

**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 international Section 214 authorizations from and to subsidiaries controlled by AT&T Inc. ("AT&T").¹ Specifically, on January 1, 2016, Centennial Communications Corp. ("Centennial") merged into AT&T Corp. and was eliminated.² AT&T Corp. now holds the two international Section 214 authorizations formerly held by Centennial. All entities involved in the transaction are wholly owned subsidiaries of AT&T. The restructuring does not change the ultimate ownership or control of the international Section 214 authorizations; AT&T continues to control the authorizations at issue. Accordingly, the assignment was *pro forma* in nature.³

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

For this *pro forma* assignment filing, Centennial has been designated as the assignor, while AT&T Corp. has been designated the assignee.

The designated officers for the assignor and assignee are:

Natalie A. Webb
Assistant Secretary
Centennial Communications Corp.
208 S. Akard St.
Room 3028
Washington, DC 20036

James J.R. Talbot
Assistant Secretary
AT&T Corp.
1120 20th Street, NW
Suite 1000
Washington, DC 20036

¹ See 47 C.F.R. § 63.24(f).

² Shortly before, on December 29, 2015, AT&T Inc. contributed 100 percent of its direct interest in Centennial to AT&T Corp. This filing also notifies the Commission of that *pro forma* transfer of control. Please see the attached charts for a pictorial representation of the corporate structure of AT&T Corp.'s ownership, both before and after the reorganization.

³ See 47 C.F.R. § 63.24(d) note 2 (stating that *pro forma* transactions include "[a c]orporate reorganization that involves no substantial change in the beneficial ownership of the corporation . . . [and an a]ssignment or transfer from a corporation to a wholly owned direct or indirect subsidiary thereof or vice versa").

Correspondence concerning this notification should be sent to:

James J.R. Talbot
Assistant Secretary
AT&T Corp.
1120 20th Street, NW
Suite 1000
Washington, DC 20036
Telephone number: 202-457-3048

International Section 214 Authority:

AT&T Corp. now holds two international Section 214 authorizations that were formerly held by Centennial and that are the subject of this *pro forma* assignment application, File Nos. ITC-214-20000817-00545 (authorization to operate a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules) and ITC-214-19970923-00579 (authorization to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules).

AT&T Corp.'s ultimate parent, AT&T, has numerous subsidiaries that collectively hold global or limited global facilities-based or resale Section 214 authorizations. 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 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-214-20000713-00777 (Cingular Wireless of Texas RSA #16 Limited Partnership authority to resell international switched services originating from U.S. points and terminating at all international points, with the exception of the Dominican Republic and Venezuela). Other AT&T subsidiaries hold authority to provide services on particular routes or over particular facilities. *See, e.g.*, ITC-214-19890214-0005 (Previous File Number 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 AT&T Corp.'s ten percent or greater interest holder is:

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

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 following persons are officers or directors of AT&T Inc. and are also officers or directors of one or more foreign carriers:

George B. Goeke is Assistant Treasurer of AT&T Inc. and AT&T International, LLC; Vice President and Assistant Treasurer of AT&T Teleholdings, Inc. and AT&T Mobility Puerto Rico Inc.; Treasurer of SBC Telecom Inc.; Chief Financial Officer and Treasurer of AT&T Corp.; and Vice President and Treasurer of BellSouth Long Distance, Inc. Mr. Goeke is also Director and Treasurer of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC and Treasurer of AT&T Japan LLC. Richard G. Dennis is Vice President and Assistant Secretary of AT&T Corp. Mr. Dennis is also Vice President of AT&T Japan LLC and President and Secretary of AT&T Global Network Services Norge LLC, AT&T Global Network Services International Inc., and AT&T Global Network Services Venezuela LLC. Elaine Lou is Assistant Treasurer of SBC Telecom, Inc. and AT&T Corp.. Ms. Lou is also Assistant Treasurer of BellSouth Long Distance, Inc., 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. Karen M. Diorio is Director – Tax of AT&T International, LLC, AT&T Teleholdings, Inc., AT&T Corp., and SBC Telecom Inc.. Ms. Diorio is also 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. Teresa G. Blizzard is Director – Tax of AT&T Teleholdings, Inc., SBC Telecom, Inc., AT&T Corp., and AT&T International, LLC and is Assistant Secretary of AT&T Mobility Puerto Rico Inc., AT&T Mobility USVI Inc., and Beach Holding Corporation. Ms. Blizzard is also Vice President – Taxes of BellSouth Long Distance, Inc. Lawrence J. Ruzicka is Senior Vice President – Tax of AT&T Inc., AT&T Corp., and AT&T International, LLC; Vice President – Tax of SBC Telecom, Inc.; and Senior Vice President of AT&T Mobility Puerto Rico Inc., AT&T Mobility USVI Inc., and Beach Holding Corporation. Mr. Ruzicka 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 Mobility Puerto Rico Inc. and Director – Tax for AT&T Corp. Mr. Chambers is also 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 AT&T Teleholdings, Inc., SBC Telecom, Inc., AT&T Mobility Puerto Rico Inc., AT&T Mobility USVI Inc., AT&T Corp., and Beach Holding Corporation. Ms. Bazan is also Assistant Treasurer of BellSouth Long Distance, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, and AT&T Japan LLC. Thomas F. Brown is Assistant Secretary of AT&T Mobility Puerto Rico Inc., AT&T Mobility USVI Inc., and Beach Holding Corporation. Mr. Brown is also Assistant Secretary of AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, AT&T Japan LLC, and AT&T Global Network Services Norge LLC. Steven Shashack is Assistant Secretary of AT&T

Mobility Puerto Rico Inc. and Assistant Vice President – Tax of AT&T Corp. and SBC Telecom Inc. Mr. Shashack is also AT&T Global Network Services Norge LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, and AT&T Japan LLC. Stacy W. Roth is Assistant Treasurer of SBC Telecom, Inc., AT&T Teleholdings, Inc., AT&T International, LLC, AT&T Corp., and AT&T Mobility Puerto Rico Inc. Ms. Roth is also Assistant Treasurer of BellSouth Long Distance, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, and AT&T Japan LLC.

Answer to Question 13

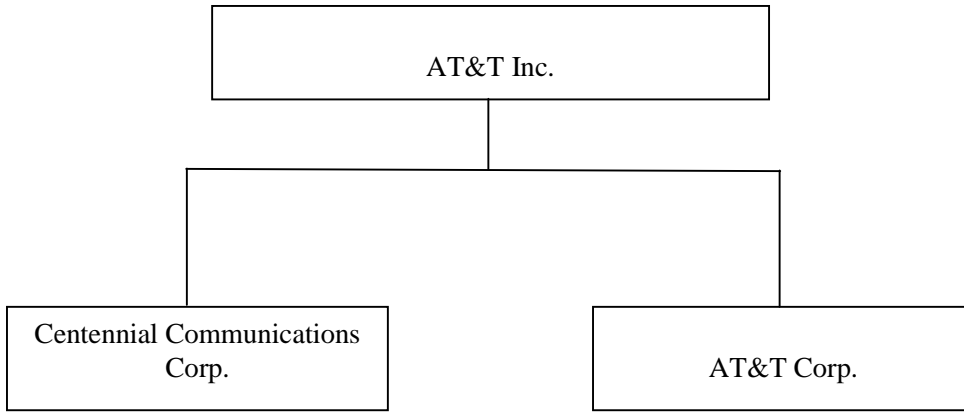
This filing hereby notifies the Commission pursuant to Section 63.24(f) of its rules, 47 C.F.R. § 63.24(f), of the *pro forma* assignment of the international Section 214 authorizations held by Centennial, an indirect wholly owned subsidiary of AT&T. On December 29, 2015, AT&T transferred its 100 percent direct interest in Centennial to AT&T Corp. Then, on January 1, 2016, Centennial was merged into AT&T Corp. and was eliminated. AT&T Corp. now holds the international Section 214 authorizations that are the subject of this notification.

This restructuring does not change the ultimate ownership or control of the international Section 214 authorizations, 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.”⁴ Therefore, “grant of the application is deemed presumptively in the public interest.”⁵

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

⁵ *In re Fed. Communications Bar Ass’n’s Petition for Forbearance from Section 310(d) of the Communications Act Regarding Non-Substantial Assignments of Wireless Licenses & Transfers of Control Involving Telecomms. Carriers*, Memorandum Opinion and Order, 13 FCC Rcd. 6293, 6295, ¶ 2 (1998).

Pre-Reorganization



Post-Reorganization

