

**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 of the *pro forma* assignment of an international Section 214 authorization from and to subsidiaries controlled by AT&T Inc. ("AT&T").<sup>1</sup> Specifically, on June 11, 2014, ATM Tide Acquisition Company LLC ("ATM Tide") was merged into New Cingular Wireless PCS, LLC ("New Cingular") and eliminated. New Cingular now holds all the licenses formerly held by ATM Tide.<sup>2</sup> New Cingular and ATM Tide were both indirect wholly owned subsidiaries of AT&T. Accordingly, the assignment was *pro forma* in nature.

**Answer to Question 10 – Section 63.18(c)-(d):**

The name, title, address and telephone for ATM Tide and New Cingular officer follows:

Michael P. Goggin  
AT&T Mobility LLC  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036  
Tel: (202) 457-2055  
Fax: (202) 457-3073  
michael.p.goggin@att.com

**International Section 214 Authority:**

ATM Tide held the international Section 214 authorization that is the subject of this *pro forma* assignment application, File No. ITC-214-20000707-00386 (authorization to provide global resale services).

New Cingular holds several global or limited global facilities-based or resale international Section 214 authorizations. ATM Tide and New Cingular's ultimate parent, AT&T, has numerous subsidiaries that collectively hold global or limited global facilities-based or resale Section 214 authorizations, including those for Cuba. These subsidiaries hold international Section 214 global authority to provide a range of facilities-based services, *see, e.g.*, ITC-214-19960830-00414 (Previous File Number ITC-96-487) (AT&T Corp. authority to provide global facilities-based services), including those originating in region and out of region, *see, e.g.*, ITC-214-20001130-00713 (SBC Long Distance, LLC authority to provide facilities-based and resale services originating in Kansas and Oklahoma); ITC-214-19971108-00689 (SBC

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

<sup>2</sup> Notification is being filed separately with the Wireless Telecommunications Bureau for the radio licenses impacted by the internal reorganization.

Long Distance, LLC authority to provide facilities-based services originating out of region). AT&T subsidiaries also have Section 214 global authority to provide various resale services. *See, e.g.*, ITC-214-19960223-00083 (SNET America, Inc. authority to resell private line services); ITC-214-19970814-00493 (Previous File Number ITC-97-506) (TC Systems, Inc. global authority to resell international switched services). Other AT&T subsidiaries hold authority to provide services on particular routes or over particular facilities. *See, e.g.*, ITC-89-060 (AT&T of Puerto Rico, Inc. and AT&T of the Virgin Islands, Inc. authority to operate additional capacity in St. Thomas-Tortola and Eastern Caribbean DCMS for use in providing services to various Caribbean points).

**Answer to Question 11 – Section 63.18(h):**

The name, address, citizenship, and principal business of each of New Cingular’s ten percent or greater interest holders are:<sup>3</sup>

***Direct Ownership of New Cingular Wireless PCS, LLC***

AT&T Mobility II LLC  
1025 Lenox Park Blvd. NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% percent of New Cingular Wireless PCS, LLC

***Indirect Ownership of New Cingular Wireless PCS, LLC***

AT&T Mobility II LLC  
1025 Lenox Park Blvd. NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% percent of New Cingular Wireless PCS, LLC

AT&T Mobility LLC  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Provision of Mobile Wireless Services  
Direct Ownership Interest: 54% of AT&T Mobility II LLC

AT&T Mobility Corporation  
1025 Lenox Park Blvd NE

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<sup>3</sup> The ownership interests provided herein are the actual direct ownership interests held in the next disclosed subsidiary in the vertical ownership chain rounded to the nearest one percent.

Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Management Company  
Direct Ownership Interest: manager of and controls AT&T Mobility LLC

AT&T Teleholdings, Inc.  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of SBC Telecom, Inc.

BellSouth Mobile Data, Inc.  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Georgia  
Principal Business: Holding Company  
Direct Ownership Interest: 40% of AT&T Mobility LLC, 100% of AT&T Mobility Corporation, 4% of AT&T Mobility II LLC, and 40% of AT&T NCWS Holdings Inc.

AT&T NCWS Holdings Inc.  
1025 Lenox Park Blvd. NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of New Cingular Wireless Services, Inc.

New Cingular Wireless Services, Inc.  
1025 Lenox Park Blvd.  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Provision of Mobile Wireless Services  
Direct Ownership Interest: 42% of AT&T Mobility II LLC

SBC Long Distance, LLC  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 50% of AT&T Mobility LLC

SBC Telecom, Inc.  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware

Direct Principal Business: Holding Company  
Direct Ownership Interest: 100% of SBC Long Distance, LLC, 60% of AT&T NCWS Holdings Inc., and 9% of AT&T Mobility LLC

AT&T Inc.  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of AT&T Teleholdings, Inc. and 100% of BellSouth Mobile Data, Inc.

AT&T is 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 AT&T.

**Answer to Question 12 – Section 63.18(h):**

The persons listed below are officers or directors of one or more of the following: New Cingular Wireless PCS, LLC, AT&T NCWS Holdings Inc., New Cingular Wireless Services, Inc., AT&T Mobility II LLC, AT&T Mobility LLC, AT&T Mobility Corporation, AT&T Teleholdings, Inc., SBC Long Distance, LLC, SBC Telecom, Inc., BellSouth Mobile Data, Inc., and AT&T Inc. and are also officers or directors of one or more of the following foreign carriers: BellSouth Long Distance, Inc., which is a carrier in Canada; AT&T Global Network Services International, Inc., which is a carrier in Israel, New Zealand, and Pakistan; AT&T Global Network Services Norge LLC, which is a carrier in Norway; AT&T Global Network Services Venezuela LLC, which is a carrier in Venezuela; and AT&T Japan LLC, which is a carrier in Japan.

Charles Bolton is President and Manager of SBC Long Distance, LLC, President and a Director of SBC Telecom, Inc., and President and Director of BellSouth Long Distance, Inc. George B. Goeke is Assistant Treasurer of AT&T Inc., Vice President and Assistant Treasurer of AT&T Teleholdings, Inc., and AT&T Mobility Corporation, and is also Vice President and Treasurer of BellSouth Long Distance, Inc., Director and Treasurer of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services Venezuela LLC, and Treasurer of AT&T Japan LLC. Elaine Lou is Assistant Treasurer of SBC Long Distance, LLC, SBC Telecom, Inc., BellSouth Long Distance, Inc., and is also Assistant Treasurer of AT&T Japan LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC. Jeston Dumas is Treasurer of SBC Long Distance, LLC and SBC Telecom, Inc. and Assistant Treasurer of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services Venezuela LLC and AT&T Japan LLC. Karen M. Diorio is Assistant Secretary of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC, and Director of Tax of SBC Long Distance, LLC, SBC Telecom, Inc., and AT&T Teleholdings, Inc. Teresa G. Blizzard is Assistant Secretary of AT&T Mobility

Corporation, BellSouth Mobile Data, Inc., New Cingular Wireless Services, Inc. and AT&T NCWS Holdings, Inc., Director-Taxes of AT&T Teleholdings, Inc., SBC Long Distance, LLC and SBC Telecom, Inc.; and Vice President – Taxes of BellSouth Long Distance, Inc. Lawrence J. Ruzicka is Senior Vice President – Tax of AT&T NCWS Holdings, Inc., AT&T Mobility Corporation, New Cingular Wireless Services, Inc., BellSouth Mobile Data, Inc., AT&T Inc. and Vice President – Tax of SBC Long Distance, LLC and SBC Telecom, Inc. and is also Director for AT&T Global Network Services, Norge, LLC, AT&T Global Network Services International, Inc., and AT&T Global Network Services Venezuela, LLC. Jeffrey M. Chambers is Assistant Secretary of AT&T NCWS Holdings, Inc., AT&T Mobility Corporation and New Cingular Wireless Services, Inc. and Assistant Vice President – Taxes of AT&T Global Network Services, Norge LLC, AT&T Global Network Services International, Inc., and AT&T Global Network Services Venezuela, LLC. Sherri L. Bazan is Assistant Treasurer of BellSouth Mobile Data, Inc., AT&T Teleholdings, Inc., AT&T Mobility Corporation, AT&T NCWS Holdings, Inc., New Cingular Wireless Services, Inc., and also BellSouth Long Distance, Inc.

### **Answer to Question 13**

This filing hereby notifies the Commission pursuant to Section 63.24(f) of its rules, 47 C.F.R. § 63.24(f), of the *pro forma* assignment of an international Section 214 authorization held by ATM Tide, an indirect wholly owned subsidiary of AT&T. On June 11, 2014, ATM Tide was merged into New Cingular and eliminated. New Cingular now holds all the licenses formerly held by ATM Tide.

This restructuring does not change the ultimate ownership or control of the international Section 214 authorization, as AT&T has continued to control it both before and after the restructuring. Accordingly, this assignment is *pro forma* in nature. 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>4</sup>

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<sup>4</sup> 1998 Biennial Review – Review of International Common Carrier Regulations, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999).