

**ATTACHMENT 1**  
**FOR THE *PRO FORMA* ASSIGNMENT OF**  
**INTERNATIONAL SECTION 214 AUTHORIZATION**

This filing notifies the Commission pursuant to Section 63.24(f) of the Commission's rules<sup>1</sup> of the *pro forma* assignment of an international Section 214 authorization from and to subsidiaries controlled by Verizon Communications Inc. ("Verizon"). Specifically, as part of an internal reorganization, on August 29, 2012, Verizon Pennsylvania Inc., a wholly owned subsidiary of Verizon, merged into Verizon Pennsylvania Co., another wholly owned subsidiary of Verizon, with Verizon Pennsylvania Co. as the surviving company. Then, on August 31, 2012, Verizon Pennsylvania Co. was converted from a corporation into a limited liability company, becoming Verizon Pennsylvania LLC.<sup>2</sup>

**RESPONSE TO ITEMS ON IBFS ELECTRONIC FORM**

**Answer to Question 10**

***Section 63.18(c).***

For this *pro forma* assignment notification, Verizon Pennsylvania Inc. is the assignor and Verizon Pennsylvania LLC is the assignee. Contact information for both is provided below:

Company Contact:

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<sup>1</sup> See 47 C.F.R. § 63.24(f).

<sup>2</sup> Verizon contemporaneously is filing with the Commission a notification of the *pro forma* assignment of an local television transmission license, Call Sign KA2101, and a notification of consummation of the *pro forma* assignment of two private radio licenses, call signs KE4268 and KT4876. An application to assign the private radio licenses was filed with the Commission on August 21, 2012, and consented to on August 22, 2012. See ULS File No. 0005358591.

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***Section 63.18(d).***

Verizon Pennsylvania LLC holds the international Section 214 authorization that is the subject of this notification, File No. ITC-214-20080219-00073 (authority to provide global facilities-based service and global resale service).

**Answer to Question 11**

Verizon Pennsylvania LLC is a wholly owned subsidiary of Verizon, a Delaware corporation with its primary address at 140 West Street, New York, NY 10007. No persons or entities hold a direct or indirect 10 percent or greater interest in Verizon.

**Answer to Question 12**

Anthony Skiadas, who is the Controller of Verizon Pennsylvania, is also the Principal Director and President of Verizon Venezuela, S.A.

**Answer to Question 13**

As part of an internal reorganization, on August 29, 2012, Verizon Pennsylvania Inc., a wholly owned subsidiary of Verizon, merged into Verizon Pennsylvania Co., another wholly owned subsidiary of Verizon, with Verizon Pennsylvania Co. as the surviving company. On August 31, 2012, Verizon Pennsylvania Co. was converted from a corporation into a limited liability company, becoming Verizon Pennsylvania LLC. Following consummation of these transactions, Verizon Pennsylvania LLC holds the international Section 214 authorization at issue. This corporate restructuring did not change the ultimate ownership or control of the licenses. Accordingly, the transaction is deemed *pro forma* in nature.

This *pro forma* transaction is in the public interest. The ability to make non-substantial changes in corporate structure enhances the flexibility of Verizon's capital structure without any adverse effects on competition. Moreover, the Commission has previously stated that "[r]egulatory review of [*pro forma*] transactions yields no significant public interest benefits, but may delay or hinder transactions that could provide substantial financial, operational, or administrative benefits for carriers."<sup>3</sup>

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<sup>3</sup> 1998 Biennial Review – Review of International Common Carrier Regulations, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999).