

**ATTACHMENT 1 TO FCC ELECTRONIC FORM
FOR PARTIAL ASSIGNMENT
OF INTERNATIONAL SECTION 214 AUTHORIZATION**

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”), and Section 63.24 of the Commission’s rules, 47 C.F.R. § 63.24, E.N.M.R. Telephone Cooperative (“E.N.M.R.”) and Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”) hereby request Commission consent to the partial assignment of the international Section 214 authorization held by E.N.M.R. to allow the transition of customers from E.N.M.R. to Verizon Wireless. E.N.M.R. will retain its Section 214 authorization after the closing and by this Application does *not* seek to assign it.

ANSWER TO QUESTION 10 - Section 63.18(c)-(d):

Assignor Contact Information

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Verizon Wireless is organized under the laws of Delaware. E.N.M.R. is organized under the laws of New Mexico.

The Assignor, E.N.M.R., currently holds one international Section 214 authorization to provide global resale services. *See* File No. ITC-214-20030912-00436. E.N.M.R. will retain its Section 214 authorization after the closing and by this Application does *not* seek to assign it.

The Assignee, Verizon Wireless, holds a number of international Section 214 authorizations to provide global facilities-based and resale services, including File Nos. ITC-214-19920813-00076, ITC-214-19960924-00461, ITC-214-19961008-00504, ITC-214-20001221-00729, ITC-214-20001221-00730, ITC-214-20001221-00731, ITC-214-20001221-00732, ITC-214-20001221-00733, ITC-214-20001221-00734, ITC-214-20001221-00735, ITC-214-20001221-00736, ITC-214-20010504-00279, ITC-214-20040826-00343, ITC-MOD-20070319-00191, and ITC-MOD-20070828-00362.

ANSWER TO QUESTION 11 – Section 63.18(h):

The ultimate 10 percent or greater interest holders in Verizon Wireless are Verizon Communications Inc. (“Verizon”) and Vodafone Group Plc (“Vodafone”).

Verizon Communications Inc.
140 West Street
New York, NY 10007
Principal Business: Holding company that owns operating subsidiaries that provide a range of communications services.
Citizenship: Delaware (U.S.) Corporation
Percentage Held: 55 percent indirect interest

Vodafone Group Plc
Vodafone House
The Connection
Newbury

Berkshire RG14 2FN
 U.K.
 Principal Business: Wireless, Competitive Fixed and Satellite Telecommunications Services
 Citizenship: United Kingdom
 Percentage Held: 45 percent indirect interest

No other person or entity holds a ten percent or greater direct or indirect interest in Verizon Wireless.

ANSWER TO QUESTION 12

There are no interlocking directorates between Verizon Wireless and a foreign carrier. Holycess Hess Groos is a director of both Verizon and Vodafone Omnitel N.V., a carrier in Italy.

ANSWER TO QUESTION 13 – Narrative of Partial Assignment and Public Interest Statement

Please see Attachment 2.

ANSWER TO QUESTION 14 – Section 63.18(i):

Verizon Wireless certifies that it is not a foreign carrier, as that term is defined by Section 63.09 of the Commission’s rules, 47 C.F.R. § 63.09.

Verizon Wireless certifies that, through its ownership by Verizon and Vodafone, it is affiliated with the following foreign carriers:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
GTE Far East (Services) Limited	Japan, Hong Kong
Gateway Telecommunications	Cameroon, Ghana, Ivory Coast, Kenya, Mozambique, Nigeria, and South Africa
Vodafone Albania Sh.A	Albania
Verizon Argentina SRL	Argentina
Verizon Australia Pty Limited	Australia
Vodafone Hutchinson Australia Pty Limited	Australia
Verizon Austria GmbH	Austria
NV Verizon Belgium Luxembourg S.A.	Belgium, Luxembourg
Verizon Telecomunicações do Brasil Ltda	Brazil
Verizon Bulgaria EOOD	Bulgaria
Verizon Canada Ltd.	Canada
Verizon Chile S.A.	Chile
Verizon Colombia S.A.	Colombia

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Vodacom Congo (RDC) s.p.r.l.	Democratic Republic of Congo
Verizon Czech s.r.o.	Czech Republic
Vodafone Czech Republic a.s.	Czech Republic
Verizon Denmark A/S	Denmark
Vodafone Egypt Telecommunications S.A.E.	Egypt
Vodafone Fiji Limited	Fiji
Verizon Finland Oy	Finland
Verizon France SAS	France
Société Française de Radiotéléphone S.A.	France
Verizon Deutschland GmbH	Germany
Vodafone D2 GmbH; Arcor AG & Co. KG	Germany
Ghana Telecommunications Company Limited	Ghana
Verizon Hellas Telecommunications Single Member LLC	Greece
Vodafone-Panafon Hellenic Telecommunications Company S.A.	Greece
Verizon Hong Kong Limited	Hong Kong
Verizon Hungary Mobile Telecommunications LLC	Hungary
Vodafone Hungary (Vodafone Magyarország Mobil Távközlési Zártkörűen Működő Részvénytársaság)	Hungary
Verizon Communications India Private Limited	India
Vodafone India Limited	India
Verizon Ireland Limited	Ireland
Vodafone Ireland Limited	Ireland
Verizon Italia S.p.A.	Italy
Vodafone Omnitel N.V. Teletu S.p.A	Italy
Verizon Japan Limited	Japan
Safaricom Limited	Kenya
Verizon Korea Limited	Korea
Vodacom Lesotho (Pty) Limited	Lesotho
Vodafone Malta Limited	Malta
Verizon Servicios Empresariales Mexico, S de R. L. de C.V.	Mexico
VM, S.A.	Mozambique
Verizon Nederland BV	Netherlands
Vodafone Libertel B.V.	Netherlands
Verizon New Zealand Limited	New Zealand
Vodafone New Zealand Limited	New Zealand
Verizon Norway AS	Norway
Verizon Panama S.A.	Panama
Verizon Peru SRL	Peru
Verizon Polska Sp. Z.o.o.	Poland
Verizon Portugal Sociedade Unipessoal, LDA	Portugal
Vodafone Portugal-Comunicações Pessoais, S.A.	Portugal
Vodafone Qatar Q.S.C.	Qatar

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Vodafone Romania S.A.	Romania
Verizon Romania SRL	Romania
MCI (CIS) LLC	Russia
Verizon Communications Singapore Pte Ltd.	Singapore
Verizon Communications Slovakia s.r.o.	Slovakia
Verizon South Africa (Pty) Limited	South Africa
Vodacom Group Limited	South Africa
Verizon Spain S.L.	Spain
Vodafone España S.A.U.	Spain
Verizon Sweden AB	Sweden
Verizon Switzerland AG	Switzerland
Verizon Taiwan Co. Limited	Taiwan (Chinese Taipei)
Vodacom Tanzania Limited	Tanzania
Verizon International Telecommunications Commerce LLC	Turkey
Vodafone Telekomunikasyon a.s.	Turkey
Verizon UK Limited	United Kingdom
Vodafone Limited	United Kingdom
Verizon Venezuela, S.A.	Venezuela

ANSWER TO QUESTION 15 – Section 63.18(j):

Verizon Wireless hereby certifies that it is not a foreign carrier in any destination market and does not control a foreign carrier in any destination market.

Verizon Wireless hereby certifies that it provides international telecommunications services to all of the destination markets identified in response to Question 14 above in which Vodafone and/or Verizon controls a foreign carrier.

ANSWER TO QUESTION 16 – Section 63.18(k):

Verizon Wireless seeks non-dominant classification on all routes in which Verizon or Vodafone controls a foreign carrier except the U.S.-Ghana route.

The instant partial assignment application creates no new foreign carrier affiliations for Verizon Wireless. The Commission has previously reviewed various Verizon Wireless foreign carrier affiliates. Other than Verizon Wireless’s affiliates in Ghana, the Commission has not found that any of these entities possess market power.¹ These foreign carriers lack 50 percent market share

¹ See *Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18433, ¶ 179 (2005); *Verizon Wireless and Atlantis Holdings LLC (Transfer of Control)*, Memorandum Opinion and Order and

in the international transport and the local access markets in the destination markets where they provide services. None of these foreign carriers is listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.

Finally, as demonstrated below, Verizon Wireless's affiliates in Bulgaria, Lesotho, Mozambique, Romania, Slovakia, and Tanzania also lack market power in their respective destination markets and qualify for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3). None of these foreign carriers is listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets. Information about each of these carriers is provided below:

- Verizon Bulgaria EOOD is Verizon Wireless's affiliate in Bulgaria. This entity is authorized to provide fixed voice, data (PIP), Internet and VSAT services. All public switched telephone network ("PSTN") services are offered on a resale basis. The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.–Bulgaria route, including the international transport and local access markets.
- Vodacom Lesotho (Pty) Limited, an affiliate of Verizon Wireless operating in Lesotho, provides traditional mobile services on 2G and 3G with a degree of capability to offer fixed and wireless services on other technologies, including wi-max and fiber. The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.–Lesotho route, including the international transport and local access markets.
- VM, S.A. is an affiliate operating in Mozambique. The company provides traditional mobile services on 2G and 3G with a degree of capability to offer fixed and wireless services on other technologies, including wi-max and fiber. VM, S.A. does not control bottleneck facilities or have a 50 percent or greater market share in the international transport and the local access markets in Mozambique.
- Verizon Romania SRL, an affiliate of Verizon Wireless operating in Romania, resells fixed voice services. The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.–Romania route, including the international transport and local access markets.
- Verizon Communications Slovakia s.r.o. operates in Slovakia. The company provides fixed voice, data (PIP) and Internet services. All PSTN services are offered on a resale basis. Verizon Communications Slovakia s.r.o. does not control bottleneck facilities or

Declaratory Ruling, 23 FCC Rcd 17444 (2008); *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00105, DA 09-1049 (May 14, 2009); *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00106, DA 10-1065 (June 14, 2010).

have a 50 percent or greater market share in the international transport and the local access markets in Slovakia.

- Vodacom Tanzania Limited is a Verizon Wireless affiliate operating in Tanzania. The company provides traditional mobile services on 2G and 3G with a degree of capability to offer fixed and wireless services on other technologies, including wi-max and fiber. Vodacom Tanzania Limited does not control bottleneck facilities or have a 50 percent or greater market share in the international transport and the local access markets in Tanzania.

ANSWER TO QUESTION 17 – Section 63.18(k):

Verizon Wireless agrees to be classified as dominant on the U.S.-Ghana route and to comply with the dominant carrier safeguards contained in Section 63.10 of the Commission's rules, 47 C.F.R. § 63.10.²

ANSWER TO QUESTION 18 - Section 63.18(k):

In accordance with Section 63.18(k)(1) of the Commission's rules, 47 C.F.R. § 63.18(k)(1), Verizon Wireless certifies that all of the countries listed in its response to Question 15 (therein referencing its response to Question 14) are WTO Member countries, with the exception of Russia.³ Verizon Wireless's foreign carrier affiliate in Russia, MCI (CIS) LLC, does not control bottleneck facilities or have a 50 percent or greater market share in the Russian international transport or local access markets. The Commission has previously found that this affiliate lacks market power in Russia.⁴

ANSWER TO QUESTION 20 - Section 63.18(p):

Pursuant to Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12, this application for partial assignment of international Section 214 authority qualifies for streamlined processing. As explained in response to Question 16 above, Verizon Wireless is non-dominant on all routes other than the U.S.-Ghana route. With respect to the U.S.-Ghana route, Verizon Wireless agrees to be classified as dominant and to comply with the dominant carrier safeguards contained in Section 63.10 of the Commission's rules, 47 C.F.R. § 63.10.

² See *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00106, DA 10-1065 (June 14, 2010).

³ See http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (last visited Feb. 9, 2012).

⁴ See *Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18433, ¶ 179 (2005).