Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
China Unicom (Americas) Operations Limited	)	ITC File No. ITC-T/C-2011-_____
	)	
Notification of Pro Forma Transfer of Control of International Section 214 Authorizations Pursuant to Section 214 of the Communications Act of 1934, as Amended	)	

NOTIFICATION OF PRO FORMA TRANSFER OF CONTROL OF INTERNATIONAL SECTION 214 AUTHORIZATIONS

Pursuant to Section 214 of the Communications Act of 1934, as amended, ("the Act")[1], Sections 63.24(f) and 1.767(g)(7) of the Commission's rules,[2] China Unicom (Americas) Operations Limited ("CUA" or "Licensee") hereby notifies the Commission of the pro forma transfer of control of two international Section 214 authorizations[3] to Billion Express Investments Co., Ltd. ("Billion" or "Transferee"). The pro forma transfer of control occurred as part of an internal restructuring that took place on December 30, 2011. As a result of the restructuring, Billion, a BVI incorporated company became the direct owner of CUA. The restructuring did not change the ultimate ownership or control of CUA Accordingly, the transfer of control was pro forma in nature.

CUA regrets that it inadvertently did not notify the Commission of this internal reorganization in 2011 and has implemented certain internal procedures to ensure that any future

[1] 47 U.S.C. § 214.
[2] 47 C.F.R. §§ 63.24(f), 1.767(g).
[3] The two international Section 214 authorizations bear file numbers ITC-214-20020728-00361 and ITC-214-20020724-00427.

reorganizations are reviewed to determine whether they require a pro forma notification to the Commission. CUA acknowledged the missed filing in the June 2020 filing.[4] In addition, subsequent to the 2011 reorganization, CUA filed a pro forma notification with the Commission when the ownership of CUA was subsequently transferred to China Unicom Group Limited ("CUG") from Billion in 2017.[5] Billion was dissolved on April 25, 2017.

Pursuant to Section 63.24(f)(3) of the Commission's rules, CUA is filing a single notification for both of the international Section 214 authorizations. Below, CUA provides the information required by Sections 63.24(f)(2) and 63.18 (a)-(d) and (h) in respect of CUA's international section 214 authorizations.

I. DESCRIPTION OF THE TRANSACTION (ANSWER TO QUESTION 13)

As part of an internal reorganization control of CUA was transferred from China Unicom, (Hong Kong) Limited to its wholly-owned subsidiary Billion on December 30, 2011. Billion therefore became the new immediate parent of CUA.

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[4] *In re China Unicom (Americas) Operations Limited*, GN Docket No. 20-110, ITC-214-20020728-00361, ITC-214-20020724-00427, Response to Order to Show Cause, (June 1, 2020), p. 29.

[5] *In re China Unicom (Americas) Operations Limited*, ITC-T/C-20170301-00025, SCL-T/C-20170301-00004, Notification of Pro Forma Transfer of Control of International Section 214 Authorizations and a Submarine Cable Landing License, (Mar. 1, 2017).

II. INFORMATION REQUIRED BY SECTIONS 63.24(f)(2) AND 63.18 (a)-(d) AND (h) OF THE COMMISSION'S RULES

A. The name, address, and telephone number of the Transferee (Section 63.18(a))

Billion was dissolved on April 25, 2017. Correspondence regarding this notification can be sent to:

Wesley Haiqiang Liu
CHINA UNICOM (AMERICAS) OPERATIONS LIMITED
2355 Dulles Corner Blvd #688
Herndon, VA 20171
Telephone: + 1 703 880 6888
Email: liuhq1@chinaunicom.cn

B. The Government, State, or Territory under the laws of which the Transferee is organized (Section 63.18(b))

Billion was organized under the laws of the British Virgin Islands. As noted above, Billion was dissolved on April 25, 2017.

C. The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed (Section 63.18(c)) (Answer to Question 10)

Correspondence concerning this notification should be sent to:

Wesley Haiqiang Liu
CHINA UNICOM (AMERICAS) OPERATIONS LIMITED
2355 Dulles Corner Blvd #688
Herndon, VA 20171
Telephone: + 1 703 880 6888
Email: liuhq1@chinaunicom.cn

With a copy to:

Robert E. Stup, Jr.
SQUIRE PATTON BOGGS (US) LLP
2550 M Street NW
Washington, DC 20037
Telephone: (202) 626-6721
Email: robert.stup@squirepb.com

D. **A statement as to whether the transferee has previously received authority under Section 214 of the Act and, if so, a general description of the categories of facilities and services authorized (Section 63.18(d)) (Answer to Question 10)**

The Transferee, Billion, did not previously receive authority under Section 214 of the Act and never held any international Section 214 authorizations.

E. **The name, address, citizenship and principal businesses of any person or entity that directly or indirectly owns at least ten percent of the equity of the transferee, and the percentage of equity owned by each of those entities (Section 63.18(h)) (Answer to Question 11)**

At the time of the transaction, the following entities held a 10 percent or greater equity interest in the Transferee, which is shown in the second diagram contained in Exhibit A. No other person or entity directly or indirectly owns a 10 percent or greater equity interest in Billion.

Company Name	Citizenship	Registered Address	Principal Business	Effective Interest of Billion's Equity
State-owned Assets Supervision and Administration Commission of the State Council	People's Republic of China	No. 26, Xidajie, Xuanwumen, Xicheng District, Beijing, People's Republic of China	Government Authority	60.98%
China United Network Communications Group Company Limited	People's Republic of China	21 Financial Street, Xicheng District, Beijing, People's Republic of China	Telecommunications	61.94%
China United Network Communications Limited	People's Republic of China	25 Floor, 1033 Changning Road, Shanghai, People's Republic of China	Telecommunications	33.34%
China Unicom (BVI) Limited	British Virgin Islands	Craigmuir Chambers, P.O. Box 71, Road Town, Tortola, British Virgin Islands. (registered office)	Investment Holding	40.61%

Company Name	Citizenship	Registered Address	Principal Business	Effective Interest of Billion's Equity
China Unicom Group Corporation (BVI) Limited	British Virgin Islands	Commerce House, Wickhams Cay 1 P.O. Box 3140 Road Town Tortola VG1110 British Virgin Islands (registered office)	Investment Holding	33.75%
China Unicom (Hong Kong) Limited	Hong Kong	75th Floor, The Center, 99 Queen's Road Central, Hong Kong	Investment Holding	100%

F. **Interlocking directorates with a foreign carrier (Section 63.18(h) (Answer to Question 12)**

At the time of the transaction, Billion had the following interlocking directors/officers:

Interlocking Directorates	
Billion Officer and/or Director	**Position Held with Foreign Carrier, Name of Foreign Carrier, and Home Country in which Foreign Carrier is Authorized to Operate**
Ms. Meng Shusen Executive President	*Position Held with Foreign Carrier*: Director *Name of Foreign Carrier*: China Unicom (Hong Kong) Operations Limited *Home Country of Foreign Carrier*: Hong Kong *Position Held with Foreign Carrier*: Director *Name of Foreign Carrier*: China Unicom (Americas) Operations Limited *Home Country of Foreign Carrier*: United States of America *Position Held with Foreign Carrier*: Director *Name of Foreign Carrier*: China Unicom (Europe) Operations Limited *Home Country of Foreign Carrier*: United Kingdom *Position Held with Foreign Carrier*: Director *Name of Foreign Carrier*: China Unicom (Singapore) Operations Pte. Ltd. *Home Country of Foreign Carrier*: Singapore *Position Held with Foreign Carrier:* Director *Name of Foreign Carrier:* China Unicom (MYA) Operations Company Limited *Home Country of Foreign Carrier:* Myanmar

	Position Held with Foreign Carrier: Director *Name of Foreign Carrier*: China Unicom (Australia) Operations Pty. Ltd. *Home Country of Foreign Carrier*: Australia *Position Held with Foreign Carrier:* Director *Name of Foreign Carrier:* China Unicom (Japan) Operations Corporation *Home Country of Foreign Carrier:* Japan
Ms. Zhou Lisong Executive Vice President	*Position Held with Foreign Carrier*: Director *Name of Foreign Carrier:* China Unicom (Americas) Operations Limited *Home Country of Foreign Carrier*: United States of America
Mr. Ding Qiang Executive Vice President	*Position Held with Foreign Carrier:* Director *Name of Foreign Carrier*: China Unicom (Hong Kong) Operations Ltd. *Home Country of Foreign Carrier*: Hong Kong *Position Held with Foreign Carrier:* Director *Name of Foreign Carrier*: China Unicom (Singapore) Operations Pte. Ltd. *Home Country of Foreign Carrier*: Singapore *Position Held with Foreign Carrier:* Director *Name of Foreign Carrier*: China Unicom (Japan) Operations Corporation *Home Country of Foreign Carrier*: Japan *Position Held with Foreign Carrier*: Director *Name of Foreign Carrier*: China Unicom (MYA) Operations Company Limited *Home Country of Foreign Carrier*: Myanmar
Mr. Ma Yuerui Executive Vice President	*Position Held with Foreign Carrier*: Director *Name of Foreign Carrier*: China Unicom (Europe) Operations Ltd. *Home Country of Foreign Carrier*: United Kingdom
Mr. Xin Meng GM, Finance Department	*Position Held with Foreign Carrier:* Director *Name of Foreign Carrier*: China Unicom (Hong Kong) Operations Limited *Home Country of Foreign Carrier:* Hong Kong *Position Held with Foreign Carrier:* Director *Name of Foreign Carrier*: China Unicom (Americas) Operations Limited *Home Country of Foreign Carrier*: United States of America

G. Certification regarding pro forma status of the transaction (Section 63.24(f)(2)(ii))

Pursuant to the attached certifications in Exhibit B, CUA certifies that the transaction was pro forma and that, together with all previous pro forma transactions, did not result in a change in the ultimate controlling party.

III. CERTIFICATION REGARDING SERVICE TO U.S. COORDINATOR, DEPARTMENT OF STATE, NTIA, AND DEFENSE INFORMATION SYSTEMS AGENCY

As required by Section 1.767(j)[6] of the Commission's rules, a copy of this notification and its attachments has been sent to the U.S. Department of State, the U.S. Department of Commerce, and the Defense Information Systems Agency.

Respectfully submitted,

Robert E. Stup, Jr.
Caroline Howard
SQUIRE PATTON BOGGS (US) LLP
2550 M Street NW
Washington, DC 20037
Phone: (202) 626-6721
Email: robert.stup@squirepb.com
Counsel to China Unicom (Americas) Operations Limited and China Unicom Global Limited

Dated: September 8, 2021

[6] 47 C.F.R. § 1.767(j).

LIST OF EXHIBITS

EXHBIT A: BEFORE AND AFTER RESTRUCTURING DIAGRAMS

1. Shareholding Structure of China Unicom (Americas) Operations Limited (Before Restructuring)
2. Shareholding Structure of China Unicom (Americas) Operations Limited (After Restructuring)

EXHBIT B: CERTIFICATIONS

1. Certification on Behalf of CUA
2. Certificate of Service

A. Certification regarding pro forma status of the transaction (Sections 1.767(g)(7) and 63.24(f)(2))

Pursuant to the attached certifications in Exhibit B, CUA certifies that the transaction is pro forma and that, together with all previous pro forma transactions, will not result in a change in the ultimate controlling party. Billion is ultimately owned and controlled by the PRC government and control over CUA remains with the PRC government.

B. Anti-Drug Certification (Sections 1.767(a)(8)(i) and 63.18(o))

CUA certifies that pursuant to Sections 1.2001 through 1.2003 of the Commission's rules that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

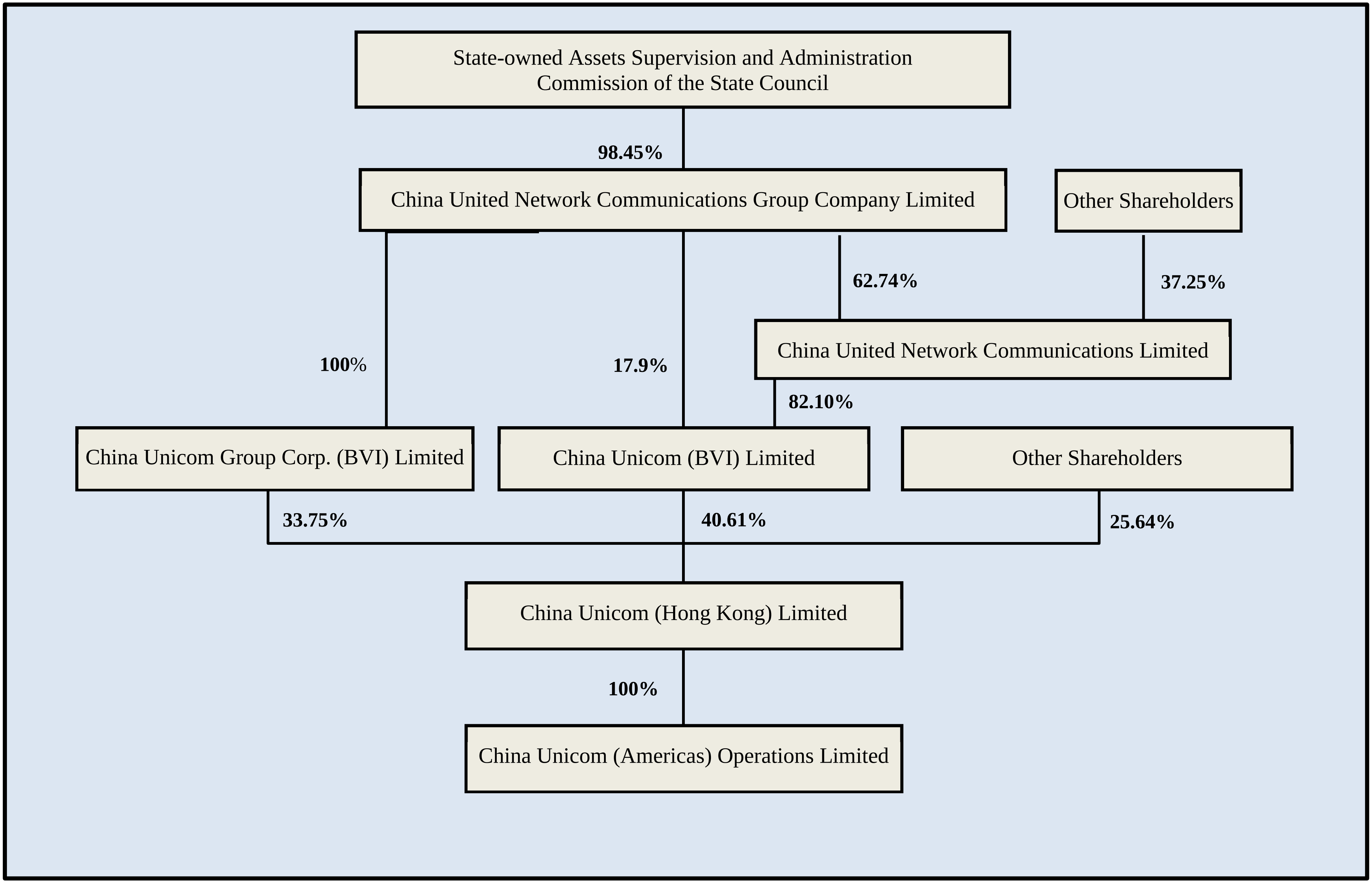
C. Certification Regarding Routine Conditions (Section 47 C.F.R. § 1.767(g))

CUA certifies that it both accepts and will abide by the routine conditions contained in Section 1.767(g)[7] of the Commission's rules.

[7] 47 C.F.R. § 1.767(g).

EXHIBIT A: BEFORE AND AFTER RESTRUCTURING DIAGRAMS

Shareholding Structure of China Unicom (Americas) Operations Limited (Before Restructuring)



Shareholding Structure of China Unicom (Americas) Operations Limited (After Restructuring)

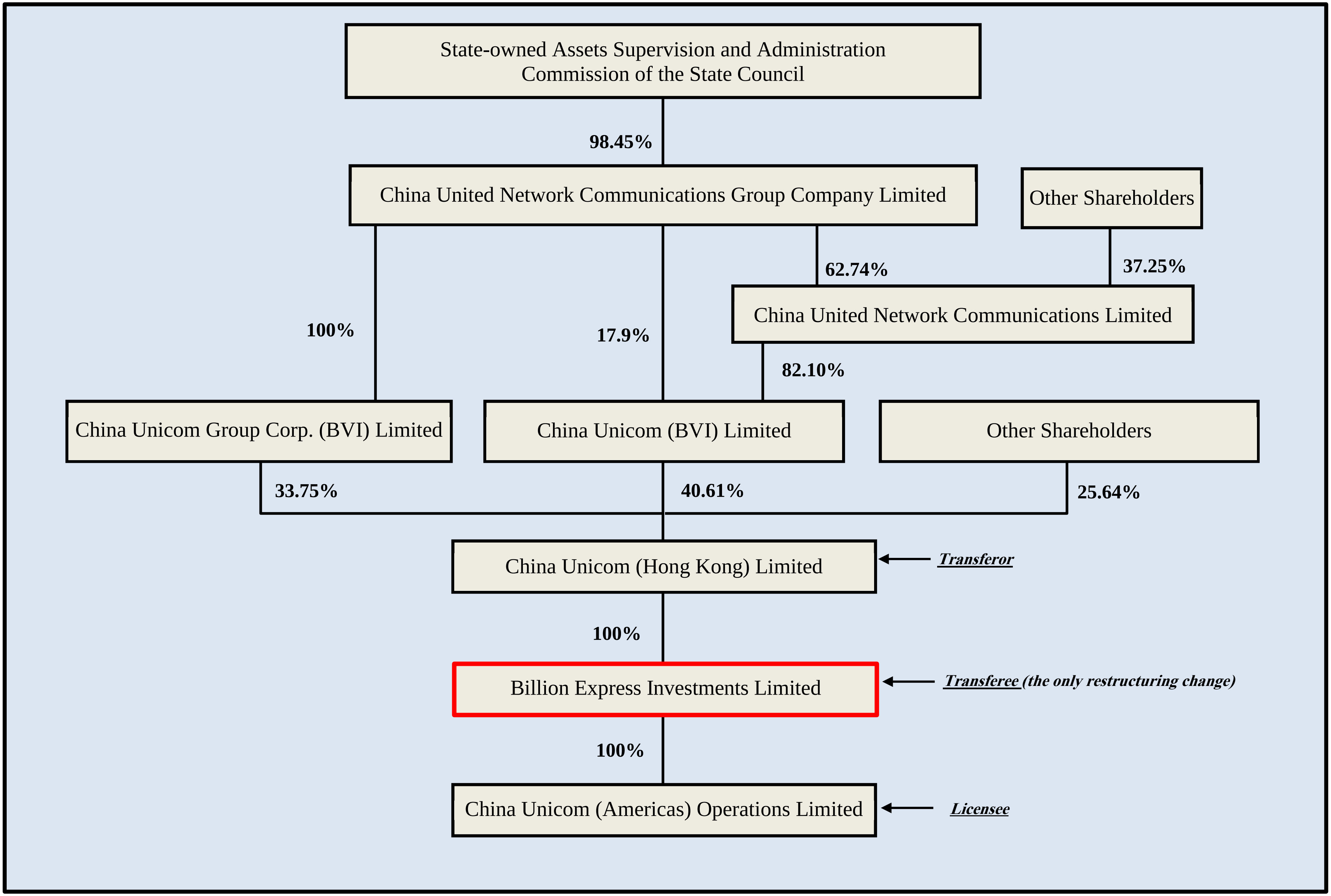


EXHIBIT B: CERTIFICATIONS

<u>Certification on Behalf of CUA</u>

On behalf of China Unicom (Americas) Operations Limited ("CUA"), I hereby certify under penalty of perjury that I am authorized to make this certification on behalf of CUA and that the foregoing notification of a pro forma transfer of control of two international Section 214 authorizations and an interest in a submarine cable landing license was prepared under my direction and supervision and is true and accurate to the best of my knowledge. The transfer of control was pro forma as defined in 47 C.F.R. § 63.24, and, taken together will all previous pro forma transactions, did not result in a change in the ultimate control of any of the licenses or authorizations held by CUA.

I declare under penalty of perjury that the foregoing is true and correct.

Wesley Haiqiang Liu
Secretary, Associate President
September 8, 2021

CERTIFICATE OF SERVICE

I, Caroline Howard, hereby certify that the foregoing notification was served on the following by first-class mail on September 8, 2021.

U.S. Coordinator
Office of International Communications & Information Policy
Bureau of Economic and Business Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520-5818

Office of Chief Counsel/NTIA
U.S. Department of Commerce
14th Street NW and Constitution Avenue NW
Washington, DC 20230

Defense Information Systems Agency
Attention: GC/DOI
6910 Cooper Avenue
Fort Meade, MD, 20755-7088

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