



Google LLC  
25 Massachusetts Avenue NW  
Ninth Floor  
Washington, DC 20001

202-346-1100 main  
google.com

October 12, 2017

**Via Electronic Filing**

**Re: Google North America Inc. Notification of Pro Forma Transfer of Control**

To Whom It May Concern:

Google North America Inc. (Google North America) submits this Notification of Pro Forma Transfer of Control, pursuant to Sections 63.03(d)(2) and 63.24(d) of the Commission's Rules, 47 C.F.R. §§ 63.03(d)(2) and 63.24(d).

Google North America holds an International Section 214 authority to provide global or limited global resale services granted in IB File No. ITC-214-20150312-00069. Google North America is also authorized to provide interstate service by virtue of blanket domestic Section 214 authority under 47 C.F.R. § 64.01.

By this filing, Google North America provides the Commission with notice of a corporate reorganization.

On June 29, 2017, Alphabet Inc. (Alphabet) created XXVI Holdings Inc. (XXVI Holdings), a new, wholly-owned subsidiary organized under the laws of the state of Delaware. On September 30, 2017, Alphabet transferred ownership of Google Inc. (Google) to XXVI Holdings. This made Google a direct, wholly-owned subsidiary of XXVI Holdings. The transfer of ownership did not result in a change of control in terms of Google's ultimate ownership by Alphabet.

Thereafter, Google converted from a corporation into a limited liability company, Google LLC, organized under the laws of the state of Delaware. In accordance with Delaware statutes, the conversion of Google to Google LLC is analogous to a name change. This corporate reorganization did not involve an assignment of any license or a change in the day-to-day operations of Google/Google LLC. Google LLC's rights and obligations under any contracts and its services and the terms for those services remain the same as Google's.

The corporate reorganization did not involve an assignment of any license or a change in the day-to-day operations of Google North America. Google North America's services and the terms for those services were unaffected. The corporate reorganization only created a new corporate structure, and did not result in a change of Google North America's ultimate ownership and shareholder control.

As required by Sections 63.03(d)(2) and 63.24(f)(2), of the Commission's Rules (47 C.F.R. §§ 63.03(d)(2) and 63.24(f)(2)), Google North America provides the following information specified in 63.04(a)(1) through (a)(4) and 63.18(a) through (d) and (h) of the Commission's Rules (47 C.F.R. §§ 63.04 and 63.18):

**1. Sections 63.04(a)(1) 63.18(a):** Name, address and telephone number of Google North America (FRN 0024413478):

Google North America Inc.  
1600 Amphitheatre Parkway  
Mountain View, CA 94043  
Telephone: (650) 253-0000

**2. Sections 63.04(a)(2) and 63.18(b):** Google North America is a Delaware corporation.

**3. Sections 63.01(a)(3) and 63.18(c):** Correspondence concerning this filing should be sent to:

Austin Schlick  
Director  
Google LLC  
25 Massachusetts Avenue NW, Ninth Floor  
Washington, DC 20001  
Telephone: (202) 346-1219  
[schlick@google.com](mailto:schlick@google.com)

**4. Section 63.18(d):** Google North America holds International Section 214 authority to provide global or limited global resale services granted in IB File No. ITC-214-20150312-00069. Google North America is also authorized to provide interstate service by virtue of blanket domestic Section 214 authority under 47 C.F.R. § 64.01.

**5. Sections 63.04(a)(4) and 63.18(h):** The name, address, citizenship, and principal business activity of any person having a 10% or greater interest in Google North America is attached hereto as Exhibit B. Google North America does not have any interlocking directorates with foreign carriers. Through its ownership by Google LLC, Google North America is affiliated with the following foreign carriers, as that term is defined by Section 63.09 of the Commission's rules:

<i>Name of affiliated foreign carrier</i>	<i>Countries in which carrier is authorized to provide telecommunications services to the public</i>
Google Singapore Pte Ltd	Singapore
Infracore (Hong Kong) Limited	Hong Kong
Google Infraestrutura Brasil LTDA	Brazil
Google Cable Japan G.K.	Japan
Google Korea, LLC	South Korea

Google North America certifies that any change of control in the corporate reorganization was pro forma and did not, and will not, result in a change in the ultimate controlling shareholders of Google North America.

Please do not hesitate to contact me with any questions about this submission.

Respectfully submitted,

A handwritten signature in blue ink that reads "Megan Anne Stull". The signature is written in a cursive, flowing style.

Megan Anne Stull  
*Counsel to Google LLC*  
*Phone: 202-346-1208*  
*Email: [stull@google.com](mailto:stull@google.com)*