

**ATTACHMENT 1 TO FCC ELECTRONIC FORM  
FOR TRANSFER OF CONTROL OF  
INTERNATIONAL SECTION 214 AUTHORIZATIONS AND DOMESTIC  
SECTION 214 AUTHORITY**

Pursuant to Section 214 of the Communications Act of 1934, as amended, (“the Act”), 47 U.S.C. §214, and Section 63.24 of the Commission’s rules, 47 C.F.R. §63.24, AT&T Inc. (“AT&T” or “Transferor”) and Liberty Latin America Ltd. (“LLA” or “Transferee”) hereby request Commission consent to the transfer of control of the international Section 214 authorizations and domestic Section 214 authority held by AT&T Mobility Puerto Rico Inc. (“AT&T Mobility PR”) from AT&T to LLA.<sup>1</sup>

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

**Transferor Information:**

**AT&T Inc.**

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Room 3110  
Dallas, TX 75202  
Attention: G. Troy Hatch  
g.hatch@att.com  
Telephone: 214-757-3730

**with a copy to**

Peter J. Schildkraut  
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601 Massachusetts Avenue, NW  
Washington, DC 20001  
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Peter.Schildkraut@arnoldporter.com

**International Section 214 Authorizations:**

AT&T Inc. owns and controls AT&T Mobility PR, which holds the following international and domestic Section 214 authorizations which are the subject of this transfer of control application:

File Nos.:  
ITC-214-19930315-00040 (Global Resale Service);  
ITC-214-19940107-00011 (Global Resale Service);

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<sup>1</sup> AT&T and LLA (collectively “the Applicants”) are filing a total of two applications to transfer control of international Section 214 authorizations, one for AT&T Mobility Puerto Rico Inc. and one for AT&T Mobility USVI Inc.

ITC-214-19980918-00669 (Global Facilities-Based Service); and  
Blanket domestic Section 214 authority pursuant to 47 C.F.R. §63.01.

**Transferee Information:**

**Liberty Latin America Ltd.**

1550 Wewatta Street  
Suite 1000  
Denver, CO 80202  
Telephone: (303) 925-6000

**with a copy to**

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Timothy J. Fitzgibbon  
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**International Section 214 Authorizations:**

LLA does not hold an international Section 214 authorization. Certain subsidiaries of LLA hold the international Section 214 authorizations set forth below:

<b>Name of Authorized Carrier</b>	<b>File Number</b>	<b>Authority</b>
CWC New Cayman Limited	ITC-214-20100512-00191	Global or limited global facilities-based and resale service
Columbus Networks Telecommunications Services USA, Inc.	ITC-214-20070220-00077	Global or limited global facilities-based and resale service
Columbus Networks Puerto Rico Inc.	ITC-214-20091127-00497	Global or limited global facilities-based and resale service

A wholly-owned subsidiary of LLA, Liberty Cablevision of Puerto Rico LLC (“LCPR”), has applied for an international Section 214 authorization for global or limited global facilities-based and resale service. *See* Application File No. ITC-214-20170323-00053. LCPR’s application remains pending.

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

Upon completion of the proposed transaction, the following persons and/or entities are expected to have a shareholding greater than 10% of the voting and/or equity securities of LLA:

Dr. John C. Malone  
c/o 1550 Wewatta Street, Suite 1000  
Denver, Colorado 80202  
U.S. citizen  
Interest: Approximately 25.07 percent of LLA's aggregate voting power  
Principal business: telecommunications and investments

**Answer to Question 12 - Section 63.18(h)**

LLA Director Brendan Paddick is a Director of The Bahamas Telecommunications Company Limited.

**Answer to Question 13 - Narrative of the Transaction and Public Interest Statement.**

Please see Attachment 2.

**Answer to Question 14 - Section 63.18(i):**

LLA, the transferee, certifies that it is not a foreign carrier. LLA is affiliated with the foreign carriers (or their operating subsidiaries) listed below. Upon consummation of the proposed transaction, AT&T Mobility PR will become affiliated with such foreign carriers.

Country	Entity	Dominant Status?
Anguilla	Cable and Wireless (Anguilla) Limited	Y
Antigua & Barbuda	Cable & Wireless Antigua & Barbuda Limited	Y
	Kelcom International (Antigua & Barbuda) Ltd.	N
Bahamas	The Bahamas Telecommunications Company Limited	Y
	Columbus Communications Limited	N
Barbados	Cable & Wireless (Barbados) Limited	Y
	Columbus Telecommunications (Barbados) Limited	N
	Karib Cable Inc.	N
Belgium	Telenet Group Holding N.V.	N
Belize	ARCOS-1 USA, Inc.	N
Bonaire	Columbus Networks Bonaire, N.V.	N
British Virgin Islands	Cable and Wireless (British Virgin Islands) Limited	Y
Cayman Islands	Cable and Wireless (Cayman Islands) Limited	Y
Chile	VTR GlobalCom SpA	N
	Columbus Networks de Colombia, Ltda.	N

Country	Entity	Dominant Status?
Colombia	Columbus Networks Zona Franca Ltda.	N
	Lazus de Colombia S.A.S.	N
Costa Rica	Columbus Networks de Costa Rica S.R.L.	N
	Promitel Costa Rica S.A.	N
Curacao	Columbus Communications Curacao N.V.	N
	Columbus Networks Curacao, N.V.	N
	Columbus Networks Netherlands Antilles, N.V.	N
Dominica	Cable & Wireless Dominica Limited	Y
Dominican Republic	Columbus Networks Dominicana, S.A.	N
	CWC Cable & Wireless Communications Dominican Republic SA	Y
El Salvador	Columbus Networks Centroamerica, S. de R.L.	N
	Columbus Networks El Salvador S.A.	N
Grenada	Cable & Wireless Grenada Limited	Y
	Columbus Communications (Grenada) Limited	N
Guatemala	Columbus Networks de Guatemala Limitada	N
Honduras	Columbus Networks de Honduras, S. de R.L.	N
Ireland	Virgin Media Ireland Ltd	N
Jamaica	Cable & Wireless Jamaica Limited	Y
	Columbus Communications Jamaica Limited	N
	Columbus Networks Jamaica Limited	N
Mexico	Columbus Networks de Mexico S. de R.L. de C.V.	N
Montserrat	Cable and Wireless (West Indies) Limited	Y
Netherlands	VodafoneZiggo Group Holding BV	N
Nicaragua	Columbus Networks Nicaragua y Compania Limitada	N
Panama	Cable & Wireless Panama S.A.	Y
	CWC WS Holdings Panama S.A.	Y
	Columbus Networks de Panama S.R.L.	N
	Promitel Panama S.A.	N
Peru	Lazus Peru S.A.C.	N
Poland	UPC Polska Sp. z.o.o.	N
St. Kitts & Nevis	Cable & Wireless St. Kitts & Nevis Limited	Y
St. Lucia	Columbus Communications (St. Lucia) Limited	N
	Tele (St. Lucia) Inc.	N
	Cable & Wireless (St. Lucia) Limited	Y
St. Vincent & the Grenadines	Cable & Wireless St. Vincent and the Grenadines Limited	Y
	Columbus Communications St. Vincent and the Grenadines Limited	N
Slovak Republic	UPC Broadband Slovakia sro	N
Switzerland	UPC Schweiz GmbH	N
	Columbus Communications Trinidad Limited	N

Country	Entity	Dominant Status?
Trinidad and Tobago	Columbus Networks International (Trinidad) Limited	N
	Telecommunications Services of Trinidad and Tobago Limited	Y
Turks & Caicos Islands	Columbus Networks Limited	N
	Cable and Wireless (TCI) Limited	Y
United Kingdom	Virgin Media Operations Limited	N
Venezuela	Columbus Networks de Venezuela, S.A.	N

**Answer to Question 15 - Section 63.18(j)**

Upon consummation of the proposed transaction, international Section 214 authorization holder AT&T Mobility PR will be authorized to provide international telecommunications services to all destination points listed in response to Question 14.

**Answer to Question 16 - Section 63.10**

Pursuant to 47 C.F.R. §63.18(m), upon completion of the proposed transaction, AT&T Mobility PR will qualify for a presumption of non-dominant status on all international routes except those listed below, because each of its post-transaction foreign carrier affiliates (except those listed below) lacks 50 percent market share in the fixed local access and international transport markets on the foreign end of the route.

Destination Market	Affiliate
Anguilla	Cable and Wireless (Anguilla) Limited
Antigua and Barbuda	Cable & Wireless (Antigua and Barbuda) Ltd.
Bahamas	The Bahamas Telecommunications Company Limited
Barbados	Cable & Wireless (Barbados) Ltd.
British Virgin Islands	Cable & Wireless (British Virgin Islands) Ltd.
Cayman Islands	Cable & Wireless (Cayman Islands) Ltd.
Dominica	Cable & Wireless Dominica Limited
Dominican Republic	CWC Cable & Wireless Communications Dominican Republic SA
Grenada	Cable & Wireless Grenada Ltd.
Jamaica	Cable & Wireless Jamaica Ltd.
Montserrat	Cable & Wireless (West Indies) Ltd.
Panama	Cable & Wireless Panama S.A.
Panama	CWC WS Holdings Panama S.A.
St Kitts & Nevis	Cable & Wireless (St. Kitts and Nevis) Ltd.
St. Lucia	Cable & Wireless (St. Lucia) Limited
St. Vincent/Grenadines	Cable & Wireless (St. Vincent and the Grenadines) Ltd.
Trinidad & Tobago	Telecommunications Services of Trinidad & Tobago Limited

Destination Market	Affiliate
Turks and Caicos	Cable and Wireless (TCI) Ltd.

**Answer to Question 18 - Section 63.18(k)**

Although Bahamas is in the process of acceding to the World Trade Organization (“WTO”), it is not yet a member.<sup>2</sup> The other countries identified in Question 15 are WTO members.<sup>3</sup>

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<sup>2</sup> See World Trade Organization, Bahamas—Accession Status (last visited Oct. 30, 2019), [https://www.wto.org/english/thewto\\_e/acc\\_e/a1\\_bahamas\\_e.htm](https://www.wto.org/english/thewto_e/acc_e/a1_bahamas_e.htm).

<sup>3</sup> The FCC has treated the British overseas territories as WTO Members. See Letter from Robert E. Dalton, Assistant Legal Adviser for Treaty Affairs, United States Department of State, to Rebecca Arbogast, Telecommunications Division, International Bureau, Federal Communications Commission (Feb. 16, 2000), at 1, cited in *Cable & Wireless USA, Inc. Application for Authority to Operate as a Facilities-Based Carrier in Accordance with the Provisions of Section 63.18(e)(4) of the Rules Between the United States and Bermuda*, Authorization and Certificate, 15 FCC Rcd. 3050 (Int’l Bur 2000), at ¶7.