

APPENDIX C:

FRANCE TELECOM LONG DISTANCE USA, LLC D/B/A ORANGE CARRIERS USA, DISCLOSURES AND CERTIFICATIONS

1. Applicant's Name, Address, Telephone Number, and Place of Organization⁶¹

In Table C-1 below, France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA ("OCUSA") provides its address, telephone number, place of organization, and FCC Registration Number ("FRN").

Table C-1: Applicant Information

Name, Address, Telephone Number	Place of Organization	FRN
France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA 11921 Freedom Drive, Suite 720 Reston, Virginia 20190. +1 703 471 2458	Delaware	0016295008

B. Contact Information⁶²

The Commission should address correspondence regarding this application to the persons noted in Table C-2 below:

⁶¹ 47 C.F.R. § 1.767(a)(1), (2).

⁶² *Id.* § 1.767(a)(3).

Table C-2: Applicant Contact Information

Company Officer Contact
Danielle Aguto Secretary 11921 Freedom Drive, Suite 720 Reston, Virginia 20190 +1 703 471 2458 danielle.aguto@orange.com

2. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶³

OCUSA certifies that it has the following 10-percent-or-greater interest holders:

Orange Participations Holding Inc. (“OPH”)

Address: 11921 Freedom Drive, Suite 720, Reston, Virginia 20190

Place of Organization: Delaware

Principal Business: holding company

Interest Held: OPH holds a 100-percent voting and equity interest in OCUSA.

Orange Participations U.S. Inc. (“OPUS”)

Address: 11921 Freedom Drive, Suite 720, Reston, Virginia 20190.

Place of Organization: Delaware

Principal Business: holding company

Interest Held: OPUS holds a 100-percent voting and equity interest in OPH, giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 100-percent voting and equity interest in OCUSA.

Orange S.A. (“Orange Parent”)

Address: 111, quai du Président Roosevelt, 92449 Issy les Moulineaux Cedex, France

Place of Organization: France

Principal Business: telecommunications

Interest Held: Orange Parent holds a 100-percent voting and equity interest in OPUS, giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 100-percent voting and equity interest in OCUSA.

The French State

Address: 2 Agence des Participations de l’Etat Ministère de l’Economie, des Finances et de la Relance 139, rue de Bercy 75572 Paris Cedex 12, France

Place of Organization: France

Principal Business: government

⁶³ *Id.* §§ 1.767(a)(8)(i), 63.18(h).

Interest Held: The French State holds a 21-percent voting interest and a 13-percent equity interest in Orange Parent, giving it (under the Commission's ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 21-percent voting interest and a 13-percent equity interest in OCUSA.

Orange Group Savings Plan

Address: AMUNDI ESR 26956 Valence Cedex 9, France

Place of Organization: France

Principal Business: employee savings plan

Interest Held: Orange Group Savings Plan (through its management of the Orange Actions and Orange Ambition International mutual funds and shares held directly by employees in registered form) holds a 13-percent voting interest and an 8-percent equity interest in Orange Parent, giving it (under the Commission's ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 13-percent voting interest and a 8-percent equity interest in OCUSA.

Other than the entities and persons noted above, no entity holds a 10-percent-or-greater direct or indirect voting or equity interest in OCUSA. The ownership structure of OCUSA is shown in Exhibit C-1.

OCUSA certifies that it has no interlocking directorates with foreign carriers.

3. Anti-Drug Abuse Act Certification⁶⁴

OCUSA certifies that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁶⁵

4. Law Enforcement Certifications⁶⁶

OCUSA certifies that it will:

⁶⁴ *Id.* § 1.767(a)(8)(i), 63.18(o).

⁶⁵ *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

⁶⁶ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that CELIA system will operate on a non-common carrier basis);⁶⁷
- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);⁶⁸
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

Name: Thiago Pereira

Title: Head of Network & Services Planning - Americas

Address: Orange Business Services, 100 Galleria Parkway SE, Suite 300, Atlanta Georgia 30339

Office telephone: +1 678 346 3665

Mobile telephone: +1 678 446 7797

Email: thiago.pereira@orange.com

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;⁶⁹

⁶⁷ *Id.* § 63.18(q)(1)(i).

⁶⁸ *Id.* § 63.18(q)(1)(ii).

⁶⁹ *Id.* § 63.18(q)(1)(iv)(B).

- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;⁷⁰ and
- Acknowledge that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q), or in the grant of an application or authorization, and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.⁷¹

5. Certification Regarding Foreign Carrier Status and Foreign Affiliations⁷²

OCUSA certifies that it (A) is not a foreign carrier in Antigua and Barbuda, Martinique, or Aruba, the six foreign destination countries in which the CELIA system will land; (B) does not own or control a CLS in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; and (C) is affiliated with foreign carriers, including foreign carriers that own or control CLSs in Martinique, as noted in Table C-3 below.

**Table C-3:
Affiliated Foreign Carriers and CLS Interests**

Country	Entity	Owns/ Controls CLS
Argentina	Orange Business Services Argentina S.A.	N

⁷⁰ *Id.* § 63.18(q)(v).

⁷¹ *Id.* § 63.18(q)(iv)(A).

⁷² *Id.* § 1.767(a)(8)(ii).

Country	Entity	Owns/ Controls CLS
Australia	Orange Business Services Australia Pty Ltd	N
Austria	Orange Business Austria GmbH	N
Bahrain	EGN B.V. EQUANT GLOBAL NETWORK (Foreign Branch)	N
Belgium	Orange Belgium	N
	Orange Business Belgium S.A.	N
Botswana	Orange Botswana	N
Brazil	Orange Business Services Brasil Ltda	N
Bulgaria	Equant Bulgaria Ltd.	N
Burkina Faso	Orange Burkina Faso	N
Cameroon	Orange Cameroon	N
Canada	Orange Business Services Canada Inc.	N
Central African Republic	Orange Centrafrique	N
Chile	Orange Business Services Chile, S.A.	N
Colombia	Orange Business Services Colombia S.A.S.	N
Congo	Orange RDC	Y
Côte d'Ivoire	Orange Business Services Côte d'Ivoire	N
	Orange Côte d'Ivoire	Y
Czech Rep.	Orange Business Czech Republic s.r.o.	N
Denmark	Orange Business Denmark A/S	N
Egypt	Equant Egypt for Communications S.A.E.	N
Finland	Orange Business Finland Oy	N
France	GlobeCast and Globecast Reportages	N
France	Orange Parent	Y
French Guiana	Orange Parent	Y
Georgia	Equant Georgia Limited	N
Germany	Orange Business Germany GmbH	N
Ghana	Equant Ghana Ltd.	N
Greece	Orange Business Communications Hellas. S.A.	N
Guadeloupe	Orange Parent	Y
Guinea	Orange Guinée Conakry	Y through SPV GUILAB
Guinea-Bissau	Orange Bissau	Y through SPV SCGB
Hong Kong	Globecast Hong Kong Ltd	N
	Orange Business Services Hong Kong Limited	N
Hungary	Orange Business Services Hungary Kft.	N

Country	Entity	Owns/ Controls CLS
India	Orange Business Services India Network Private Limited	N
	Globecast India Ltd	N
Ireland	Orange Business Telecommunications Services Ltd	N
Israel	France Telecom Israel	N
Italy	Orange Business Italy s.p.a.	N
Italy	Globecast Italia SRL	N
Japan	Orange Business Services Japan Co., Ltd.	N
Jordan	Jordan Telecommunications Company	N
Kazakhstan	Orange Business Kazakhstan LLP	N
Liberia	Orange Liberia	Y through SPV CCL
Luxembourg	Orange Business Luxembourg S.A.	N
	Orange Communications Luxembourg	N
Madagascar	Orange Madagascar	Y
Malaysia	Orange Business Services Malaysia Sdn. Bhd.	N
	Orange Business Services (Network) Sdn. Bhd.	N
Mali	Orange Mali	N
Martinique	Orange Parent	Y
Mauritius	Mauritius Telecom	Y
	Orange Business Services Mauritius Limited	N
Mayotte	Orange Parent	Y
Mexico	Orange Business Services Mexico. S.A. de C.V.	N
Moldova	Orange Moldova	N
Morocco	Méditel	N (under construction)
	Orange Business Maroc SARL	N
Netherlands	Orange Business Netherlands B.V.	N
New Zealand	Orange Business Services New Zealand Limited	N
Nigeria	Orange Business Communications Services Nigeria Ltd.	N
Norway	Orange Business Norway AS	N
Pakistan	Equant Pakistan (Private) Limited	N
Peru	Equant Peru S.A.	N
Poland	Orange Polska	Y
Portugal	Orange Business Portugal S.A.	N
Reunion	Orange S.A.	Y
Republic of Korea	Orange Business Services Korea Limited	N
Romania	Orange Business Romania S.A.	N
	Orange Romania	N
Russian Federation	Limited Liability Company “Orange Business Services”	N
	Globecast Moskva LLP	N

Country	Entity	Owens/ Controls CLS
Saint-Barthélemy	Orange S.A.	N
St. Pierre and Miquelon	SPM Telecom SAS	N
Senegal	Societe Nationale des Telecommunications	Y
Sierra Leone	Orange (SL) Limited	Y through SPV SALCAB
Singapore	Orange Business Services Singapore Pte, Ltd	N
Singapore	Globecast Asia Ltd	N
Slovakia	Orange Business Services Slovakia s.r.o.	N
Slovakia	Orange Slovensko	N
South Africa	Globecast South Africa PTY Ltd	N
South Africa	Orange Business Services South Africa (PTY) Ltd.	N
Spain	Orange Business Spain SAU	N
	Orange Espagne S.A. MasOrange	N
Sweden	Orange Business Sweden AB	N
Switzerland	Orange Business Switzerland AG	N
Taiwan	Orange Business Services Hong Kong Limited (Taiwan Branch)	N
Thailand	Orange Business Services (Thailand) Ltd.	N
Tunisia	Orange Tunisie	Y
Turkey	Orange Business Turkey Bilisim Anonim Sirketi	N
Ukraine	Orange Business Services Ukraine LLC	N
United Kingdom	Orange Business Holdings UK Limited	N
	Globecast UK Ltd	N
Venezuela	Equant Venezuela, S.A.	N
Wallis and Futuna	Orange Wallis et Futuna	N

6. Certification Regarding Foreign Destination Countries⁷³

OCUSA certifies that: (A) it is not a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire, the six foreign destination countries in which the Applicants seek to land and operate the CELIA system; (B) it does not control a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; (C) an

⁷³ *Id.* § 1.767(a)(8)(iii).

entity owning more than 25 percent of it or controlling it (Orange Parent) controls foreign carriers in Martinique and Saint-Barthélemy; and (D) no grouping of two or more foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire (or parties that control foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the CELIA system in the United States.

7. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries⁷⁴

No response is required, as OCUSA has not identified any non-WTO member countries in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

8. Certification Regarding Routine Conditions⁷⁵

OCUSA certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

9. Streamlining⁷⁶

OCUSA qualifies for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3). It certifies that it is affiliated with a foreign carrier in Martinique having a 50-percent-or-greater market share in the international-transport and local access markets. OCUSA agrees to comply with the reporting requirements specified in 47 C.F.R. § 1.767(l).

⁷⁴ *Id.* § 1.767(a)(8)(iv).

⁷⁵ *Id.* § 1.767(a)(9).

⁷⁶ *Id.* § 1.767(k).

OCUSA certifies that the application qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Florida—the only state in which the CELIA system will land—does not list a cable landing license as a federal activity requiring a consistency certification.⁷⁷

[Signature on following page]

⁷⁷ See Florida's Federal Listed Actions,
<https://coast.noaa.gov/data/czm/consistency/media/fl.pdf>.

Respectfully submitted,

**France Telecom Long Distance USA, LLC
d/b/a Orange Carriers USA**

A handwritten signature in black ink, appearing to be 'D. Pugin', with a horizontal line extending to the right.

David Pugin
President
France Telecom Long Distance USA, LLC
d/b/a Orange Carriers USA
11921 Freedom Drive, Suite 720
Reston, Virginia 20190

July 25, 2025

EXHIBIT C-1:

**Ownership Structure of France Telecom Long Distance USA, LLC
d/b/a Orange Carriers USA**

