

**Attachment 1 to Notice of *Pro Forma* Assignment of
Radianz Americas Inc. to BT Americas Inc.**

Answer to Question 10

Response to 47 C.F.R. § 63.18(c):

(c) The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed:

For Assignor and Assignee:

Ruth E. Holder
Regulatory Affairs Manager
BT Americas Holdings Inc.
11440 Commerce Park Drive, Suite 100
Reston, VA 20191
Telephone: 703-755-6733
Email: ruth.holder@bt.com

With a copy to:

A. Sheba Chacko
Chief Regulatory Counsel, Americas
BT Americas Holdings Inc.
11440 Commerce Park Drive, Suite 100
Reston, VA 20191
Telephone: 703-755-6730
Email: sheba.chacko@bt.com

Response to 47 C.F.R. § 63.18(d):

(d) A statement as to whether the applicant has previously received authority under Section 214 of the Act and, if so, a general description of the categories of facilities and services authorized (i.e., authorized to provide international switched services on a facilities basis):

Assignee: BT Americas Inc., formerly known as BT North America Inc. (“BTA” or “Assignee”), previously received international Section 214 authority (*see, e.g.*, DA 94-1257; File No. I-T-C-93-126). BTA’s international Section 214 authorizations were subsequently assigned to its parent, BT Americas Holdings Inc. (“BTAH” or “Licensee”). As a wholly owned subsidiary of BTAH, BTA operates under the international Section 214 authorizations held by BTAH as necessary. BTA and BTAH are Delaware corporations.

Assignor: Radianz Americas Inc. (“Assignor”) had not previously received authority under its own name, but was wholly owned by BTAH and operated under the international Section 214 authorizations held by BTAH as necessary.

Note that Licensee BT Americas Holdings Inc. will continue to hold all of its international Section 214 authorizations in its own name.

Answer to Question 11

The following entities directly or indirectly own ten percent or more of the equity of Assignee BTA:

BT United States L.L.C., a limited liability company organized under the laws of the state of Delaware, with offices at 8951 Cypress Waters Blvd., Suite 200, Dallas, TX 75019, whose principal business is Holding Company, directly holds 100% of the equity of BTA.

BT Fifty-Three Limited, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Holding Company, directly holds 100% of the equity of BT United States L.L.C., and therefore indirectly holds 100% of the equity of BTA.

BT Americas Holdings Inc., a Delaware corporation with offices at 8951 Cypress Waters Blvd., Suite 200, Dallas, TX 75019, whose principal business is Holding Company, directly holds 100% of the equity of BT Fifty-Three Limited, and therefore indirectly holds 100% of the equity of BTA.

BT Fifty-One, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Finance, directly holds 100% of the equity of BT Americas Holdings Inc., and therefore indirectly holds 100% of the equity of BTA.

BT (International) Holdings Limited, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Holding Company, directly holds 76% of the equity of BT Fifty-One, and therefore indirectly holds 76% of the equity of BTA.

BT Holdings Limited, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Holding Company, directly holds 24% of BT Fifty-One, and directly holds 100% of the equity of BT (International) Holdings Limited, and therefore indirectly holds 100% of the equity of BTA.

British Telecommunications plc, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Communications, directly holds 100% of the equity of BT Holdings Limited, and therefore indirectly holds 100% of the equity of BTA.

BT Group Investments Limited, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Holding Company, directly holds 100% of the equity of British Telecommunications plc, and therefore indirectly holds 100% of the equity of BTA.

BT Group plc, a company organized under the laws of England and Wales, with a registered office address at One Braham Street, London, E1 8EE, whose principal business is Communications, directly holds 100% of the equity of BT Group Investments Limited, and therefore indirectly holds 100% of the equity of BTA.

Deutsche Telekom AG, a company organized under the laws of Germany, with an address at Friedrich-Ebert-Allee 140, 53113 Bonn, whose principal business is Communications, indirectly holds 12.06% of BT Group plc through its subsidiary DB London (Investor Services) Nominees Limited A/C TMOB as nominee for T-Mobile Holdings Limited, a company indirectly controlled by Deutsche Telekom AG, and therefore indirectly holds 12.06% of BTA.

Altice UK S.à.r.l., a company organized under the laws of Luxembourg, with an address at 5 rue Eugène Ruppert, Luxembourg, L-2453, Grand-Duchy of Luxembourg, whose principal business is Communications, holds 18.0% of the equity of BT Group plc, and therefore indirectly holds 18.0% of BTA.

There are no other individuals or entities that hold ten percent or more of the equity in BTA.

Answer to Question 12

Assignee has interlocking directorates with foreign carriers as listed on Exhibit A hereto.

Answer to Question 13

Assignor, a wholly owned subsidiary of BTAH, was merged into and subsumed by Assignee BTA, also a wholly owned subsidiary of BTAH, effective January 1, 2022. Assignor's assets and customers in the United States were therefore assigned to Assignee in this *pro forma* transaction,¹ and Assignee is successor-in-interest to Assignor. This *pro forma* merger was part of a corporate reorganization designed to simplify the overall organizational structure of various BT entities in the United States.

BTAH will retain all of its international Section 214 authorizations in its own name. This notice is provided to inform the Commission of the assignment of assets resulting from this *pro forma* merger. Note that the licensee name on all of BTAH's international Section 214 authorizations will remain the same.

¹ See Letter to Marlene H. Dortch, Federal Communications Commission, from Ruth E. Holder, BT Americas Inc., WC Docket No. 00-257 (December 1, 2021) (providing notice to customers pursuant to 47 C.F.R. § 64.1120(e)).

The IBFS File Numbers for all international Section 214 authorizations held by BTAH that will continue to be held by BTAH are:

ITC-214-20020306-00105
ITC-214-19990609-00340
ITC-214-19981019-00794
ITC-214-19971216-00792
ITC-214-19971125-00739
ITC-214-19960909-00433
ITC-214-19960802-00365
ITC-214-19960802-00363
ITC-214-19930308-00039

This assignment is *pro forma* in nature as both Assignor and Assignee were commonly and wholly owned by BTAH. Ultimate control and ownership of the authorizations and assets at issue did not change.

Exhibit A to Attachment 1
Directors and Officers of BT Americas Inc. and
Interlocking Directorates with Foreign Carriers

The following individuals are officers and/or directors of Assignee BTA:

Michael Wolkowicz, Director and President
 Bijal Shah, Director and Chief Operating Officer
 Laura Galvin, Director
 Jamie Paul Newell, Secretary
 Stephane Patrice Jean Calvary, Treasurer
 Rustum Rau, Chief Legal Officer
 Lynn Morzorati Metz, Vice President of Tax
 Andrew Schmitt, Tax Officer

Andrew Schmitt is also Tax Officer of BT Canada Inc.

Lynn Morzorati Metz is also a director and/or officer of the following foreign carriers:

Name of Company	Country	Position Held
BT Canada Inc.	Canada	Vice President of Tax
BT Colombia Limitada	Colombia	Alternate Director

Jamie Paul Newell is also a director and/or officer of the following foreign carriers:

Name of Company	Country	Position Held
BT Argentina S.R.L.	Argentina	Alternate Director
BT Bulgaria EOOD	Bulgaria	Director
BT Canada Inc.	Canada	Secretary
BT Colombia Limitada	Colombia	Alternate Director
BT de Panama, S.R.L.	Panama	Director
BT Dominican Republic, S.A.	Dominican Republic	Director and Chairman
BT El Salvador, Limitada de Capital Variable	El Salvador	Director
BT Global Costa Rica SRL	Costa Rica	Director
BT Guatemala S.A.	Guatemala	Director and Secretary
BT LatAm Dominicana, S.A.	Dominican Republic	Director and Secretary
BT Nicaragua S.A.	Nicaragua	Director and Secretary
BT Peru S.R.L.	Peru	Director and Secretary
BT Sociedad De Responsabilidad Limitada	Honduras	Director
Servicios de Telecomunicaciones BT Global Networks Chile Limitada	Chile	Director

Stephane Patrice Jean Calvary is also a director and/or officer of the following foreign carriers:

Name of Company	Country	Position Held
BT Canada Inc.	Canada	Director and Treasurer
BT de Panama, S.R.L.	Panama	Director
BT Dominican Republic, S.A.	Dominican Republic	Director and Secretary
BT El Salvador, Limitada de Capital Variable	El Salvador	Director
BT Global Costa Rica SRL	Costa Rica	Director
BT Guatemala S.A.	Guatemala	Director
BT LatAm Dominicana, S.A.	Dominican Republic	Director
BT LatAm México, S.A. de C.V.	Mexico	Director
BT Nicaragua S.A.	Nicaragua	Director and Vice President
BT Sociedad De Responsabilidad Limitada	Honduras	Director