

STAMP AND RETURN

EDGE WIRELESS HOLDING COMPANY, LLC
650 SW Columbia, Suite 7200
Bend, OR 97702

NEW CINGULAR WIRELESS PCS, LLC
5601 Legacy Drive, MS-A3
Plano, TX 75024

January 18, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

FILED/ACCEPTED

JAN 18 2008

Federal Communications Commission
Office of the Secretary

Attn: David Krech, Policy Division
International Bureau

Re: *Section 1.65 Update to Application to Transfer Control of Edge Wireless, LLC, a Section 214-Authorized International Carrier, from Edge Wireless Holding Company, LLC, Transferor, to New Cingular Wireless PCS, LLC, Transferee*
File No. ITC-T/C-20071214-00505

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, Edge Wireless Holding Company, LLC ("Edge Holding") (FRN 0007696719) and New Cingular Wireless PCS, LLC ("NCW PCS") (FRN 0003291192), an indirect wholly-owned subsidiary of AT&T Inc. (collectively, the "Applicants") hereby update their application seeking Commission consent to transfer control of Section 214-authorized international carrier, Edge Wireless, LLC (FRN 0003800679), to NCW PCS. While the Commission granted the transfer of control application on January 4, 2008, the proposed transfer of control has not yet been consummated by the parties.¹ The Applicants are taking this opportunity to update the information contained in the application to ensure the accuracy of the filing. None of the updated information being provided in the attachment is of decisional significance to the underlying decision.

As shown in redline in the Updated Attachment 1 attached hereto, the ownership information for NCW PCS has been updated to reflect an internal reorganization within AT&T that occurred on December 31, 2007. The reorganization resulted in minor *pro forma* changes to the intermediate ownership structure of the transferee, NCW PCS;² AT&T continues to retain

¹ See *Public Notice*, Report No. TEL-01223 (rel. Jan. 10, 2008) (announcing grant of File No. ITC-T/C-20071214-00505).

² The changes in the intermediate ownership of NCW PCS are so minor that they do not even result in a *pro forma* transfer of control. See 47 C.F.R. § 63.24(c), (d).

ultimate control of NCW PCS. The changes also include updated information on AT&T's interlocking directorates. The foreign carrier affiliates associated with the additional interlocking directorates were all previously disclosed in the initial application as entities in which AT&T holds a controlling interest, so this information is not of decisional significance. Additionally, the list of AT&T foreign carrier affiliates has been updated to delete AT&T Red Global Telecommunications Ltda. in Chile. Finally, the legal citation supporting non-dominant classification on all relevant international routes has been changed to Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3), as opposed to Section 63.10(a)(4).

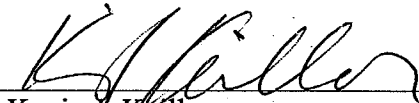
The Applicants request that the Commission associate this updated information with File No. ITC-T/C-20071214-00505. Please contact the undersigned if you have questions or need additional information. This letter may be signed in counterparts, which together shall constitute one document.

Respectfully submitted,

EDGE WIRELESS HOLDING COMPANY, LLC

NEW CINGULAR WIRELESS PCS, LLC

By:



Kevin J. Keillor
Secretary

By:

David C. Jatlow
Assistant Secretary

Encl.

ultimate control of NCW PCS. The changes also include updated information on AT&T's interlocking directorates. The foreign carrier affiliates associated with the additional interlocking directorates were all previously disclosed in the initial application as entities in which AT&T holds a controlling interest, so this information is not of decisional significance. Additionally, the list of AT&T foreign carrier affiliates has been updated to delete AT&T Red Global Telecommunications Ltda. in Chile. Finally, the legal citation supporting non-dominant classification on all relevant international routes has been changed to Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3), as opposed to Section 63.10(a)(4).

The Applicants request that the Commission associate this updated information with File No. ITC-T/C-20071214-00505. Please contact the undersigned if you have questions or need additional information. This letter may be signed in counterparts, which together shall constitute one document.

Respectfully submitted,

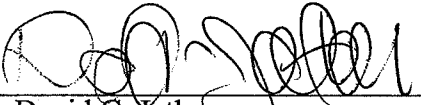
EDGE WIRELESS HOLDING COMPANY, LLC

NEW CINGULAR WIRELESS PCS, LLC

By:

Wayne M. Perry
Duly Authorized Employee

By:



David C. Jatlow
Assistant Secretary of Manager

Encl.

**UPDATED ATTACHMENT 1 TO FCC ELECTRONIC FORM
FOR TRANSFER OF CONTROL
OF INTERNATIONAL SECTION 214 AUTHORIZATION**

Answer to Question 10 - Section 63.18(c)-(d):

Transferor Information (Edge Wireless Holding Company, LLC):

Contact Information:

Wayne M. Perry, Manager
650 SW Columbia, Suite 7200
Bend, OR 97702
Tel: 541-330-9698
Fax: 541-330-9558

with a copy to

Thomas Gutierrez
Lukas, Nace, Gutierrez & Sachs, Chartered
1650 Tysons Boulevard, Suite 1500
McLean, VA 22102
Tel: 703-584-8678
Fax: 703-584-8696
tgutierrez@fcclaw.com

International Section 214 Authorizations:

Edge Wireless, LLC ("Edge Wireless"), a subsidiary of the Transferor, holds an international Section 214 authorization to provide global or limited global resale service. See ITC-214-20001116-00672.

Transferee Information (New Cingular Wireless PCS, LLC):

Contact Information:

Michael P. Goggin, Assistant Secretary
1120 - 20th Street, N.W.
Washington, DC 20036
Tel: 202-457-2055
Fax: 202-457-3074
Michael.p.goggin@att.com

International Section 214 Authorizations:

Transferee is an indirect wholly-owned subsidiary of AT&T Mobility LLC (“AT&T Mobility”), whose ultimate parent is AT&T Inc. (“AT&T”). Subsidiaries that are wholly-owned or controlled by AT&T collectively hold global or limited global facilities-based or resale Section 214 authorizations, including those for Cuba. These subsidiaries hold Section 214 global authority to provide a range of facilities-based services, see, e.g., ITC-214-19960830-00414 (Previous File Number ITC-96-487) (AT&T Corp. authority to provide global facilities-based services), including those originating in region and out of region, see, e.g., ITC-214-20001130-00713 (SBC Long Distance, LLC authority to provide facilities-based and resale services originating in Kansas and Oklahoma); ITC-214-19971108-00689 (SBC Long Distance, LLC authority to provide facilities-based services originating out of region). AT&T subsidiaries also have Section 214 global authority to provide various resale services. See, e.g., ITC-214-19960223-00083 (SNET America, Inc. authority to resell private line services); ITC-214-19970814-00493 (Previous File Number ITC-97-506) (TC Systems, Inc. global authority to resell international switched services). Other AT&T subsidiaries hold authority to provide services on particular routes or over particular facilities. See, e.g., ITC-89-060 (AT&T of Puerto Rico, Inc. and AT&T of the Virgin Islands, Inc. authority to operate additional capacity in St. Thomas-Tortola and Eastern Caribbean DCMS for use in providing services to various Caribbean points). AT&T’s subsidiaries do not provide services to any of the countries in which they have an affiliate solely through the resale of the international switched services of an unaffiliated United States facilities-based carrier.

Deleted: AT&T has fifty wholly-owned
s

Deleted: that

A complete list of the AT&T subsidiaries holding Section 214 authorizations, the file numbers associated with such authorizations and a description of such authorizations is set forth below in Attachment A.¹

Answer to Question 11 - Section 63.18(h):

NCW PCS is an indirect wholly-owned subsidiary of AT&T Mobility, which is an indirect wholly-owned subsidiary of AT&T. AT&T is a publicly traded corporation whose stock is widely held by the public with no person or entity holding a ten percent or greater ownership interest in AT&T. Additional ownership information for NCW PCS and AT&T Mobility is provided below.

¹ As a result of an internal reorganization that occurred on December 31, 2007, CCPR Paging, Inc. listed in Attachment A was merged into CCPR Services, Inc., another AT&T-controlled subsidiary listed in Attachment A. In addition, as part of a separate internal reorganization that occurred on January 15, 2008, American Cellular Corporation, Dobson Cellular Systems, Inc., and Dobson Communications Corporation that also are listed in Attachment A were converted into limited liability companies. Notifications of *pro forma* assignment will be filed to reflect the internal assignments of the international Section 214 authorizations involved in due course.

Section 63.18(h). The name, address, citizenship, and principal business of each of AT&T Mobility's ten percent or greater interest holders are:²

Direct Ownership

AT&T Mobility Corporation
5565 Glenridge Connector
Atlanta, GA 30342
Citizenship: Delaware
Principal Business: Management Company
Ownership Interest: less than 1% of and controls AT&T Mobility

BellSouth Mobile Data, Inc.
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Georgia
Principal Business: Holding Company
Ownership Interest: Approximately 19% of AT&T Mobility

~~New BellSouth Cingular Holdings, Inc.~~
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Georgia
Principal Business: Holding Company
Ownership Interest: Approximately 21% of AT&T Mobility

Deleted: BLS

Deleted: LLC

SBC Alloy Holdings, Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Ownership Interest: Approximately 31% of AT&T Mobility

SBC Long Distance, LLC
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Ownership Interest: Approximately 29% of AT&T Mobility

² The ownership interests provided herein are the actual direct ownership interests held in the next disclosed subsidiary in the vertical ownership chain rounded to the nearest one percent.

Indirect Ownership

New AB Cellular Holding, LLC
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: Approximately 98% of New BellSouth Cingular Holdings, Inc.

Deleted: BLS

Deleted: LLC

AT&T Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of AT&T Management Services Holdings, 100% of AT&T Teleholdings, Inc., 100% of New SBC Wireless, Inc.; 83% of AT&T Services Inc., 50% of AT&T Mobility Corporation, and 100% of BellSouth Corporation

AT&T Teleholdings, Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 20% of SBC Alloy Holdings, Inc., 20% of New Southwestern Bell Mobile Systems, Inc., approximately 6% of AT&T Services, Inc, and 100% of SBC Telecom, Inc.

AWACS, Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Pennsylvania
Principal Business: Telecommunications
Direct Ownership Interest: Approximately 14% of SBC Alloy Holdings, Inc.

BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Georgia
Principal Business: Holding Company
Direct Ownership Interest: 100% of BellSouth Enterprises, Inc. and 50% of AT&T Mobility Corporation

BellSouth Enterprises, Inc.
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Georgia
Principal Business: Holding Company
Direct Ownership Interest: 100% of BellSouth Mobile Systems, Inc.

BellSouth Mobile Data, Inc.
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Georgia
Principal Business: Holding Company
Direct Ownership Interest: Approximately 100% of New AB Cellular Holding
LLC and 2% of New BellSouth Cingular Holdings, Inc.

Deleted: 98

Deleted: ,

BellSouth Mobile Systems, Inc.
1155 Peachtree Street, N.E.
Atlanta, GA 30309
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of BellSouth Mobile Data, Inc.

Delaware Valley Cellular Corporation
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 100% of AWACS, Inc.

New SBC Wireless, Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: 80% of New Southwestern Bell Mobile Systems, Inc.
and approximately 4% of SBC Alloy Holdings, Inc.

New Southwestern Bell Mobile Systems, Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Principal Business: Holding Company
Direct Ownership Interest: Approximately 62% of SBC Alloy Holdings, Inc.

SBC Telecom, Inc.
175 East Houston
San Antonio, TX 78205
Citizenship: Delaware
Direct Principal Business: Holding Company
Ownership Interest: 100% of SBC Long Distance, LLC

In addition to the interest holders disclosed for AT&T Mobility, all of which are also disclosable interest holders for NCW PCS, the following is the name, address, citizenship, and principal business of each of the additional ten percent or greater interest holders in NCW PCS:

Direct Ownership

AT&T Mobility II, LLC
5565 Glenridge Connector
Atlanta, GA 30342
Citizenship: Delaware
Principal Business: Holding Company
Ownership Interest: 100% percent of New Cingular Wireless PCS, LLC

Indirect Ownership

AT&T Mobility LLC
5601 Legacy Drive, MS: A-3
Plano, TX 75024
Citizenship: Delaware
Principal Business: Provision of CMRS Services
Direct Ownership Interest: 57% of AT&T Mobility II, LLC and 100% of New Cingular Wireless Services, Inc.

New Cingular Wireless Services, Inc.
5601 Legacy Drive, MS: A-3
Plano, TX 75024
Citizenship: Delaware
Principal Business: Provision of CMRS Services
Direct Ownership Interest: 43% of AT&T Mobility II, LLC

Answer to Question 12 - Section 63.18(h):

AT&T does have interlocking directorates with Teléfonos de México, S.A. de C.V. ("Telmex"), which is a carrier or controls carriers in Argentina, Brazil, Chile, Colombia, Mexico, Peru, the United States, and Uruguay; with América Móvil, S.A. de C.V. ("América Móvil"), which is a carrier or controls carriers in Argentina, Brazil, Chile, Colombia, the Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras,

Mexico, Nicaragua, Paraguay, Peru, the United States, and Uruguay; AT&T Global Network Services International, Inc., which is a carrier in Israel, New Zealand, and Pakistan; AT&T Global Network Services Norge LLC, which is a carrier in Norway; AT&T Global Network Services Venezuela LLC, which is a carrier in Venezuela; and BellSouth Long Distance, Inc., which is a carrier in Canada. Rayford Wilkins, Jr., Group President of AT&T Inc., is a director of both Telmex and América Móvil while John J. Stephens, Vice President and Controller of AT&T Inc., is a director of América Móvil. In addition, Eric D. Boyer, President Mexico for AT&T International, Inc. (a wholly owned subsidiary of the Transferee), also is a director of Telmex. Charles Allen, Assistant Treasurer of AT&T Inc., is a director and Treasurer of AT&T Global Network Services International, Inc.; AT&T Global Network Services Norge LLC; and AT&T Global Network Services Venezuela LLC. Mr. Allen is also Vice President and Treasurer of BellSouth Long Distance, Inc. Tod A. Clarno, Vice President-Taxes of AT&T Corp. is a director at AT&T Global Network Services International, Inc.; AT&T Global Network Services Norge LLC; and AT&T Global Network Services Venezuela, LLC. Thomas S. Clemens, Assistant Treasurer of AT&T Corp., is also an Assistant Treasurer of AT&T Global Network Services International, Inc.; AT&T Global Network Services Norge LLC; AT&T Global Network Services Venezuela, LLC; and BellSouth Long Distance, Inc. Kevin T. Fix, Assistant Treasurer of AT&T Corp., is also an Assistant Treasurer of AT&T Global Network Services International, Inc.; AT&T Global Network Services Norge LLC; AT&T Global Network Services Venezuela, LLC; and BellSouth Long Distance, Inc.

Deleted: Richard P. Resnick

Deleted: -SBCI

Deleted: SBC

Answer to Question 13 - Narrative of Transfer of Control and Public Interest Statement:

Edge Wireless Holding Company, LLC (“Edge Holding Company”), Transferor, and New Cingular Wireless PCS, LLC (“NCW PCS”), Transferee, are seeking Commission consent to transfer control of Edge Wireless and other related subsidiaries from Edge Holding Company to NCW PCS as part of an acquisition of broadband Personal Communications Service (“PCS”) spectrum and related wireless operations in several markets in the northwestern United States.³ The international Section 214 authorization that is the subject of the instant application is an ancillary authorization to the overall transaction.

NCW PCS currently holds a 35.7 percent, non-controlling equity interest in Edge Wireless. On November 29, 2007, the Parties executed a Unit Acquisition Agreement, pursuant to which NCW PCS will acquire Edge Holding Company’s 64.3 percent

³ The Parties have separately sought approval with the Wireless Telecommunications Bureau for the transfer of control of the wireless radio licenses involved in the transaction. See ULS File No. 0003256509 (Lead Application).

controlling interest in Edge Wireless. As a result of the proposed transaction, Edge Wireless will become a wholly-owned subsidiary of NCW PCS.

Commission approval of the proposed transaction will promote the public interest in at least two principal ways. First, the proposed transaction will allow AT&T Mobility to continue to pursue the goal of enhancing nationwide service by enabling it to acquire spectrum in areas where it currently does not operate. Specifically, the proposed transaction would expand AT&T Mobility's licensed service area to include all or part of six BTAs (Coos Bay, OR, Idaho Falls, ID, Klamath Falls, OR, Pocatello, ID, Rock Springs, WY, and Twin Falls, ID) where AT&T Mobility does not currently hold spectrum or provide service. In a broadband wireless market where many major competitors are competing based upon their breadth of coverage, grant of the instant applications will enable AT&T Mobility to compete more effectively and offer expanded service to consumers. The Commission has repeatedly recognized the many consumer benefits that flow from an expanded footprint, including the offering of competitive services to more consumers across the country and the availability of enhanced services and/or lower prices due to the wider service area.⁴

Second, in areas where AT&T Mobility and its affiliates currently hold licenses and/or leased spectrum rights, the proposed transaction will enable AT&T Mobility to achieve greater operational efficiencies and offer improved, more robust and advanced services to meet the needs of new and existing subscribers.⁵ Specifically, the additional spectrum will enable AT&T Mobility to increase its system capacity to enhance existing services, better accommodate its overall growth, and facilitate the provision of additional

⁴ See *Midwest Wireless Holdings, L.L.C. and Alltel Communications, Inc.*, 21 FCC Rcd 11526, 11566-68 (2006); *Western Wireless Corporation and Alltel Corporation*, 20 FCC Rcd 13053, 13102-04 (2005) ("*Alltel-Western Order*"); *NextWave Personal Communications, Inc. and Cingular Wireless LLC*, 19 FCC Rcd 2570, 2585 (2004) ("*Cingular-NextWave Order*"); *Applications of SBC Communications, Inc. and BellSouth Corp.*, 15 FCC Rcd 25459, 25480 (WTB/IB 2000); *Annual Report and Analysis of Competitive Market Conditions with Respect to CMRS, Eleventh Report*, 21 FCC Rcd 10947, 10968 (2006); see also *AT&T Inc. and Dobson Communications Corporation*, FCC 07-196, at ¶ 79 (rel. Nov. 19, 2007) ("*AT&T-Dobson Order*").

⁵ Transactions that give rise to these results have been found by the Commission to be in the public interest. See *AT&T-Dobson Order* at ¶¶ 79, 83; *AT&T Wireless Services, Inc. and Cingular Wireless Corp.*, 19 FCC Rcd 21522, 21607 (2004) ("*Cingular-AT&T Wireless Order*"); *Cingular-NextWave Order*, 19 FCC Rcd at 2585; *Northcoast Communications, LLC and Cellco Partnership d/b/a Verizon Wireless*, 18 FCC Rcd 6490, 6493 (WTB/CWD 2003).

products and services to the public.⁶ The additional spectrum will also facilitate AT&T Mobility's continued deployment of EDGE and HSDPA/UMTS technologies.⁷

For more information on the public interest benefits of the proposed transaction please see the lead application filed with the Wireless Telecommunications Bureau for the transfer of control of the wireless radio licenses involved in the transaction, *see* ULS File No. 0003256509.

Answer to Question 14 - Section 63.18(i):

AT&T and its subsidiaries that hold international Section 214 authorizations are presently affiliated with numerous foreign carriers authorized to provide telecommunications services to the public. Upon consummation of this transaction, Edge Wireless also will be affiliated with those foreign carriers, which are listed below:

Deleted: fifty

<u>Foreign Carrier</u>	<u>Country</u>
AT&T Communications Services Argentina S.R.L.	Argentina
AT&T Global Network Services Australia Pty. Ltd.	Australia
AT&T Global Network Services Austria GmbH	Austria
AT&T Global Network Services Belgium Luxembourg S.P.R.L.	Belgium
AT&T Global Network Services Brazil Ltda.	Brazil
AT&T Global Network Services Bulgaria Ltd.	Bulgaria
AT&T Global Services Canada Co.	Canada
AT&T Enterprises Canada Co.	Canada
BellSouth Long Distance, Inc.	Canada
AT&T Chile SA	Chile
AT&T Global Network Services Colombia (Ltda.)	Colombia
AT&T Global Network Services Hrvatska d.o.o.	Croatia
AT&T Global Network Services Czech Republic s.r.o.	Czech Republic
AT&T Global Network Services Ltd.	Cyprus
AT&T Global Network Services Denmark ApS	Denmark
AT&T Global Network Services Ecuador Cia. Ltda.	Ecuador
AT&T Global Network Services Estonia Ou	Estonia
AT&T Global Network Services Finland Oy	Finland

Deleted: AT&T Red Global Telecommunications Ltda. ... [1]

⁶ Among other things, the Commission's public interest calculus takes into consideration the extent to which the transaction will accelerate the "deployment of advanced services" and "affect the quality of communications services or will result in the provision of new or additional services to consumers." *AT&T-Dobson Order* at ¶ 12; *Alltel-Western Order*, 20 FCC Rcd at 13064-65; *Cingular-AT&T Wireless Order*, 19 FCC Rcd at 21544.

⁷ See, e.g., *AT&T-Dobson Order* at ¶ 4.

AT&T Global Network Services France SAS	France
AT&T Global Network Services Deutschland GmbH	Germany
AT&T Global Network Services (Hellas) E.P.E. (Limited)	Greece
AT&T Servicios de Comunicaciones de Guatemala SA	Guatemala
AT&T Global Network Services Hong Kong Limited	Hong Kong
AT&T Global Network Services Hungary Kft	Hungary
AT&T Global Network Services Private Limited	India
AT&T Global Network Services Ireland Limited	Ireland
AT&T Global Network Services International Inc.	Israel
AT&T Global Network Services Italia S.p.A.	Italy
AT&T Japan Ltd.	Japan
AT&T Global Services KK	Japan
AT&T Communications Services (Japan) Ltd.	Japan
AT&T GNS Korea Limited (Yuhan Hoesa)	Korea
AT&T Global Network Services Latvia SIA	Latvia
UAB AT&T Lietuva (Lithuania)	Lithuania
AT&T Global Network Services Belgium Luxembourg S.P.R.L. (Branch Office)	Luxembourg
Alestra, S. de R.L. de C.V.	Mexico
AT&T Global Network Services Nederland B.V.	Netherlands
AT&T Global Network Services International Inc.	New Zealand
AT&T Global Network Services Norge LLC	Norway
AT&T Global Network Services International Inc.	Pakistan
AT&T Communications Services de Panama S. de R.L.	Panama
AT&T Global Network Services del Peru S.R.L.	Peru
AT&T Global Network Services Polska Sp. z.o.o.	Poland
AT&T Serviços de Telecomunicações, Sociedade Unipessoal, Lda.	Portugal
AT&T Global Network Services Romania S.R.L.	Romania
AT&T Global Network Services OOO	Russia
AT&T Worldwide Telecommunications Services Singapore Pte Ltd.	Singapore
AT&T Global Network Services Slovakia s.r.o.	<u>Slovak Republic</u>
AT&T Globalne Omrezne Storitve d.o.o.	Slovenia
AT&T Global Network Services Espana, S.L.	Spain
AT&T Global Network Services Sweden AB	Sweden
AT&T Global Network Services Switzerland GmbH	Switzerland
AT&T Global Network Services Taiwan Ltd.	Taiwan
AT&T Global Iletism Servisleri Limited Sirteki Ltd. STI	Turkey
AT&T Global Network Services (UK) B.V.	United Kingdom
AT&T Global Network Services Venezuela, LLC	Venezuela

Deleted: Slovakia

Answer to Question 15 - Section 63.18(j):

Pursuant to Section 63.18(j) of the Commission's rules, 47 C.F.R. § 63.18(j), AT&T certifies that it is not a foreign carrier but that it holds controlling interests in certain foreign carriers in destination countries where its subsidiaries provide international service. These carriers and the countries where they provide service are described above in the answer to Question 14.

Answer to Question 16 - Section 63.10:

Pursuant to Section 63.10 of the Commission's rules, 47 C.F.R. § 63.10, Edge Wireless qualifies for non-dominant classification on the routes between the United States and all the above-listed countries because the affiliates in these countries have no market power on the foreign end of any of these routes.⁸ All of the above-listed affiliates have market shares under 50 percent in any relevant market on the foreign end of U.S. routes to these countries. Therefore, because all these companies lack 50 percent market share in the international transport and the local access markets in their respective foreign markets, and none is listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Edge Wireless is presumptively classified as non-dominant on these routes.

Answer to Question 18 - Section 63.18(k):

In accordance with Section 63.18(k)(1) of the Commission's rules, 47 C.F.R. § 63.18(k)(1), AT&T certifies that all of the countries listed in its response to Question 15 (therein referencing its response to Question 14) are WTO Member countries, with the exception of Russia.⁹ AT&T certifies that its foreign carrier affiliate in Russia, AT&T Global Network Services, owns no facilities in that destination market, and therefore, lacks market power in Russia, satisfying the requirement of Section 63.18(k)(2).

Answer to Question 20:

The Parties request streamlined processing of the instant application pursuant to Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12. While the Transferee is affiliated with foreign carriers in destination markets, Transferee qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules as set forth in the Answer to Question 16. Moreover, as stated in the Answer to Question 18, all of the destination countries where Transferee is affiliated with a foreign carrier are WTO Member countries, with the exception of Russia. In Russia, AT&T certifies that its

⁸ See 47 C.F.R. §§ 63.10(a)(3).

⁹ See WTO Members and Observers List, at http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (last visited December 14, 2007).

Deleted: 4

Deleted: , 43.61(e)

foreign carrier affiliate owns no facilities in that destination market, and therefore, lacks market power in Russia. Accordingly, streamlined processing is appropriate pursuant to Section 63.12(c)(1)(ii), (iii), (iv).

AT&T Red Global Telecommunications Ltda.

Chile