

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

This filing notifies the Commission pursuant to Section 63.24(f) of the Commission's rules of the *pro forma* assignment of several international Section 214 authorizations from and to subsidiaries controlled by Verizon Communications Inc. ("Verizon").¹ Specifically, on November 15, 2014, Verizon Enterprise Solutions LLC ("Verizon Enterprise") was merged into Verizon Long Distance LLC ("Verizon Long Distance") and eliminated. Verizon Long Distance now holds all of the authorizations formerly held by Verizon Enterprise. This restructuring does not change the ultimate ownership or control of the international 214 authorizations; Verizon continues to control the authorizations at issue. Accordingly, the assignment was *pro forma* in nature.

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

The name, title, address and telephone for an officer of, and additional contact point for, Verizon Long Distance:

Katharine R. Saunders
Verizon Communications Inc.
1320 North Courthouse Road
9th Floor
Arlington, VA 22201
Tel: 703-351-3097
katharine.saunders@verizon.com

with a copy to

Nancy J. Victory
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
Tel: 202-719-7344
Fax: 202-719-7049
nvictory@wileyrein.com

Verizon Enterprise Solutions, formerly a Delaware limited liability company, held the following international Section 214 authorizations that are the subject of this *pro forma* assignment application: ITC-214-19960223-00085 (individual switched retail services); ITC-214-19960911-00438 (limited global facilities-based services); ITC-214-19971223-00811 (limited global resale services); ITC-214-20001121-00681 (global or limited global facilities-based and resale

¹ See 47 C.F.R. § 63.24(f).

services); ITC-214-20010518-00308 (global or limited global facilities-based and resale services); ITC-214-20010713-00379 (global or limited global facilities-based and resale services); ITC-214-20011213-00632 (global or limited global facilities-based and resale services); ITC-214-20020117-00044 (global or limited global facilities-based and resale services); ITC-214-20020213-00081 (global or limited global facilities-based and resale services); ITC-214-20020402-00168 (global or limited global facilities-based and resale services); ITC-214-20020422-00211 (global or limited global facilities-based and resale services); ITC-214-20020705-00326 (global or limited global facilities-based and resale services); ITC-214-20020912-00465 (global or limited global facilities-based and resale services).

Verizon Long Distance, a Delaware limited liability company, already holds several international Section 214 authorizations: ITC-214-19960312-00107 (individual switched resale services); ITC-214-19960812-00377 (limited global facilities-based service); ITC-214-19971223-00813 (limited global facilities-based services); ITC-214-20001121-00680 (global or limited global facilities-based and resale services); ITC-214-20010518-00309 (global or limited global facilities-based and resale services); ITC-214-20010713-00380 (global or limited global facilities-based and resale services); ITC-214-20011213-00630 (global or limited global facilities-based and resale services); ITC-214-20020117-00045 (global or limited global facilities-based and resale services); ITC-214-20020213-00082 (global or limited global facilities-based and resale services); ITC-214-20020402-00170 (global or limited global facilities-based and resale services); ITC-214-20020422-00209 (global or limited global facilities-based and resale services); ITC-214-20020705-00327 (global or limited global facilities-based and resale services); ITC-214-20020912-00464 (global or limited global facilities-based and resale services).

Answer to Question 11 – Section 63.18(h):

Verizon Long Distance is a wholly-owned, direct subsidiary of Verizon New York Inc., a New York corporation with its primary address at 1300 I Street, NW, 400W, Washington, DC 20005. Verizon New York Inc. is a direct, wholly-owned subsidiary of NYNEX LLC. NYNEX LLC is a Delaware corporation with its primary address at 140 West Street, New York, NY 10007. NYNEX LLC is a direct, wholly-owned subsidiary of Verizon. Verizon is a Delaware corporation with its primary address at 1095 Avenue of the Americas, New York, NY 10036.

Verizon is a publicly traded corporation whose stock is widely held by the public with no person or entity known to own ten percent or more of the company's outstanding stock.

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 the international Section 214 authorizations held by Verizon Enterprise, an indirect wholly owned subsidiary of Verizon. On November 15, 2014, Verizon Enterprise was merged into Verizon Long Distance and eliminated. Verizon Long Distance now holds all the licenses formerly held by Verizon Enterprise.

This restructuring does not change the ultimate ownership or control of the international Section 214 authorizations, as Verizon has continued to control them 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.”²

² 1998 Biennial Review – Review of International Common Carrier Regulations, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999).