

## ATTACHMENT 1

### NOTIFICATION OF *PRO FORMA* TRANSACTIONS

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 *pro forma* assignment of two authorizations between certain existing indirect subsidiaries of Verizon that occurred on April 15, 2021. These non-substantive internal *pro forma* assignments did not alter Verizon's indirect control of such authorizations.

#### **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. The international Section 214 authorizations that were impacted by the internal assignment are listed in Attachment 2.

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

Both the assignor and assignee in this case are wholly-owned subsidiaries of Verizon. 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).

### Answer to Question 13

Verizon effectuated an internal *pro forma* assignment of two authorizations from one wholly-owned Verizon subsidiary to two separate, wholly-owned Verizon subsidiaries. Specifically, the following *pro forma* transactions took place on April 15, 2021:

1. Cellco Partnership (“Cellco”) assigned one of its international 214 authorizations to Verizon Long Distance LLC.
2. Cellco assigned another of its international 214 authorizations to Verizon Select Services Inc.

Attachment 3 includes a chart showing the ownership of the affected FCC licensees.

Because the internal assignments did not change the ultimate control of any licensee or authorization – Verizon continues to control all of these licensees and authorizations post-closing – the transactions described above were *pro forma* in nature.<sup>2</sup> The Commission 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>3</sup>

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<sup>2</sup> *Communications Bar Ass’ns 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>3</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

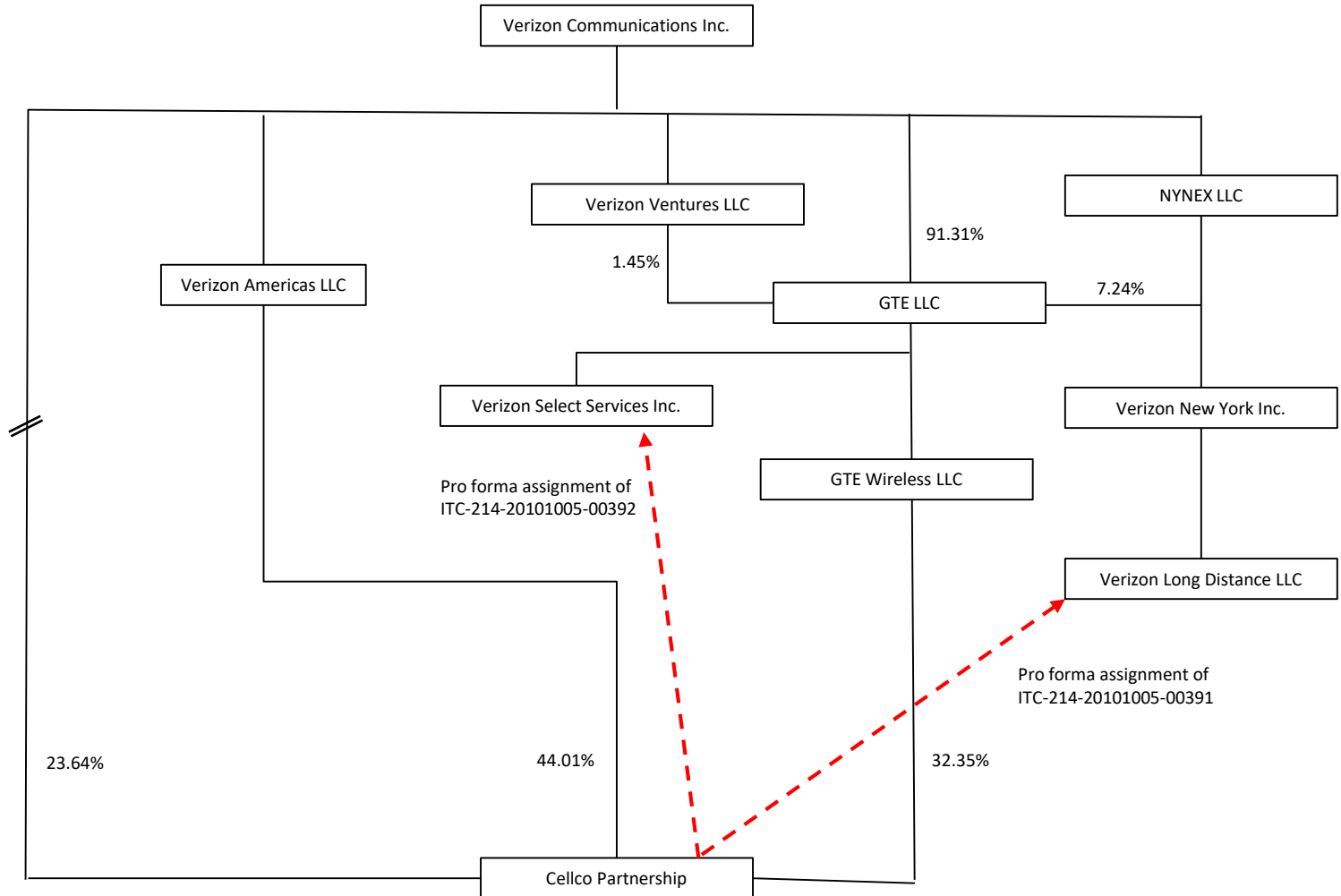
### INTERNATIONAL SECTION 214 AUTHORIZATIONS AFFECTED BY THE *PRO FORMA* TRANSACTIONS

The following international Section 214 authorizations were assigned on a *pro forma* basis:

<b>Assignor</b>	<b>Assignee</b>	<b>Section 214 Authorization</b>
Cellco Partnership	Verizon Long Distance LLC	ITC-214-20101005-00391
Cellco Partnership	Verizon Select Services Inc.	ITC-214-20101005-00392

**ATTACHMENT 3**  
**OWNERSHIP CHART**

# Ownership (simplified)



All interests are 100% unless otherwise noted.