BINGHAM

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September 11, 2012

Via IBFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Room TW-A325 Washington, DC 20554 Attn: International Bureau

Re: Notification Regarding Change in Corporate Form Resulting in *Pro Forma* Assignment of the International Section 214 Authorization of New Edge Network, Inc. d/b/a EarthLink Business

Dear Ms. Dortch:

EarthLink Business, LLC ("Assignee"), by undersigned counsel and pursuant to 47 C.F.R. § 63.24(f), notifies the Commission that it converted to a Delaware limited liability company from a Delaware corporation on August 27, 2012 resulting in the assignment of the International Section 214 Authorization of New Edge Network, Inc. d/b/a EarthLink Business ("Assignor") (Assignee and Assignor together, the "Company") to Assignee.¹

Information Required by Section 63.24(f)(2)

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

Sections 63.18(a): Name, address and telephone number of the Company:

EarthLink Business, LLC (Assignee) New Edge Network, Inc. d/b/a EarthLink Business (Assignor) 1375 Peachtree Street Atlanta, Georgia 30309 Tel: 404-815-0770

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

Bingham McCutchen LLP 2020 K Street NW Washington, DC 20006-1806

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¹ The Company notes that the conversion was completed by filing a certificate of conversion and did not entail a merger or other transaction that extinguished the existence of Assignor. As such, Assignee is the same entity as Assignor, except that (1) it is a limited liability company rather than a corporation and (2) its new name is EarthLink Business, LLC.

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Sections 63.18(b): Organization of the Company:

Assignor was a Delaware corporation prior to its conversion. As a result of the conversion, Assignee is a Delaware limited liability company

<u>Section 63.18(c)</u>: Correspondence concerning this filing should be sent to the Company's counsel:

Jean L. Kiddoo Brett P. Ferenchak Bingham McCutchen LLP 2020 K Street, N.W. Washington, DC 20006-1806 202-373-6000 (Tel) 202-373-6001 (Fax) jean.kiddoo@bingham.com brett.ferenchak@bingham.com

<u>Section 63.18(d)</u>: The Company holds an International 214 Authorization to provide global or limited global facilities-based and resale services granted in IB File No. ITC-214-20020514-00229.

Sections 63.18(h): See Attachment 1. for the ownership of the Company.

The Company certifies that the conversion was *pro forma* and that, together with all previous *pro forma* transactions,² did not result in a change in the actual controlling party of the Company.

* * * *

 $^{^2}$ EarthLink and certain of its subsidiaries are currently undergoing various *pro forma* intracompany changes. The Company will submit additional filings associated with those changes as may be required.

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This notification letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,

But P Ferenchate

Jean L. Kiddoo Brett P. Ferenchak

Counsel for the Company

A/75137002.2

ATTACHMENT 1

Answer to Question 11 - Section 63.18(h) Ownership Information

The following entities currently hold, directly or indirectly, a 10% or greater interest¹ in the Company (EarthLink Business, LLC) as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

Name:	New Edge Holding, LLC
Address:	1375 Peachtree Street
	Atlanta, Georgia 30309
Citizenship:	U.S.
Principal Business:	Holding Company
% Interest:	100% (directly in the Company)
Name:	EarthLink, Inc. ("EarthLink:)
Name: Address:	EarthLink, Inc. ("EarthLink:) 1375 Peachtree Street
1 (00110)	
1 (00110)	1375 Peachtree Street
Address:	1375 Peachtree Street Atlanta, Georgia 30309
Address: Citizenship:	1375 Peachtree Street Atlanta, Georgia 30309 U.S.

EarthLink is a widely held, publicly traded corporation. As a publicly held corporation,

the percentage of EarthLink's shares held by any person or entity at any given time may

fluctuate. To the best of EarthLink's knowledge, no person or entity directly or indirectly owns

or controls a ten percent (10%) or more equity interest in EarthLink.

Answer to Question 12 - Section 63.18(h) Interlocking Directorates

The Company does not have any interlocking directorates with a foreign carrier.

 $[\]frac{1}{1}$ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Answer to Question 13 - Description of Assignment

Assignor converted from a Delaware corporation to a Delaware limited liability company on August 27, 2012 resulting in the assignment of Assignor's International Section 214 Authorization to Assignee. The conversion was completed by filing a certificate of conversion and did not entail a merger or other transaction that extinguished the existence of Assignor. As such, Assignee is the same entity as Assignor, except that it is a limited liability company rather than a corporation and its name has changed to EarthLink Business, LLC.

VERIFICATION

COMMONWEALTH OF MASSACHUSETTS \$ \$ \$ \$ COUNTY OF MIDDLESEX

I, Paula Foley, state that I am Regulatory Affairs Counsel of EarthLink, Inc. and its subsidiaries in the foregoing filing (collectively, the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that matters set forth in the filing are true and correct to the best of my knowledge, information, and belief.

Paula Foley

Regulatory Affairs Counsel EarthLink, Inc.

SWORN TO AND SUBSCRIBED before me on the _____ day of September, 2012.

My commission expires: