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April 29, 2011

Via IBFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

**Re: Notification of the *Pro Forma* Merger of Tata Communications Services
(America) Inc. with and into Tata Communications (America) Inc.**

Dear Ms. Dortch:

Tata Communications (America) Inc. ("Tata America"), by undersigned counsel and pursuant to 47 C.F.R. § 63.24(f)(2), notifies the Commission that on March 30, 2011, Tata Communications Services (America) Inc. ("Tata Services") merged with and into Tata America, with Tata America surviving. As a result of this intracorporate *pro forma* merger, the international Section 214 license held by Tata Services, ITC-214-20030728-00376, was transferred to Tata America.

As required by Section 63.24(f)(2), Tata America provides the following information required by 63.18(a) through (d) and (h):

Section 63.18(a): Name, address and telephone number of the Parties:

Tata Communications (America) Inc.	FRN	0009480302
Tata Communications Services (America) Inc.	FRN	0009183872
2355 Dulles Corner Boulevard		
Suite 700		
Herndon, VA 20171		
Tel: (703) 657-8412		

Section 63.18(b): The Parties are/were organized as follows:

Tata America is a Delaware corporation.
Tata Services was a Delaware corporation.

Boston
Frankfurt
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
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Section 63.18(c): Correspondence concerning this filing should be sent to:

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(202) 373-6001 (Fax)
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danielle.burt@bingham.com

Section 63.18(d):

Tata America is authorized to provide interstate service by virtue of blanket domestic Section 214 authority, pursuant to 47 C.F.R. § 64.01. In addition, Tata America holds the following international Section 214 authorizations, submarine cable landing licenses, and signaling point code authorizations:

- ITC-214-19950805-00017 (resale private lines not interconnected to the public switched network)
- ITC-214-19950805-00018 (resale international switched services)
- ITC-214-19950805-00019 (resale private lines interconnected with the public switched network at one or both ends for the provision of switched services)
- ITC-214-19960118-00005 (resale interconnected private lines between the U.S. and Sweden for the provision of switched services)
- ITC-214-19960723-00334 (facilities-based service to operate facilities on CANUS-1 cable system for the provision of service to all destination countries except Canada)
- ITC-214-19960723-00335 (facilities-based service to operate facilities for the provision of service to Canada and beyond)
- ITC-214-19960723-00336 (limited global resale service to lease private lines between the U.S. and Canada for the provision of switched and private line services)
- ITC-214-19960826-00371 (limited global facilities-based authority for all international points except Canada)
- ITC-214-19980430-00923 (operate capacity in the AMERICAS-II cable system)

- SCL-LIC-19980430-00006 (AMERICAS-II cable system landing license)
- ITC-214-19980527-00346 (facilities-based service to operate capacity in the COLUMBUS-III cable system)
- SCL-LIC-19980527-00007 (COLUMBUS-III cable system landing license between Hollywood Florida and Italy, Spain, and Portugal)
- SCL-LIC-19980309-00005 (China-U.S. cable system landing license between the U.S., China, Taiwan, Japan, South Korea, and Guam)
- SCL-LIC-19981117-00025 (Japan-U.S. cable system landing license between the U.S. and Japan)
- SCL-LIC-19990303-0004 (TAT-1 cable system landing license between Manasquan, New Jersey and Tuckerton, New Jersey and Denmark, Germany, the Netherlands, France and the United Kingdom)
- SPC-NEW-20071227-00032 (International Signaling Point Code for Los Angeles, California)
- SPC-NEW-20071227-00025 (International Signaling Point Code for Newark, New Jersey)
- SPC-NEW-20060217-00005 (International Signaling Point Code for Newark, New Jersey)
- SPC-NEW-20060217-00004 (International Signaling Point Code for Los Angeles)
- SPC-NEW-20071227-00029 (International Signaling Point Code for New York)
- SPC-NEW-19990920-00074 (International Signaling Point Code for Los Angeles)
- SPC-NEW-19990920-00075 (International Signaling Point Code for Newark)
- SPC-NEW-19960715-00047 (International Signaling Point Code for New York)¹

¹ The signaling point codes authorized pursuant to SPC-NEW-19990920-00074, SPC-NEW-19990920-00075, and SPC-NEW-19960715-00047 were formerly held by Teleglobe USA, Inc. To the extent necessary, Tata America requests that the Commission update its records accordingly.

- SPC-NEW-20000629-00037 (International Signaling Point Code for Jersey City)²

Tata Services held International Section 214 Authority to provide global facilities-based and resale authority and international switched and private line services granted in IB File No. ITC-214-20030728-00376.

Section 63.18(h): The following entities hold a 10% or greater, direct or indirect, interest in Tata America:

Name: VSNL International (ITXC) Corp.
Address: c/o Tata Communications
2355 Dulles Corner Boulevard
Suite 700
Herndon, VA 20171
Citizenship: U.S. (Delaware corporation)
Principal Business: Holding Company
Interest: 100%

Name: Tata Communications (Netherlands) B.V.
Address: Locatellikade 1
1076 AZ Amsterdam
The Netherlands
Citizenship: The Netherlands
Principal Business: Holding Company
Interest: 100% of VSNL International (ITXC) Corp.

Name: Tata Communications International Pte. Ltd.
Address: 35 Tai Seng Street
Tata Communications Exchange, #06-01
Singapore 534103
Citizenship: Singapore
Principal Business: Provision of telecommunications and telecommunications related services, and Holding Company
Interest: 100% of Tata Communications (Netherlands) B.V.

Name: Tata Communications Limited
Address: C-21 and C-36, G Block
Bandra Kurla Complex

² The signaling point code authorized pursuant to SPC-NEW-20000629-00037 was formerly held by ITXC Data Transport Services, LLC. To the extent necessary, Tata America requests that the Commission update its records accordingly.

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Mumbai – 400098, India
Citizenship: India
Principal Business: International telecommunications, domestic India long distance, and other value-added services
Interest: 100% of Tata Communications International Pte. Ltd.

The largest accumulation of interests in Tata Communications Limited (“TCL”) is held by various entities within the Tata companies, an Indian commercial conglomerate consisting of approximately 80 companies operating in seven different market sectors including chemicals, engineering, energy, automotive, communications, and consumer goods. The Tata companies’ aggregate ownership interest in TCL as of March 31, 2011 is 50.11%. Entities within the Tata companies that hold interests in TCL include:

Name and Address:	Interest held in TCL:
Panatone Finvest Ltd. Bombay House 24 Homi Modi Street Mumbai, India, 400 001	40.70%
The Tata Power Company Limited 24 Homi Modi Street Mumbai, India 400 001	0.90%
Tata Sons Limited 24 Homi Street Mumbai, India 400 001	8.51%

In addition, the Government of India holds a 26.12% interest in TCL. The address for the department that administers the Government of India’s interest is as follows: Secretary, Department of Telecommunications, Sanchar Bhawan, 20 Ashoka Road, New Delhi, India 110001.

There are no other shareholders of TCL who directly or indirectly own 10% or more of TCL and thus indirectly own 10% or more of Tata America.

Interlocking directorates: To the best of our knowledge, the following individuals are officers or directors of TCL and officers and directors of foreign carriers:

Satish Ranade, Company Secretary and Chief Legal Officer of TCL (India); is also Director of VSNL Lanka Limited (Sri Lanka); Director of Tata Communications Internet Services Limited (India); Director of S&A Internet Services Private Limited; and Director of Neotel Pty Limited (South Africa).

Srinath Narasimhan, Director of TCL (India); is also Director of Tata Communications International Pte. Ltd. (Singapore); Managing Director of Tata Teleservices (Maharashtra) Limited (India); Managing Director of Tata Teleservices Ltd; Director of Viom Infra

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Networks (Maharashtra) Ltd; and Director and Chairman of the Board of Directors of Neotel (Pty) Limited (South Africa).

Vinod Anandkumar Kumar, Managing Director and CEO of TCL (India); is also President and Managing Director of Tata Communications International Pte. Ltd. (Singapore); and Executive Vice President & Head of Wholesale and Enterprise Line of Business of Tata Communications (Canada) ULC.

Subodh Bhargava, Chairman of the Board of Directors for TCL (India); is also Chairman of the Board of Directors of Tata Communications International Pte. Ltd. (Singapore).

Amal Ganguli, Director of TCL (India); is also Director of Hughes Communications (India) Ltd; Director of Tata Teleservices (Maharashtra) Ltd; and Director of Tata Telecommunications Ltd.

Kishor A. Chaukar, Director of TCL (India); is also Director of Tata Communications International Pte. Ltd. (Singapore); Director of Tata Teleservices Limited; and Director of Tata Teleservices (Maharashtra) Ltd.

Sanjay Baweja, Chief Financial Officer of TCL (India); is also Director of Tata Communications (Australia) Pty Limited, Tata Communications (America) Inc., TcPoP Communication GmbH, Tata Communications (Belgium) SPRL, Tata Communications (Canada) ULC, Tata Communications Deutschland GmbH, Tata Communications (Guam) L.L.C., Tata Communications (Hong Kong) Limited, Tata Communications (Ireland) Limited, Tata Communications (Italy) S.r.l., Tata Communications (Japan) KK, Tata Communications (Netherlands) BV, Tata Communications (Nordic) AS, Tata Communications (Poland) Sp. z o.o., Tata Communications (Portugal) Instalacao e Manutencao de Redes LDA, Tata Communications (Puerto Rico) Inc., Tata Communications (Russia) LLC, Videsh Sanchar Nigam Spain Srl, Tata Communications (Sweden) AB, Tata Communications (Switzerland) GmbH, Tata Communications (UK) Limited, Tata Communications (Taiwan) Limited, Neotel (Proprietary) Limited (South Africa), Tata Communications Internet Services Limited (India), S&A Internet Services Private Limited (India), Tata Communications (Hungary) LLC.

Mr. Arun Gandhi, Director of TCL (India); is also Director of Tata Communications International Pte. Ltd (Singapore).

Dr. Ashok Jhunjhunwala, Director of TCL (India); is also Director of Sasken Communications Technologies Ltd.; Director of Tata Teleservices (Maharashtra) Ltd.; and Director of Tejas Networks Limited.

Mr. S Ramadorai, Director of TCL (India); is also Director of Tata Teleservices (Maharashtra) Limited; and Director of Tata Communications International Pte. Ltd (Singapore).

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Tata America certifies that the merger was *pro forma* and that, together with all previous *pro forma* transactions, did not result in a change in the change in the ultimate owners of any of the parties. Attached as Exhibit 1 is a certificate.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Danielle Burt".

Catherine Wang
Danielle Burt

Counsel to Tata Communications (America) Inc.

Certificate

I hereby certify that the merger described in the foregoing letters was a *pro forma* merger and that, together with all previous *pro forma* transactions, did not result in a change in the licensees' ultimate control.

A handwritten signature in black ink, appearing to read "David Ryan", written over a horizontal line.

David Ryan
Executive Vice President and
Head of North America
Tata Communications (America) Inc.

Dated: April 27, 2011