

## ATTACHMENT 1

### NOTIFICATION OF *PRO FORMA* TRANSACTION

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 64.24(f) of the Commission's rules,<sup>1</sup> Verizon Communications Inc. ("Verizon") notifies the Commission of an internal restructuring involving certain indirect subsidiaries of Verizon that occurred on September 30, 2019.<sup>2</sup> Specifically, the restructuring resulted in the *pro forma* assignment of the international Section 214 authorization ("Section 214 Authorization") held by Bell Atlantic Mobile Systems of Allentown, Inc. ("BAM Allentown") to Bell Atlantic Mobile Systems LLC ("BAM Systems").

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

All communications in connection with this notification should be directed to the following:

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Verizon, a Delaware corporation, does not hold any international Section 214 authorizations but does directly or indirectly control subsidiaries that hold such authorizations to provide international switched resale services and global or limited global facilities-based and resale services.

BAM Allentown held, and BAM Systems now holds, the Section 214 Authorization that is the subject of this notification (File No. ITC-214-19960509-00185). BAM Systems holds no other international Section 214 authorizations.

#### **Answer to Question 11 (Section 63.18(h))**

Verizon is a publicly traded and widely held company, and no person or entity holds a direct or indirect 10 percent or greater ownership interest in Verizon. Verizon's address is One Verizon Way, Basking Ridge, New Jersey 07920. Verizon's principal business is the provision of communications services.

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<sup>1</sup> 47 U.S.C. § 214; 47 C.F.R. § 64.24(f).

<sup>2</sup> Notifications also are being filed concurrently with the Wireless Telecommunications Bureau with regard to the wireless licenses impacted by the internal reorganization.

### Answer to Question 13

Verizon effectuated an internal restructuring involving certain indirect subsidiaries of Verizon on September 30, 2019. As part of the restructuring, BAM Allentown, a direct wholly-owned subsidiary of BAM Systems, merged into BAM Systems and the Section 214 Authorization was assigned on a *pro forma* basis from BAM Allentown to BAM Systems. Pre- and post-closing ownership charts are included as Attachment 2.<sup>3</sup>

Because the internal restructuring did not change the ultimate control of the Section 214 Authorization – Verizon continues to control the Section 214 Authorization post-closing – the transaction described above was *pro forma* in nature.<sup>4</sup> The FCC has stated that, in situations “where no substantial change of control will result from the transfer or assignment, grant of the application is deemed presumptively in the public interest.”<sup>5</sup>

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<sup>3</sup> The licensees and authorizations referenced in this notification are intended to be complete and include all licensees and authorizations affected by the internal reorganization. Verizon, however, requests that FCC acceptance of the *pro forma* notification include any licensees and authorizations that may have been inadvertently omitted.

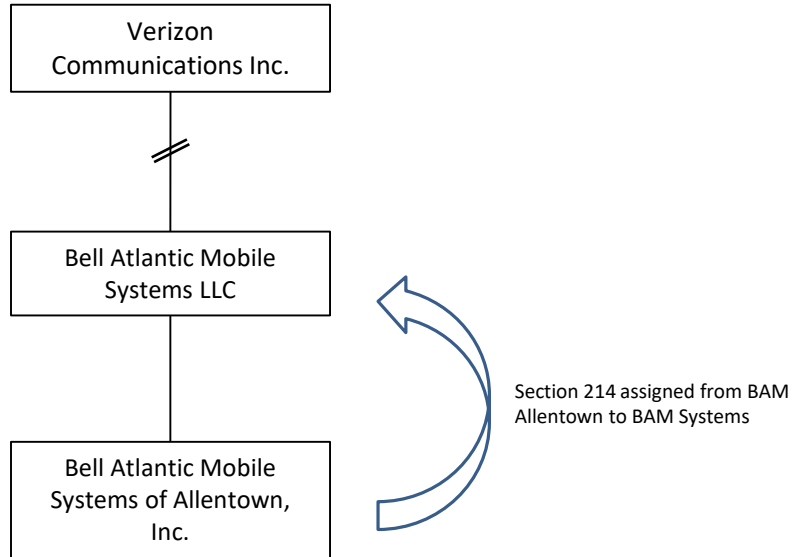
<sup>4</sup> *Communications Bar Ass’n’s Petition for Forbearance from Section 310(d) of the Communications Act Regarding Non-Substantial Assignments of Wireless Licenses & Transfers of Control Involving Telecomms. Carriers*, Memorandum Opinion and Order, 13 FCC Rcd. 6293, 6299, ¶ 8 (1998) (concluding that a “corporate reorganization which involves no substantial change in the beneficial ownership of the corporation” is *pro forma* in nature).

<sup>5</sup> *Id.* at 6295, ¶ 2. *See also 1998 Biennial Review – Review of International Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999) (finding 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.”).

**ATTACHMENT 2**

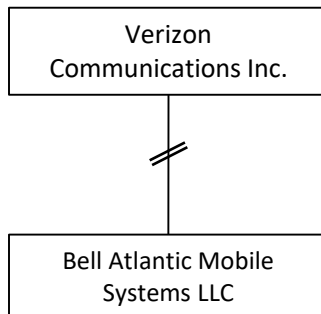
**PRE- AND POST-CLOSING ORGANIZATIONAL CHARTS**

Pre-Restructuring  
Ownership (*simplified*)



All interests are 100%.

Post-Restructuring  
Ownership (*simplified*)



All interests are 100%.