

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Verizon Business Global LLC, Assignor) File No. SCL-_____)
)
and)
)
MCI Communications Corporation, Assignee)

Application for *Pro Forma* Assignment
of Cable Landing Licenses

To: Chief, International Bureau

**APPLICATION FOR *PRO FORMA* ASSIGNMENT
OF CABLE LANDING LICENSE**

Pursuant to an Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39, and Section 1.767 of the Commission’s Rules, 47 C.F.R. § 1.767, Verizon Business Global LLC (“Verizon Business Global”) and MCI Communications Corporation request Federal Communications Commission (“Commission” or “FCC”) consent to the *pro forma* assignment of Verizon Business Global’s 7.35% interest in the MAYA-1 submarine cable, File No. SCL-MOD-20110928-00028, to its wholly owned subsidiary, MCI Communications Corporation, as part of a planned internal corporate restructuring involving certain wholly owned subsidiaries of Verizon.

Description of Transaction and Public Interest Statement

As part of a proposed internal restructuring, Verizon seeks to assign all of the FCC licenses and authorizations held by Verizon Business Global to Verizon Business Global’s

wholly owned subsidiary, MCI Communications Corporation.¹ This restructuring is scheduled to occur on or after December 28, 2015.

Verizon Business Global and MCI Communications Corporation are both wholly owned subsidiaries of Verizon. Because the proposed assignment will not change the ultimate control of the submarine cable interest at issue (it will remain controlled by Verizon), it is *pro forma* in nature.² The Commission has stated that, in situations “where no substantial change of control will result from the transfer or assignment, grant of the application is deemed presumptively in the public interest.”³ In fact, *pro forma* assignments and transfers of control of submarine cable licenses granted after the effective date of the SCL Transfer Order require only a post-closing notification.⁴ Because the submarine cable license at issue in this application was granted prior to the SCL Transfer Order, however, Verizon submits them to the FCC for review and approval in advance of the restructuring. Thus, Verizon Business Global and MCI Communications Corporation request that the Commission expeditiously grant this application.

¹ Verizon Business Global also holds a submarine cable license that includes the *pro forma* condition, which allows post-closing notification for *pro forma* assignments and transfers of control. *Review of Commission Consideration of Applications Under Cable Landing License Act*, Memorandum Opinion and Order, 13 FCC Rcd. 22167, 22199 ¶ 61 (2001) (“SCL Transfer Order”). Verizon will file a post-closing notification for this submarine cable in compliance with Section 1.767(g)(7) of the Commission’s rules, 47 C.F.R. § 1.767(g)(7). In addition, Verizon Business Global also holds international Section 214 authorizations which are being assigned. A post-closing notification for the assignment of these authorizations will be filed after the restructuring occurs. 47 C.F.R. § 63.24(f).

² *In re Fed. Communications Bar Ass’n’s Petition for Forbearance from Section 310(d) of the Communications Act Regarding Non-Substantial Assignments of Wireless Licenses & Transfers of Control Involving Telecomms. Carriers*, Memorandum Opinion and Order, 13 FCC Rcd. 6293, 6299, ¶ 8 (1998) (“*FCBA Forbearance Order*”) (“corporate reorganization which involves no substantial change in the beneficial ownership of the corporation” is *pro forma* in nature); *cf.* 47 C.F.R. § 63.24(d).

³ *Id.* at 6295, ¶ 2. *See also 1998 Biennial Review – Review of International Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999) (finding 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.”); SCL Transfer Order, 13 FCC Rcd at 22199 ¶ 61 (citing 47 C.F.R. § 63.24).

⁴ 47 C.F.R. § 1.767(g)(7).

Below is the information required pursuant to Section 1.767 of the Commission's rules.

Assignor/Assignee Information in Response to Section 1.767(a)(1)-(3):

Correspondence concerning this application should be sent to:

Katharine R. Saunders
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1320 N. Courthouse Rd.
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Arlington, VA 22201
Telephone: (703) 351-3097
Email: katharine.saunders@verizon.com

with a copy to:

Nancy J. Victory
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1776 K Street, NW
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Place of Formation: Verizon and MCI Communications Corporation are Delaware corporations. Verizon Business Global is a Delaware limited liability company.

Assignee Information in Response to Section 1.767(a)(8)-(9):

Section 1.767(a)(8)(i):

Section 63.18(h). MCI Communications Corporation, the assignee, which is located at One Verizon Way, Basking Ridge, NJ 07920, is wholly owned by Verizon Business Global, which is also located at One Verizon Way, Basking Ridge, NJ 07920. Verizon Business Global is wholly owned by Verizon, with its primary address at 1095 Avenue of the Americas, New York, NY 10036. Verizon is a publicly traded company with no person or entity known to own ten percent or more of the company's outstanding stock.

Verizon, MCI Communications Corporation, and Verizon Business Global do not have any interlocking directorates with a foreign carrier.

Section 63.18(o). Verizon certifies that no party to this notification is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

Section 1.767(a)(8)(ii):

MCI Communications Corporation, through its ownership by Verizon, is affiliated with the following foreign carriers:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Verizon Albania ShPk	Albania
Verizon Argentina S.R.L.	Argentina
Verizon Australia Pty Limited	Australia
Verizon Austria GmbH	Austria
NV Verizon Belgium Luxembourg S.A.	Belgium, Luxembourg
Verizon Telecomunicações do Brasil Ltda	Brazil
Verizon Bulgaria EOOD	Bulgaria
Verizon Canada Ltd.	Canada
Verizon Chile S.A.	Chile
Verizon Colombia S.A.	Colombia
Verizon Czech s.r.o.	Czech Republic
Verizon Denmark A/S	Denmark
Verizon Finland Oy	Finland
Verizon France SAS	France
Verizon Deutschland GmbH	Germany
Verizon Hellas Telecommunications Single Member LLC	Greece
Verizon Hong Kong Limited	Hong Kong
Verizon Hungary Telecommunications LLC	Hungary
Verizon India Private Limited	India
Verizon Ireland Limited	Ireland
Verizon Italia S.p.A.	Italy
Verizon Japan Limited	Japan
Verizon Korea Limited	Korea
Verizon Servicios Empresariales Mexico, S de R. L. de C.V.	Mexico
Verizon Nederland BV	Netherlands
Verizon New Zealand Limited	New Zealand
Verizon Norway AS	Norway
Verizon Panama S.A.	Panama
Verizon Peru SRL	Peru
Verizon Polska Sp. Z.o.o.	Poland
Verizon Portugal Sociedade Unipessoal, LDA	Portugal

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Verizon Romania SRL	Romania
Verizon Communications Singapore Pte. Ltd.	Singapore
Verizon Communications Slovakia s.r.o.	Slovakia
Verizon South Africa (Pty) Limited	South Africa
Verizon Spain S.L.	Spain
Verizon Sweden AB	Sweden
Verizon Switzerland AG	Switzerland
Verizon Taiwan Co. Limited	Taiwan (Chinese Taipei)
Verizon UK Limited	United Kingdom
Verizon Venezuela, S.A.	Venezuela

Section 1.767(a)(8)(iii):

The Verizon foreign carrier affiliates identified above provide service to the countries listed.

Section 1.767(a)(8)(iv):

All of the above-listed countries are WTO member countries.

Section 1.767(a)(9):

Verizon’s licensees affected here certify that they will accept and will abide by the routine conditions specified at Section 1.767(g) of the Commission’s Rules.

Pro Forma Certification and Eligibility for Streamlined Processing

The Applicants certify that the assignment is *pro forma* and does not result in a change in the actual controlling party of the MAYA-1 submarine cable interest.⁵

This application is eligible for streamlined processing. The *pro forma* assignment application creates no new foreign carrier affiliations for Verizon. The Commission has previously reviewed Verizon’s foreign carrier affiliates. The Commission has not found that any

⁵ See 47 C.F.R. §§ 1.767(g)(7), 63.24(f)(2)(ii).

of Verizon's foreign carrier affiliates possess market power.⁶ These foreign carriers lack 50 percent market share in the international transport and the local access markets in the destination markets where they provide services. None of these foreign carriers is listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.

The undersigned certifies that all statements made in this notification and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, are made in good faith, and based on reasonable investigation and belief, are true, complete, and correct.

Respectfully submitted,

/s/ William H. Johnson _____

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⁶ See *Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18433, ¶ 179 (2005); *Verizon Wireless and Atlantis Holdings LLC (Transfer of Control)*, Memorandum Opinion and Order and Declaratory Ruling, 23 FCC Rcd 17444 (2008); *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00105, DA 09-1049 (May 14, 2009); *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00106, DA 10-1065 (June 14, 2010); *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00111, DA 12-1973 (Dec. 7, 2012).