

**ATTACHMENT 1  
FOR THE *PRO FORMA* TRANSFER OF CONTROL OF  
INTERNATIONAL SECTION 214 AUTHORIZATION**

This filing notifies the Commission pursuant to Section 63.24(f) of the Commission's rules of the *pro forma* transfer of control of an international Section 214 authorization from and to subsidiaries controlled by AT&T Inc. ("AT&T").<sup>1</sup> Specifically, on March 31, 2015, immediate ownership and control of Cricket Communications, LLC ("Cricket Communications") was transferred from Cricket, Inc. ("Cricket") to Cricket Wireless LLC ("Cricket Wireless").<sup>2</sup> The restructuring does not change the ultimate ownership or control of the international Section 214 authorization; AT&T continues to control the authorization at issue. Accordingly, the transfer of control was *pro forma* in nature.

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

The name, title, address and telephone for the Cricket Communications officer follows:

Michael P. Goggin  
Assistant Secretary of Manager  
AT&T Mobility LLC  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036  
Tel: (202) 457-2055  
Fax: (202) 457-3073  
michael.p.goggin@att.com

**International Section 214 Authority:**

Cricket Communications holds the international Section 214 authorization that is the subject of this *pro forma* transfer of control application, File No. ITC-214-20100604-00227 (authorization to provide facilities-based and resale services).

Cricket Communications' ultimate parent, AT&T, has numerous subsidiaries that collectively hold global or limited global facilities-based or resale Section 214 authorizations, including those for Cuba. These subsidiaries hold international 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

<sup>1</sup> *See* 47 C.F.R. § 63.24(f).

<sup>2</sup> Notification is being filed separately with the Wireless Telecommunications Bureau for the radio licenses impacted by the internal reorganization.

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).

**Answer to Question 11 – Section 63.18(h):**

The name, address, citizenship, and principal business of each of Cricket Communications' ten percent or greater interest holders are:<sup>3</sup>

***Direct Ownership of Cricket Communications, LLC***

Cricket Wireless, LLC  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of Cricket Communications

***Indirect Ownership of Cricket Communications, LLC***

Cricket, Inc.  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 72% of Cricket Wireless LLC

Cricket Holdco, Inc.  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 64.28% of Cricket, Inc.

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<sup>3</sup> 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. This listing reflects Cricket Communications' post-restructuring ownership.

Leap Wireless International, Inc.  
1025 Lenox Park Blvd NE

Atlanta, GA 30319  
Citizenship: Delaware  
Principle Business: Holding Company  
Direct Ownership Interest: 100% of Cricket Holdco Inc. and 24% of Cricket, Inc.

LWI Holdco, Inc.  
1025 Lenox Park Blvd NE  
Atlanta, GA 30316  
Citizenship: Delaware  
Principle Business: Holding Company  
Direct Ownership Interest: 100% of Leap Wireless International, Inc.

AT&T Mobility II LLC  
1025 Lenox Park Blvd. NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 35.72% of Cricket Wireless LLC and 100% of LWI Holdco, Inc.

AT&T Mobility LLC  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Provision of Mobile Wireless Services  
Direct Ownership Interest: 54% of AT&T Mobility II LLC

AT&T Mobility Corporation  
1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Management Company  
Direct Ownership Interest: manager of and controls AT&T Mobility LLC

AT&T Teleholdings, Inc.  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of SBC Telecom, Inc.

BellSouth Mobile Data, Inc.

1025 Lenox Park Blvd NE  
Atlanta, GA 30319  
Citizenship: Georgia  
Principal Business: Holding Company  
Direct Ownership Interest: 40% of AT&T Mobility LLC, 100% of AT&T Mobility Corporation, 4% of AT&T Mobility II LLC, and 40% of AT&T NCWS Holdings Inc.

AT&T NCWS Holdings Inc.  
1025 Lenox Park Blvd. NE  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of New Cingular Wireless Services, Inc.

New Cingular Wireless Services, Inc.  
1025 Lenox Park Blvd.  
Atlanta, GA 30319  
Citizenship: Delaware  
Principal Business: Provision of Mobile Wireless Services  
Direct Ownership Interest: 42% of AT&T Mobility II LLC

SBC Long Distance, LLC  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 50% of AT&T Mobility LLC

SBC Telecom, Inc.  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Direct Principal Business: Holding Company  
Direct Ownership Interest: 100% of SBC Long Distance, LLC, 60% of AT&T NCWS Holdings Inc., and 9% of AT&T Mobility LLC

AT&T Inc.  
208 S. Akard Street  
Dallas, TX 75202  
Citizenship: Delaware  
Principal Business: Holding Company  
Direct Ownership Interest: 100% of AT&T Teleholdings, Inc. and 100% of BellSouth Mobile Data, Inc.

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.

**Answer to Question 12 – Section 63.18(h):**

The persons listed below are officers or directors of one or more of the following: AT&T NCWS Holdings Inc., AT&T Global Network Services International, New Cingular Wireless Services, Inc., New Cingular Wireless PCS, LLC, AT&T Mobility II LLC, AT&T Mobility LLC, AT&T Mobility Corporation, AT&T Teleholdings, Inc., LWI Holdco, Inc. SBC Long Distance, LLC, SBC Telecom, Inc., BellSouth Mobile Data, Inc., and AT&T Inc. and are also officers or directors of one or more of the following foreign carriers: BellSouth Long Distance, Inc., which is a carrier in Canada; 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; and AT&T Global Network Services Venezuela LLC, which is a carrier in Venezuela.

Charles Bolton is President and Manager of SBC Long Distance, LLC; and President and Director of BellSouth Long Distance, Inc. George B. Goeke is Assistant Treasurer of AT&T Inc., Vice President and Assistant Treasurer of AT&T Teleholdings, Inc., AT&T Mobility Corporation, Treasurer of SBC Long Distance, LLC, SBC Telecom, Inc.; and is also Vice President and Treasurer of BellSouth Long Distance, Inc., and Director and Treasurer of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services Venezuela LLC, and Treasurer of AT&T Japan LLC. Elaine Lou is Assistant Treasurer of SBC Long Distance, LLC, SBC Telecom, Inc.; BellSouth Long Distance, Inc., AT&T Japan LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC. Karen M. Diorio is Assistant Secretary of AT&T Global Network Services International, Inc., AT&T Global Network Services Norge LLC, and AT&T Global Network Services Venezuela LLC; and Director of Tax of SBC Long Distance, LLC, SBC Telecom, Inc., and AT&T Teleholdings, Inc. Teresa G. Blizzard is Assistant Secretary of AT&T Mobility Corporation, BellSouth Mobile Data, Inc., LWI Holdco, Inc., New Cingular Wireless Services, Inc. and AT&T NCWS Holdings, Inc., Director-Tax of AT&T Teleholdings, Inc., SBC Long Distance, LLC and SBC Telecom, Inc.; and Vice President – Taxes of BellSouth Long Distance, Inc. Lawrence J. Ruzicka is Senior Vice President of AT&T NCWS Holdings, Inc., AT&T Mobility Corporation, New Cingular Wireless Services, Inc., BellSouth Mobile Data, Inc., LWI Holdco, Inc., Senior Vice President – Tax of AT&T Inc., and Vice President – Tax of SBC Long Distance, LLC and SBC Telecom, Inc.; and is also Director for AT&T Global Network Services, Norge, LLC, AT&T Global Network Services International, Inc., and AT&T Global Network Services Venezuela, LLC. Jeffrey M. Chambers is Assistant Secretary of AT&T Mobility Corporation; and Assistant Vice President – Taxes of AT&T Global Network Services Norge LLC, AT&T Global Network Services International, Inc., and AT&T Global Network Services Venezuela, LLC. Sherri L. Bazan is Assistant Treasurer of BellSouth Mobile Data, Inc., AT&T Teleholdings, Inc., AT&T Mobility Corporation, AT&T NCWS Holdings, Inc., New Cingular Wireless Services, Inc., SBC Long Distance, LLC, SBC Telecom, Inc., LWI Holdco Inc.; and also BellSouth Long Distance, Inc., AT&T Global Network Services Norge LLC, AT&T Global

Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, and AT&T Japan LLC. Thomas F. Brown is Assistant Secretary of AT&T Mobility Corporation, New Cingular Wireless Services, Inc., AT&T NCWS Holdings, Inc., Bell South Mobile Data, Inc.; and AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, AT&T Japan LLC, and AT&T Global Network Services Norge LLC. Steven Shashack is Assistant Secretary of AT&T Mobility Corporation, Assistant Vice President – Tax of SBC Long Distance, LLC, SBC Telecom, Inc.; and AT&T Global Network Services Norge LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, AT&T Japan LLC. Stacy W. Roth is Assistant Treasurer of SBC Telecom, Inc., AT&T Mobility Corporation, AT&T Teleholdings, Inc., SBC Long Distance, LLC; and BellSouth Long Distance, Inc., AT&T Global Network Services Norge LLC, AT&T Global Network Services International, Inc., AT&T Global Network Services Venezuela, LLC, and AT&T Japan LLC.

### **Answer to Question 13**

This filing hereby notifies the Commission pursuant to Section 63.24(f) of its rules, 47 C.F.R. § 63.24(f), of the *pro forma* transfer of control of an international Section 214 authorization held by Cricket Communications, an indirect wholly owned subsidiary of AT&T. Specifically, on March 31, 2015, immediate ownership and control of Cricket Communications was transferred from Cricket to Cricket Wireless. The restructuring does not change the ultimate ownership or control of the international Section 214 authorization; AT&T continues to control the authorization at issue.

This restructuring does not change the ultimate ownership or control of the international Section 214 authorization, as AT&T has continued to control it both before and after the restructuring. Accordingly, this transfer of control is *pro forma* in nature. The Commission has previously stated 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.”<sup>4</sup>

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<sup>4</sup> 1998 Biennial Review – Review of International Common Carrier Regulations, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999).