

ATTACHMENT 1

Pursuant to 47 C.F.R. § 63.24(f), Global Crossing Americas Solutions, Inc. (“GCAS,” FRN 0003755709), notifies the Commission of a *pro forma* transfer of control of four international Section 214 authorizations, as described below.

Answer to Question 10

Correspondence concerning this notification should be sent to:

with a copy to:

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*Counsel for Level 3 Communications,
Inc., Level 3 Financing, Inc., and Global
Crossing Americas Solutions, Inc.*

GCAS holds four international Section 214 authorizations:

- FCC File Nos. ITC-214-19950717-00062 (old FCC File No. ITC-95-434), granting GCAS authority to provide certain common-carrier services using satellite facilities);
- FCC File No. ITC-214-19950831-00047 (old FCC File No. ITC-95-485), granting GCAS authority to provide global resale services pursuant to 47 C.F.R. § 63.18(e)(2);
- FCC File No. ITC-214-19970703-00372 (old FCC File No. ITC-97-399), granting GCAS authority to provide global facilities-based and global resale services pursuant to 47 C.F.R. §§ 63.18(e)(1), (2); and
- FCC File No. ITC-214-19980430-00286 (old FCC File Nos. ITC-98-342 and -342A), granting GCAS and other owners joint authority to provide individual facilities-based service on the Americas-II undersea cable system.

Answer to Question 11

GCAS is a Delaware corporation engaged in the business of telecommunications. GCAS has the following 10-percent-or-greater direct or indirect shareholders:

Impsat Fiber Networks, Inc.

Address: Elvira Rawson de Dellepiane, 150 Piso 8, C1107 BCA, Buenos Aires, Argentina

Citizenship: Delaware

Principal Business: holding company

Relationship: owns 100 percent of GCAS

GC Impsat Holdings II Ltd.

Address: 10 Fleet Place, 7th Floor, London EC4M 7RB, England

Citizenship: United Kingdom

Principal Business: holding company

Relationship: owns 100 percent of Impsat Fiber Networks, Inc.

GC Impsat Holdings I Ltd.

Address: 10 Fleet Place, 7th Floor, London EC4M 7RB, England

Citizenship: United Kingdom

Principal Business: holding company

Relationship: owns 100 percent of GC Impsat Holdings II Ltd.

Level 3 Communications (IMPSAT) Nederland B.V. (f/k/a GC Impsat Holdings Nederland B.V.)

Address: 10 Fleet Place, 7th Floor, London EC4M 7RB, England

Citizenship: Netherlands

Principal Business: holding company

Relationship: owns 100 percent of GC Impsat Holdings I Ltd.

Level 3 GC Limited (“Level 3 GCL”)

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: holding company

Relationship: owns 100 percent of Level 3 Communications (IMPSAT) Nederland B.V.

Level 3 Financing, Inc. (“Level 3 Financing”)

Address: 1025 Eldorado Blvd., Broomfield, Colorado 80021

Citizenship: Delaware, USA

Principal Business: holding company

Relationship: owns 100 percent of Level 3 GCL

Level 3 Communications, Inc. (“Level 3 Parent”)

Address: 1025 Eldorado Blvd., Broomfield, Colorado 80021

Citizenship: Delaware, USA

Principal Business: telecommunications

Relationship: owns 100 percent of Level 3 Financing, Inc.

Southeastern Asset Management, Inc. (“SAM”)

Address: 6410 Poplar Avenue, Suite 900, Memphis, Tennessee 38119

Citizenship: Tennessee, USA

Principal Business: investment advisory services

Relationship/Interest: SAM holds sole or shared voting rights for 21.94 percent of outstanding shares of Level 3 Parent that are otherwise owned by other entities for whom SAM acts as an investment advisor. None of SAM’s owners holds a ten-percent-or-greater direct or indirect interest in Level 3 Parent.

STT Crossing Ltd (“STT Crossing”)

Address: 10 Frere Felix de Valois Street, Port Louis, Mauritius

Citizenship: Mauritius

Principal Business: holding company

Relationship: owns approximately 24.926 percent of Level 3 Parent

STT Communications Ltd (“STT Communications”)

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: information communications

Relationship: owns 100 percent of STT Crossing

Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”)

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: investment holding company

Relationship: owns 100 percent of STT Communications

Temasek Holdings (Private) Limited (“Temasek”)

Address: 60B Orchard Road #06-18, The Atrium@Orchard, Singapore 238891

Citizenship: Singapore

Principal Business: investment holding company

Relationship: owns 100 percent of ST Telemedia

Temasek is wholly owned by the Government of Singapore through the Minister for Finance

Answer to Question 12

Neither Level 3 Financing nor Level 3 GCL—the transferees in the transaction steps described below in response to Question 13—has any interlocking directorate with any foreign carrier.

Answer to Question 13

GCAS is a wholly-owned, indirect subsidiary of Level 3 Parent, as it has been since Level 3 Parent acquired Global Crossing Limited in 2011 following Commission review and consent.¹ Subsequent to that acquisition, Level 3 Parent undertook an internal reorganization process involving indirect parent entities of GCAS in order to simplify the ownership structure of Level 3 Parent's holding and operating companies and to discharge the debt of Global Crossing Limited. This reorganization included the following steps:

- (1) Level 3 Parent contributed all of the issued and outstanding shares of Level 3 GCL to Level 3 Financing, in a transaction consummated on October 4, 2011, and
- (2) Level 3 Financing caused the merger of Global Crossing Holdings Limited into Level 3 GCL, with Level 3 GCL surviving, in a transaction consummated on December 31, 2012.

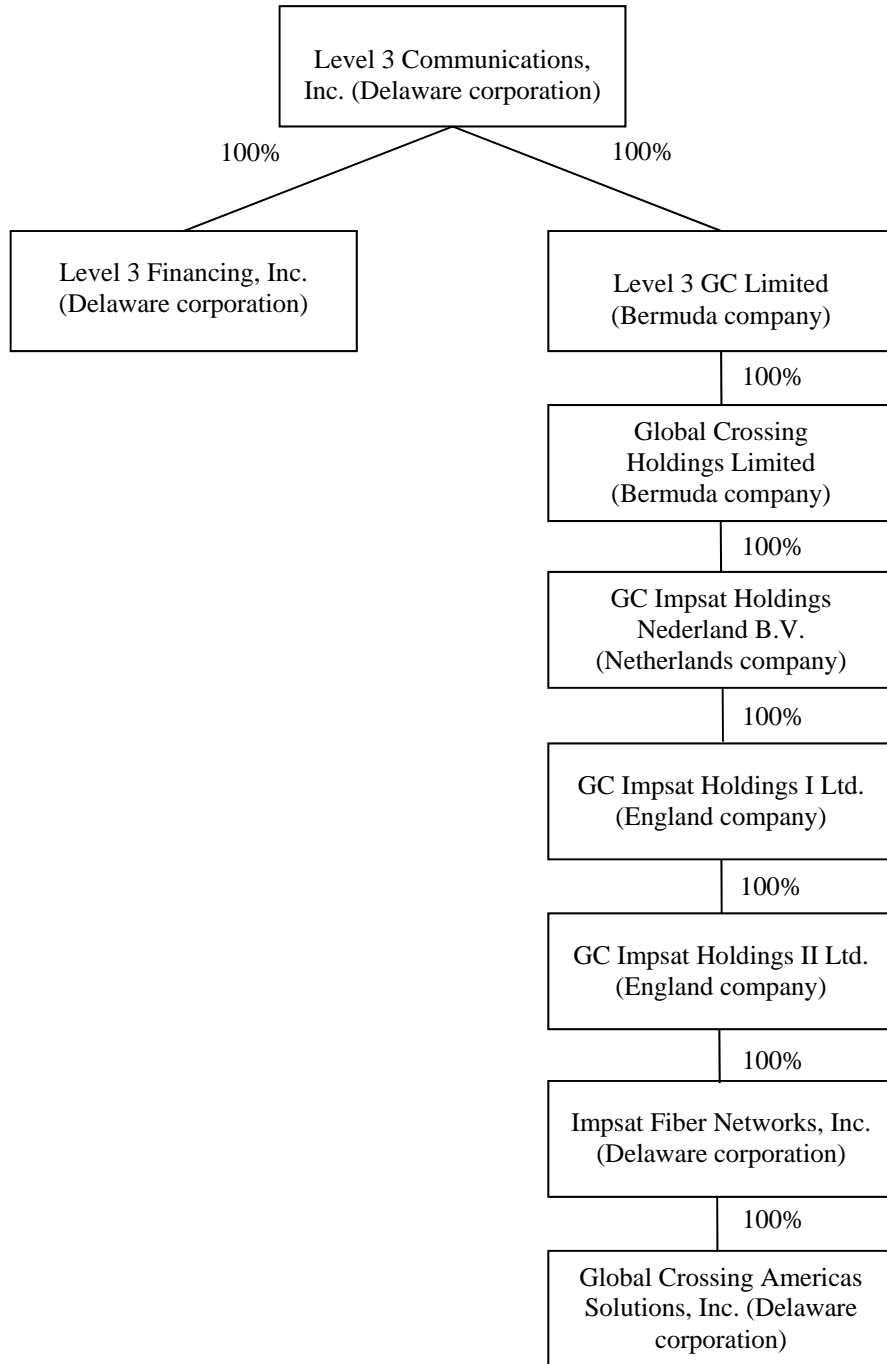
In Attachment 2, GCAS details its pre-consummation ownership structure. In Attachment 3, GCAS details its post-consummation ownership structure.

Before and after the execution of each of these steps (collectively, the “*Pro Forma* Transactions”), the above-referenced international Section 214 authorizations remained under the indirect ownership and control of Level 3 Parent. GCAS regrets that this notification was not made within 30 days of consummation of the *Pro Forma* Transactions but submits that no public-interest harms have result from the delay in filing this notification.

¹ *Applications filed by Global Crossing Limited and Level 3 Communications, Inc. for Consent to Transfer Control*, Memorandum Opinion and Order and Declaratory Ruling, 26 FCC Rcd. 14,056 (Int'l, Wireless Tel. and Wireline Comp. Burs. 2011).

ATTACHMENT 2

**Direct and Indirect Parents of Global Crossing Americas Solutions, Inc., Prior to
Consummation of the *Pro Forma* Transactions**



ATTACHMENT 3

Direct and Indirect Parents of Global Crossing Americas Solutions, Inc., Following Consummation of the *Pro Forma* Transactions



* GC Impsat Holdings Nederland B.V.'s name was changed to Level 3 Communications (IMPSAT) Nederland B.V. following Level 3 Communications, Inc.'s acquisition of Global Crossing Limited.