
ARNOLD & PORTER LLP

Theodore D. Frank
Theodore.Frank@aporter.com

202.942.5790
202.942.5999 Fax
301.275.9049 Cell

555 Twelfth Street, NW
Washington, DC 20004-1206

December 13, 2011

VIA FEDERAL EXPRESS

Federal Communications Commission
c/o U.S. Bank - Government Lockbox #979093
SL-MO-C2-GL
1005 Convention Plaza
St. Louis, MO 63101

Re: Application of BellSouth Long Distance, Inc. ("BSLD") and Sprint
Communications Company LP for the Assignment of BSLD's Interest in
international Section 214 Authorization (ITC-214-19990325-00153)

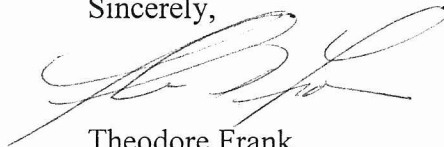
Dear Ms. Dortch:

Enclosed please find an application for approval of the assignment BellSouth Long Distance, Inc.'s ("BSLD") international Section 214 authorization (File No. ITC-214-19990325-00153) from BSLD to Sprint Communications Company LP.

As further explained in the attached, Applicants also request a waiver of Section 1.10006 of the Commission's rules, 47 C.F.R. § 1.10006, which requires that this application be filed electronically.

If you have any questions regarding the application and related waiver request, please contact me at 202-942-5790 or at Theodore.Frank@aporter.com. Thank you for your assistance.

Sincerely,



Theodore Frank
Counsel for BellSouth Long Distance, Inc.

Enclosures

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of the Application of)
)
BellSouth Long Distance, Inc.)
)
and) File No. ITC- _____
)
Sprint Communications Company LP)
for Commission Consent for)
the assignment of international)
Section 214 authorization)
ITC-214-19990325-00153 From BellSouth)
Long Distance, Inc. to Sprint Communications)
Company LP)

**APPLICATION FOR CONSENT TO THE ASSIGNMENT OF AN
INTERNATIONAL SECTION 214 APPLICATION**

Pursuant to Section 63.24(b) of the Commission's rules, BellSouth Long Distance, Inc. ("BSLD") hereby requests consent to the assignment to Sprint Communications Company LP ("Sprint")¹ of BSLD's international Section 214 authorization, ITC-214-19990325-00153, pursuant to which it is co-licensed to operate capacity in a Americas 1 digital submarine cable system, MAYA-1 (FCC File No. SCL-LIC-19990325-00006).²

¹ A separate application is being filed for consent of the assignment of BSLD's interest in the MAYA-1 cable to Sprint.

² While this authorization is currently listed in IBFS as held by Tricom USA, Inc., BSLD is a co-licensee. A notification of the assignment to BSLD of an interest in this authorization was filed in April of 2006. See IBFS File No. ITC-ASG-20060412-00246 (granted April 19, 2006). IBFS will not allow BSLD to make this filing electronically because the authorization is under Tricom's name. Accordingly, BSLD requests a waiver of 47 C.F.R. 1.10006 (requiring electronic filing).

Description of Transaction and
Public Interest Statement

On August 11, 2006, prior to AT&T's acquisition of control of BellSouth Corporation, BSLD sold its interest in the MAYA-1 cable to Sprint and ceased providing service under this authorization. To the best of the knowledge, information and belief of the current employees of AT&T and BSLD, BSLD was not providing service to any customers using this authorization and therefore was not required to provide any notice to customers under Section 63.19(a)(1) of the Commission's rules.

The failure to notify the Commission in a more timely manner was inadvertent. The transfer of BSLD's interest to Sprint came to light in connection with the preparation of a notification filed on August 1, 2011 concerning an internal restructuring of AT&T Inc.'s subsidiaries which involved, *inter alia*, in the *pro forma* transfer of control of BSLD. This notification is being filed promptly upon AT&T's, BSLD's and Sprint's learning of this situation and verifying the information concerning it.

The Public Interest. Grant of this application will serve the public interest. BSLD no longer holds any interest in MAYA-1 and is not serving any customers using the cable system. Sprint is, and was at the time of the assignment of BSLD's interest in the cable system, a co-licensee of the system. Moreover, Sprint held and currently holds an international Section 214 authorization for the MAYA-1 system. Consequently, Sprint is fully qualified to hold the provide service under BSLD Section 214 authorization and and grant of this application will regularize the Commission's data concerning the use of MAYA-1.

Answer to Question 10

(a) Section 63.18(c): *The name, title, address and telephone number of the officer to whom any correspondence should be directed is as follows:*

- (1) ***Assignor (BellSouth Long Distance, Inc.)***
Mary Jo Peed
Vice President, General Counsel, and Secretary
BellSouth Long Distance, Inc.
675 W. Peachtree St. NW
Room 4319
Atlanta, GA 30375
Tel: (404) 335-0705

with a copy to:

Peter J. Schildkraut
Arnold & Porter LLP
555 Twelfth Street, NW
Washington, DC 20004
Tel: (202) 942-5634
Fax: (202) 942-5999

- (2) ***Assignee (Sprint Communications Company LP) Information:***
Joe F. Meyer
Vice President, Service Management
Sprint
KSOPHR0212 - 2B651
6550 Sprint Parkway
Overland Park, KS 66251
Tel: (913) 735-1400

with a copy to:

David A. Nall
Senior Counsel, Government Affairs
Sprint
Suite 700
900 7th St., NW
Washington, DC 20001
Tel: (703) 592-5209

(b) Section 63.18(d) *Statement re previous Section 214 authority and a general description of the facilities and service authorized:*

BellSouth Long Distance, Inc.:

BSLD had, and has, international Section 214 authority to provide service to various countries around the globe, including the countries served by MAYA-1, which lands in Florida in the United States, and in the Cayman Islands, Colombia, Costa Rica, Honduras, Mexico and Panama. Cable systems in which it currently has an interest are as follows:

Entity Name	Authorization Number	Description
BellSouth Long Distance, Inc.	ITC-214-19970122-00039	Authorization to provide resold switched service in accordance with the provisions of Section 63.18(e)(2) of the rules for communications originating outside of BellSouth's region, and terminating at international points. See Appendix A.
BellSouth Long Distance, Inc.	ITC-214-19971017-00637	Authorization to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules for communications originating outside of Bell South's region and terminating at international points.

Entity Name	Authorization Number	Description
BellSouth Long Distance, Inc.	ITC-214-19980728-00520	Authorization to operate as a facilities-based and resale carrier in accordance with the provisions of Section 63.18(e)(1) and (e)(2) of the rules for communications originating outside of BellSouth's region. IT IS ORDERED that any agreements that BellSouth International Long Distance Services, Inc. (BSILDS), negotiates with foreign carriers to route U.S. inbound switched traffic to the BellSouth Telecommunications, Inc., in-region states via BSILDS's authorized private lines are subject to our Section 43.51(e) requirements.
BellSouth Long Distance, Inc.	ITC-214-19990218-00144	Authorization to operate a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules originating from all points in the United States except the in-region states served by its local exchange carrier affiliate, BellSouth Telecommunications, Inc.
BellSouth Long Distance, Inc.	ITC-214-20020219-00085	Authorization to provide service in accordance with the provisions of section 63.18 (e)(1) and (2) of the Commission's rules, specifically: (1) authority to provide global international facilities-based service between all points in both Georgia and Louisiana and all international points, except countries listed on the Commission's exclusion list; and (2) authority to provide global resale services between all points in both Georgia and Louisiana and all international points.

Entity Name	Authorization Number	Description
BellSouth Long Distance, Inc.	ITC-214-20020628-00328	Authorization to provide service in accordance with the provisions of section 63.18 (e)(1) and (2) of the Commission's rules, specifically: (1) authority to provide global international facilities-based service between all points in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina and all international points, except those countries listed on the Commission's exclusion list; and (2) authority to provide resale service between all points in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina and all international points.
BellSouth Long Distance, Inc.	ITC-214-20021009-00500	Authorization to provide service in accordance with the provisions of section 63.18(e)(1) and (2) of the Commission's rules, specifically: (1) authority to provide global international facilities-based service between all points in the states of Florida and Tennessee and all international points, except those countries listed on the Commission's exclusion list; and (2) authority to provide resale service between all points in the state of Florida and Tennessee and all international points.
BellSouth International, LLC	ITC-214-19971017-00638	Authorization to operate a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules for communications originating outside of Bell South's region and terminating at international points.

Sprint Communications Company LP

Entity Name	Authorization Number	Description
Sprint Communications Company, L.P,	I-T-C-96-392	Authorization for the provision of facilities-based services between the United States and all international points: (1) which are not listed on the Commission's exclusion list; and (2) where Sprint has certified it does not have an affiliation with a facilities-based foreign carrier within the meaning of Section 63.18(h)(1)(i)(A) and (B) of the Commission's rules, 47 C.F.R. § 63.18(h)(1)(i)(A) and (B).
Sprint Communications Company, L.P,	I-T-C-92-247	Authorization to lease and operate facilities for direct service between the U.S. and Aruba, Honduras, Cayman Islands, Uruguay and Netherlands Antilles.
US Sprint Communications Company, L.P,	I-T-C-90-005	Authorization to acquire and operate facilities for direct service between U.S. and Mexico
US Telecom, Inc..	I-T-C-86-023	Authroization to provide switched voice service, packet switching services and INTELSAT Business Services between the US and Canada, Mexico, United Kingdom, Italy, Japan, Spain, France, Hong Kong, South Korea, Panama, Nicaragua, Honduras, Guatemala, El Salvador, Costa Rica, Netherlands and Belgium.
US Sprint	I-T-C-86-133	Authorization to acquire and operate facilities for service to Venezuela.
US Sprint	I-T-C-86-134	Authorization to acquire and operate facilities for service to Panama.
US Sprint Communications Company, L.P,	I-T-C-90-170	Authorization to acquire and operate facilities for direct service between the U.S. and Panama and El Salvador.

Entity Name	Authorization Number	Description
US Sprint Communications Company, L.P,	I-T-C-89-030	Authorization to acquire and operate facilities for direct service to Colombia.

Answer to Question 11:

Section 63.18(h)

(a) State of Incorporation/Organization of BSLD & Sprint

BSLD is a Corporation organized under the laws of the state of Delaware.

Sprint Communications Company LP is a Limited Partnership organized under the laws of the state of Delaware.

(c) Correspondence concerning this application should be addressed to the following:

For BellSouth Long Distance, Inc.

James J.R. Talbot
AT&T Services, Inc.
1120 Twentieth Street, NW
Suite 1000
Washington, DC 20036
Tel: (202) 457-3048
Fax: (202) 457-3073

with copy to:

Peter J. Schildkraut
Arnold & Porter LLP
555 Twelfth Street, NW
Washington, DC 20004
Tel: (202) 942-5634
Fax: (202) 942-5999

For Sprint Communications Company LP

David A. Nall
Senior Counsel, Government Affairs
Sprint
Suite 700
900 7th St., NW
Washington, DC 20001
Tel: (703) 592-5209

Answer to Question 11

Section 63.18(h) *Ownership of Assignee:*

Sprint is a wholly-owned indirect subsidiary of Sprint Nextel Corporation, 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 Sprint Nextel Corporation.

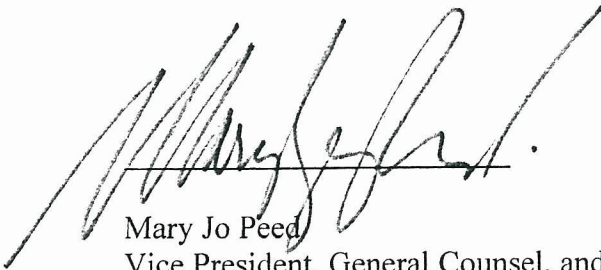
Answer to Question 12:

Section 63.09(g)

(a) There are no officers or directors of Sprint who are also officers or directors of any foreign carrier.

(b) Sprint is not affiliated with any foreign carrier.

Respectfully submitted,



Mary Jo Peed
Vice President, General Counsel, and Secretary
BellSouth Long Distance, Inc.
675 W. Peachtree St. NW
Room 4319
Atlanta, GA 30375
Tel: (404) 335-0705

Joe F. Meyer
Vice President, Service Management
Sprint
KSOPHR0212 - 2B651
6550 Sprint Parkway
Overland Park, KS 66251
Tel: (913) 735-1400

December 1, 2011.

For Sprint Communications Company LP

David A. Nall
Senior Counsel, Government Affairs
Sprint
Suite 700
900 7th St., NW
Washington, DC 20001
Tel: (703) 592-5209

Answer to Question 11

Section 63.18(h) *Ownership of Assignee:*

Sprint is a wholly-owned indirect subsidiary of Sprint Nextel Corporation, 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 Sprint Nextel Corporation.

Answer to Question 12:

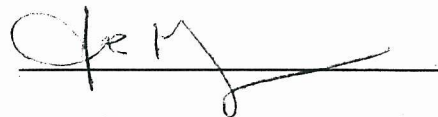
Section 63.09(g)

(a) There are no officers or directors of Sprint who are also officers or directors of any foreign carrier.

(b) Sprint is not affiliated with any foreign carrier.

Respectfully submitted,

Mary Jo Peed
Vice President, General Counsel, and Secretary
BellSouth Long Distance, Inc.
675 W. Peachtree St. NW
Room 4319
Atlanta, GA 30375
Tel: (404) 335-0705



Joe F. Meyer
Vice President, Service Management
Sprint
KSOPHR0212 - 2B651
6550 Sprint Parkway
Overland Park, KS 66251
Tel: (913) 735-1400

December 7, 2011.