 214 authorizations, have commenced a process to streamline their overall licensing structure. As part of that effort, ION—which no longer provides any services and does not have any customers¹—has assigned its international section 214 authorization (with File No. ITC-214-19980520-00334) to GCNA. ION and GCNA are both indirect, U.S. subsidiaries of Temasek Holdings (Private) Limited (“Temasek”). Because Temasek thus continues to have ultimate control of this license, the assignment from ION to GCNA is considered *pro forma* under the Commission’s rules. *See* 47 C.F.R. § 63.24(d) (“[A]ssignments that do not result in a change in the actual controlling party are considered non-substantial or *pro forma*.”); *id.*, Note 2 (stating that a “an assignment from a corporation to a corporation owned or controlled by the assignor stockholders without substantial change in their interests” is presumptively *pro forma*).

After the Commission releases a public notice in connection with this *pro forma* assignment, several wholly-owned subsidiaries of GCNA that currently hold their own

¹ Accordingly, the customer notification requirements under Section 63.19 of the Commission’s rules do not apply.

international section 214 authorizations intend to surrender those authorizations and operate under the former ION authorization that has now been assigned to GCNA.

II. RESPONSES TO SPECIFIC QUESTIONS

Answer to Question 10

Per 47 C.F.R. § 63.18(c) of the Commission's rules, correspondence concerning this *pro forma* notification should be sent to the following:

Paul Kouroupas
Security Officer & Vice President, Regulatory Affairs
Global Crossing Limited
200 Park Avenue, Suite 300
Florham Park, New Jersey 07932
(973) 937-0100

With a copy to:

Teresa D. Baer
Brian W. Murray
Latham & Watkins LLP
555 11th Street, N.W.
Suite 1000
Washington, D.C. 20004
(202) 637-2200

Per 47 C.F.R. § 63.18(d) of the Commission's rules, the assignor, ION, previously received international section 214 authority pursuant to File No. ITC-214-19980520-00334. The assignee, GCNA, has not previously received such authority.

Answer to Question 11

The following are the names, addresses, citizenship, and principal businesses of any person or entity that will directly or indirectly own at least ten percent of the equity of the assignee, GCNA:

Global Crossing North American Holdings, Inc. (“GCNAH”)

Address: 225 Kenneth Drive, Rochester, New York 14623-4277

Citizenship: Delaware

Principal Business: Holding company

Relationship: 100 percent owner of GCNA

Global Crossing Holdings Limited

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: Holding company

Relationship: 100 percent owner of GCNAH

Global Crossing Limited (“GCL”)

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: Telecommunications

Relationship: 100 percent owner of Global Crossing Holdings Limited

STT Crossing Ltd. (“STT Crossing”)

Address: 10 Frere Felix de Valois Street, Port Louis, Mauritius

Citizenship: Mauritius

Principal Business: Holding company

Relationship: 66.25 percent owner of GCL

Fidelity Management & Research Co.

Address: 82 Devonshire Street, Boston, Massachusetts 02109

Citizenship: United States

Principal Business: Investment firm

Relationship: 14.4 percent owner of GCL

STT Communications Ltd (“STT Communications”)

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Holding company

Relationship: 100 percent owner of STT Crossing

Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”)

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 100 percent owner of STT Communications²

² Of this amount, 0.01 percent of STT Communications’ shares are held by current members of ST Telemedia’s management, all of whom are citizens of Singapore, as nominees of and in trust for ST Telemedia.

Temasek Holdings (Private) Limited

Address: 60B Orchard Road #06-18, The Atrium@Orchard, Singapore 238891

Citizenship: Singapore

Principal Business: Investment holding company

Relationship: 100 percent owner of ST Telemedia

Answer to Question 12

Two current directors of GCNA are also directors of foreign carriers. Specifically, Mitchell C. Sussis is Vice President and Secretary of Global Crossing Australia Pty Limited; Vice President and Secretary of Global Crossing Hong Kong Limited; Vice President and Secretary of Global Crossing Telecommunications-Canada, Ltd.; and Vice President, Secretary, and Director of PAC Panama Ltd. In addition, John Kritzmacher is the President of Global Crossing Telecommunications-Canada, Ltd.

Answer to Question 13

See Section I above (Description of Transaction).