

**Attachment 1 to Notice of *Pro Forma* Assignment of International Section 214  
Authorization from BT LatAm Inc. to BT Americas Holdings 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:

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

With a copy to:

Ruth E. Holder  
Regulatory Affairs & Compliance Manager  
BT Americas Holdings Inc.  
11440 Commerce Park Drive, Suite 100  
Reston, VA 20191  
Telephone: 703-755-6730  
Email: ruth.holder@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 Holdings Inc. (“Assignee”) has not previously received Section 214 authority from the Federal Communications Commission, although several of its subsidiaries have held such authority. BT Americas Holdings Inc. is a Delaware corporation and the ultimate U.S. holding company for all BT entities in the United States. Assignor is indirectly and wholly owned by Assignee.

Assignor: BT LatAm Inc., formerly named Comsat International, Inc.<sup>1</sup> (“Assignor”), has previously received authority under 47 U.S.C. § 214 for Global or Limited Global Facilities-based and Resale Service authority. That authorization is the subject of this notice of *pro forma* assignment to BT Americas Holdings Inc., and is identified by the FCC IBFS File No. ITC-214-20020306-00105.

### **Answer to Question 11**

The following entities directly or indirectly own ten percent or more of the equity of Assignee BT Americas Holdings Inc.:

BT Fifty-One, a company organized under the laws of England and Wales, with a registered office address at 81 Newgate Street, London, EC1A 7AJ, whose principal business is Finance, directly holds 100 percent of BT Americas Holdings Inc.

BT (International) Holdings Limited, a company organized under the laws of England and Wales, with a registered office address at 81 Newgate Street, London, EC1A 7AJ, whose principal business is Holding Company, directly holds 76 percent of BT Fifty-One, and therefore indirectly holds 76 percent of BT Americas Holdings Inc.

BT Holdings Limited, a company organized under the laws of England and Wales, with a registered office address at 81 Newgate Street, London, EC1A 7AJ, whose principal business is Holding Company, directly holds 24 percent of BT Fifty-One, and directly holds 100 percent of BT (International) Holdings Limited, and therefore indirectly holds 100 percent of BT Americas Holdings Inc.

British Telecommunications plc, a company organized under the laws of England and Wales, with a registered office address at 81 Newgate Street, London, EC1A 7AJ, whose principal business is Communications, directly holds 100 percent of BT Holdings Limited, and therefore indirectly holds 100 percent of BT Americas Holdings Inc.

BT Group Investments Limited, a company organized under the laws of England and Wales, with a registered office address at 81 Newgate Street, London, EC1A 7AJ, whose principal business is Holding Company, directly holds 100 percent of British Telecommunications plc, and therefore indirectly holds 100 percent of BT Americas Holdings Inc.

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<sup>1</sup> See FCC IBFS File No. ITC-T/C-20070425-00162 and Public Notice DA 07-2263 for approval of the transfer of control of Comsat International, Inc. to BT. Following the consummation of that transaction in 2008, Comsat International, Inc. changed its name to BT LatAm Inc. Although notice of the name change was made in other contexts (such as the FCC’s CORES and Form 499 Filer Databases) and is presumed to have been timely filed with the International Bureau, given intervening staff changes, a date-stamped copy has not been located. If necessary, Applicants respectfully request a waiver of 47 C.F.R. § 63.21(i) to provide for late notice of the name change. See 47 C.F.R. § 1.3; see also *Numbering Resource Optimization*, Order, 18 FCC Rcd 16860, ¶ 9 (2003) (“The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.”).

BT Group plc, a company organized under the laws of England and Wales, with a registered office address at 81 Newgate Street, London, EC1A 7AJ, whose principal business is Communications, directly holds 100 percent of BT Group Investments Limited, and therefore indirectly holds 100 percent of BT Americas Holdings Inc.

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, directly holds 12.05 percent of BT Group plc, and therefore indirectly holds 12.05 percent of BT Americas Holdings Inc.

There are no other individuals or entities that hold ten percent or more of the equity in BT Americas Holdings Inc.

**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 Assignee, assigned its international section 214 authorization to Assignee effective December 31, 2018, as part of a corporate reorganization designed to streamline the holdings of various BT entities in the United States. Assignee, as the top level United States holding company, serves as an umbrella organization under which various BT United States companies operate, and certain other BT entities also assigned their international section 214 authorizations to Assignee as of December 31, 2018.<sup>2</sup> Assignor does not desire to retain its authorization.

This assignment is *pro forma* in nature as ultimate control and ownership of the authorization at issue did not change. With this *pro forma* assignment, the following BT entities, wholly owned by Assignee, are operating under the international section 214 authorizations held by their parent, Assignee BT Americas Holdings Inc., pursuant to 47 C.F.R. § 63.21(h), as necessary:

BT Americas Inc.  
BT Conferencing Video Inc.  
BT Communications Sales LLC  
BT Federal Inc.  
BT LatAm Inc.  
BT Procure LLC  
Infonet Services Corporation  
Radianz Americas Inc.

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<sup>2</sup> See Notices of *Pro Forma* Assignment filed concurrently herewith by BT Fifty-Three Limited and Infonet Services Corporation.

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

The following individuals are officers and/or directors of Assignee BT Americas Holdings Inc.:

Jennifer Artley, Director, President and Chair  
Tammie Briscoe, Director  
Andrew McGroarty, Director and CFO  
Richard E. Nohe, Director and Chief Legal Officer  
Jamie Paul Newell, Secretary  
Stephane Patrice Jean Calvary, Treasurer  
Lynn Morzorati Metz, Vice President of Tax  
Andrew Schmitt, Tax Officer

Richard Nohe is also Chief Legal Officer of BT Canada Inc.

Andrew Schmitt is also Tax Officer of BT Canada Inc.

Andrew McGroarty is also a director and/or officer of the following foreign carriers:

<b>Name of Company</b>	<b>Country</b>	<b>Position Held</b>
BT Canada Inc.	Canada	Director and Chief Financial Officer
BT LatAm México, S.A. de C.V.	Mexico	Director

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

<b>Name of Company</b>	<b>Country</b>	<b>Position Held</b>
BT Argentina S.R.L.	Argentina	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 Argentina S.A.	Argentina	Alternate Director
BT LatAm Colombia S.A.	Colombia	Alternate Director
BT LatAm Costa Rica, S.A.	Costa Rica	Director
BT LatAm Dominicana, S.A.	Dominican Republic	Director and Secretary
BT LatAm El Salvador, S.A. de CV	El Salvador	Director and Assistant Vice President

BT LatAm Guatemala, S.A.	Guatemala	Director and Secretary
BT LatAm Honduras, S.A.	Honduras	Alternate Director
BT LatAm Nicaragua, S.A.	Nicaragua	Director and Secretary
BT LatAm Panama, Inc.	Panama	Director
BT LatAm Peru S.A.C.	Peru	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:

<b>Name of Company</b>	<b>Country</b>	<b>Position Held</b>
BT Canada Inc.	Canada	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 Costa Rica, S.A.	Costa Rica	Director
BT LatAm Dominicana, S.A.	Dominican Republic	Director
BT LatAm Guatemala, S.A.	Guatemala	Director
BT LatAm Honduras, S.A.	Honduras	Director and Vice President
BT LatAm México, S.A. de C.V.	Mexico	Director
BT LatAm Nicaragua, S.A.	Nicaragua	Director and Vice President
BT LatAm Panama, Inc.	Panama	Director
BT Nicaragua S.A.	Nicaragua	Director and Vice President
BT Sociedad De Responsabilidad Limitada	Honduras	Director

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

<b>Name of Company</b>	<b>Country</b>	<b>Position Held</b>
BT Canada Inc.	Canada	Vice President of Tax
BT Colombia Limitada	Colombia	Alternate Director
BT LatAm El Salvador, S.A. de C.V.	El Salvador	Director and Assistant Treasurer