



market power in Venezuela.<sup>2</sup> On February 12, 2007, Verizon agreed with the Bolivarian Republic of Venezuela that, subject to certain conditions, it would sell its interest in CANTV to the Republic by participating in tender offers to be conducted by the Republic in the United States and Venezuela.<sup>3</sup> Verizon tendered its entire interest in CANTV prior to the conclusion of those tender offers on May 8, 2007. The Bolivarian Republic of Venezuela assumed operational control of CANTV on May 21, 2007.<sup>4</sup> As of that date, Verizon has no equity interest in or control over CANTV.

Section 63.10(a)(1) of the rules provides that “[a] U.S. carrier that has no affiliation with, and that itself is not, a foreign carrier in a particular country to which it provides service (*i.e.*, a destination country) shall presumptively be considered non-dominant for the provision of international communications services on that route.”<sup>5</sup> As a result of the sale of CANTV, the Verizon International FCC Licensees are no longer affiliated with a foreign carrier on the U.S.-Venezuela route. Therefore, the Verizon International FCC Licensees are presumptively entitled to non-dominant status on the U.S.-Venezuela route, and thus request that the Commission modify their regulatory status on this route from dominant to non-dominant.

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<sup>2</sup> Public Notice, “The International Bureau Revises and Reissues the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets,” DA 04-1584 (May 28, 2004), available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DA-04-1584A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-04-1584A1.pdf).

<sup>3</sup> See News Release, “Venezuelan Government and Verizon Agree to Telecom Nationalization” (Feb. 13, 2007), available at <http://www.venezuelanalysis.com/news.php?newsno=2218>.

<sup>4</sup> See News Release, “Venezuela completes control of CANTV” (May 21, 2007), available at <http://www.msnbc.msn.com/id/18786438/>.

<sup>5</sup> 47 C.F.R. § 63.13(a)(1).

Respectfully submitted,

VERIZON

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## Attachment A<sup>6</sup>

Verizon Subsidiaries Holding International Section 214 authorizations and/or submarine cable licenses:

- Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance
- NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions
- Verizon Hawaii International Inc.
- Verizon Select Services Inc.
- Verizon Airfone Inc. (f/k/a GTE Airfone Incorporated)
- MCI, LLC (f/k/a MCI, Inc.)
- MCI Communications Corporation
- MCI International, Inc.
- MCI Communications Services, Inc. (f/k/a MCI WorldCom Communications, Inc.)
- MCI International Services, Inc. (f/k/a MCI WorldCom International, Inc.)
- MCI Communications Services, Inc (f/k/a MCI WorldCom Network Services, Inc./ MCI Network Services, Inc.)
- MFS Globenet, Inc.

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<sup>6</sup> The Commission classified the current international carrier subsidiaries and affiliates of Verizon as dominant on the U.S.-Venezuela route, except to the extent that they provide service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services pursuant to Section 63.10(a)(4) of the Commission's rules, in the following orders: *GTE Telecom Incorporated; Application for Authority Pursuant to Section 214 of the Communications Act to provide International Switched Resale, Facilities-Based Switched, Private Line Voice and Data Services and Resold Non-interconnected Private Lines to Venezuela and the Dominican Republic; GTE Mobilnet Incorporated, on Behalf of Itself and Certain of its Corporate Affiliates; Application for Authorization Pursuant to Section 214 of the Communications to Operate as an International Resale Carrier for International Switched Voice Services to the Dominican Republic and Venezuela, Order Authorization, and Certificate, 13 FCC Rcd 4378 (1998) (¶ 46); GTE Corporation, Transferor and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License, Memorandum Opinion and Order, 15 FCC Rcd 14032 (2000) (¶ 422); Verizon Communications Inc. and MCI, Inc., Applications for Approval of Transfer of Control, Memorandum Opinion and Order, FCC 05-184 (2005) (¶ 225).*