



January 13, 2017

Nicholas G. Alexander
Associate General Counsel, Federal Affairs
1220 L Street NW, Suite #660
Washington, DC 20005
TEL: (571) 730-6473
Nick.Alexander@Level3.com

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Pro Forma Assignment and Transfer of Control of Global Crossing Americas Solutions, Inc.

Dear Ms. Dortch:

By this letter, Level 3 Communications, Inc. provides notice pursuant to 47 CFR § 1.767(g)(7) that a pro forma assignment and a contemporaneous pro forma transfer of control of Global Crossing Americas Solutions, Inc. occurred as part of a corporate reorganization on December 31, 2016. Global Crossing Americas Solutions, Inc. is a licensee on the Americas II consortium submarine cable, SCL-LIC-19980430-00006.

The pro forma assignment occurred when Global Crossing Americas Solutions, Inc., a Delaware corporation, was converted to Global Crossing Americas Solutions, LLC (GCAS, LLC), a Delaware limited liability company.

The pro forma transfer of control occurred contemporaneously with the pro forma assignment, when:

(a) GCAS, LLC's direct parent, Impsat Fiber Networks, Inc., a Delaware corporation, was converted to Impsat Fiber Networks, LLC (Impsat, LLC), a Delaware limited liability company; and

(b) Impsat, LLC transferred 100% of its interest in GCAS, LLC to Level 3 Communications, LLC. Impsat, LLC and Level 3 Communications, LLC both are indirect subsidiaries of Level 3 Communications, Inc., which held ultimate control of GCAS, LLC both before and after the pro forma transfer of control.

Pre- and post-*pro forma* transaction organizational charts reflecting the changes described above are set forth in Exhibit 1.

GCAS, LLC's contact information is as follows:

Nicholas G. Alexander
Associate General Counsel
Level 3 Communications LLC
1220 L Street, Suite 660
Washington, DC 20005
+571-730-6473 tel

GCAS, LLC is a Delaware limited liability company, engaged in the business of telecommunications. The name, address, citizenship, and principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of GCAS, LLC, and the percentage of equity owned by each of those persons or entities (to the nearest one percent), is as follows:

GCAS, LLC is 100% owned by Level 3 Communications, LLC.

Level 3 Communications, LLC

Address: 1025 Eldorado Boulevard
Broomfield, Colorado 80021
Citizenship: Delaware
Principal Business: telecommunications
Relationship: Level 3 Communications, LLC owns 100 percent of GCAS, LLC

Level 3 Financing, Inc.

Address: 1025 Eldorado Boulevard
Broomfield, Colorado 80021
Citizenship: Delaware
Principal Business: holding company
Relationship: Level 3 Financing, Inc. owns 100 percent of Level 3 Communications, LLC

Level 3 Communications, Inc.

Address: 1025 Eldorado Boulevard
Broomfield, Colorado 80021
Citizenship: Delaware
Principal Business: holding company
Relationship: Level 3 Communications, Inc. owns 100 percent of Level 3 Financing, Inc.

STT Crossing Ltd currently holds approximately 18.1% of Level 3 Communications, Inc. No other entity directly or indirectly owns at least ten percent of the equity of Level 3 Communications, Inc. Information regarding STT Crossing Ltd and its ownership is as follows:

STT Crossing Ltd (“STT Crossing”)

Address: Les Cascades Building, Edith Cavell Street, Port Louis,
Mauritius
Citizenship: Mauritius
Principal Business: holding company
Relationship: STT Crossing owns approximately 18.1 percent of Level 3 Communications, Inc.

STT Communications Ltd (“STT Communications”)

Address: 1 Temasek Avenue, #33-01 Millenia Tower, Singapore 039192
Citizenship: Singapore
Principal Business: information communications
Relationship: STT Communications owns 100 percent of STT Crossing.

Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”)

Address: 1 Temasek Avenue, #33-01 Millenia Tower, Singapore 039192
Citizenship: Singapore
Principal Business: investment holding company
Relationship: ST Telemedia owns 100 percent of STT Communications.

Temasek Holdings (Private) Limited (“Temasek”)

Address: 60B Orchard Road #06-18, The Atrium@Orchard, Singapore 238891
Citizenship: Singapore
Principal Business: investment holding company
Relationship: Temasek owns 100 percent of ST Telemedia.

Temasek is wholly owned by the Government of Singapore through the Minister for Finance.

By the attached certification, Level 3 Communications, LLC certifies that the assignment and the transfer of control were *pro forma*, as defined in 47 CFR § 63.24, and, together with all previous *pro forma* transactions, did not result in a change of GCAS, LLC's ultimate control.

Please contact the undersigned at 571-730-6473 or by email at Nick.Alexander@level3.com with any questions regarding this notification.

Sincerely,



Nicholas G. Alexander

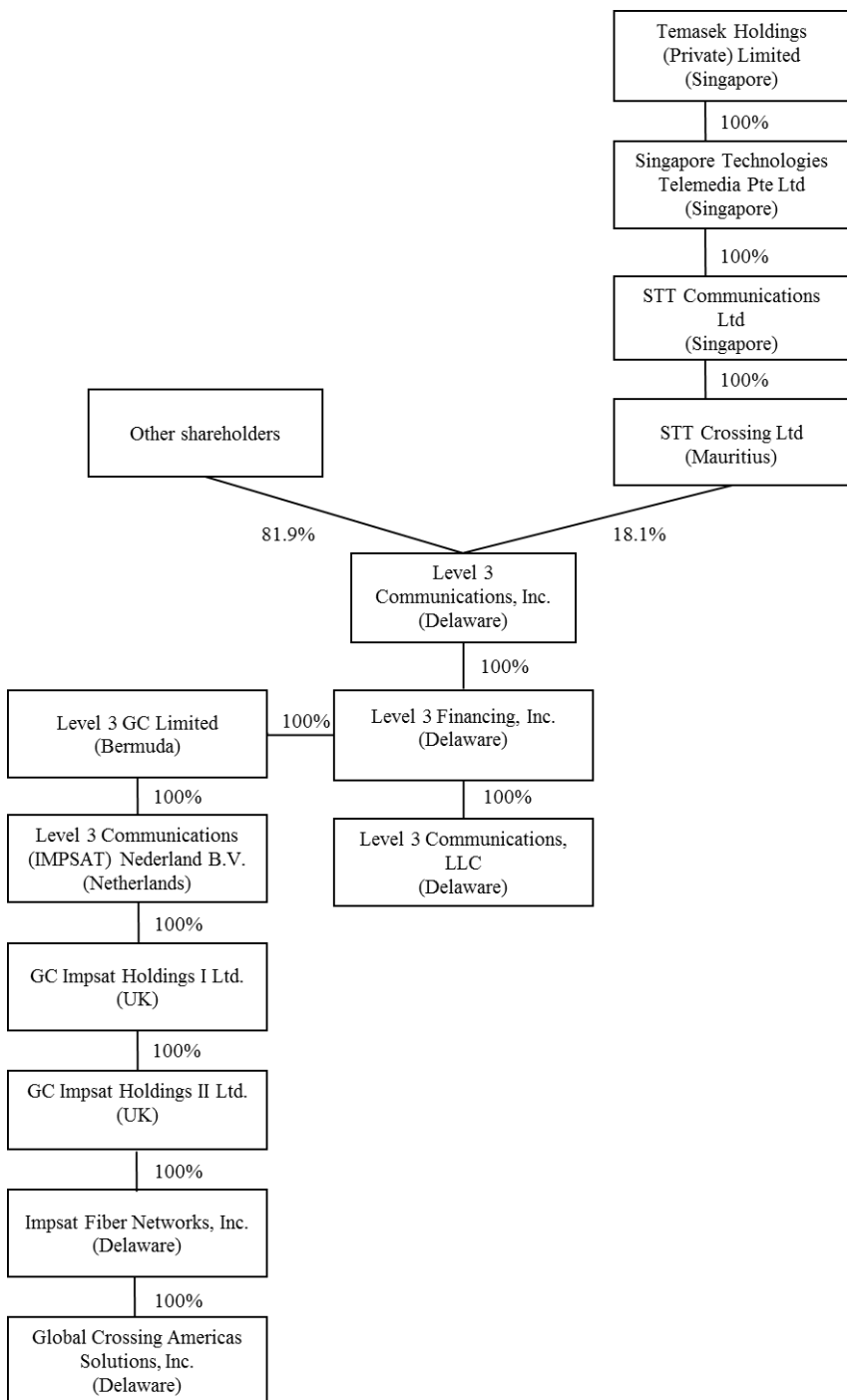
enclosures

cc: David Krech, David.Krech@fcc.gov
Denise Coca, Denise.Coca@fcc.gov
Shawn Cooley: shawn.cooley@HQ.DHS.GOV
Janine Slade: janine.slade@hq.dhs.gov
Joanne Ongman: Joanne.Ongman@usdoj.gov
Louis Blazy: Louis.Blazy@usdoj.gov
Harry Juricic: harry.juricic.civ@mail.mil
Richard Gault: richard.w.gault2.ctr@mail.mil
Michael Bollerman: michael.bollerman.ctr@mail.mil
RJ Arneson: rjarneson.dod@gmail.com
Jordan Richie: Jordan.s.richie.civ@mail.mil
Daniela Murch: daniela.murch@hq.dhs.gov
Dan Wunderli: daniel.wunderli@ic.fbi.gov
DHS reflector: IP-FCC@HQ.DHS.GOV
DOJ reflector: FIRS-TT@usdoj.gov
DOD reflector: cfius.monitoring@osd.mil
Danny Sepulveda: sepulvedada@state.gov
Doug May: maydc@state.gov
Joe Burton: burtonkj@state.gov
Kathy Smith: ksmith@ntia.doc.gov
William Brazis: william.e.brazis.civ@mail.mil

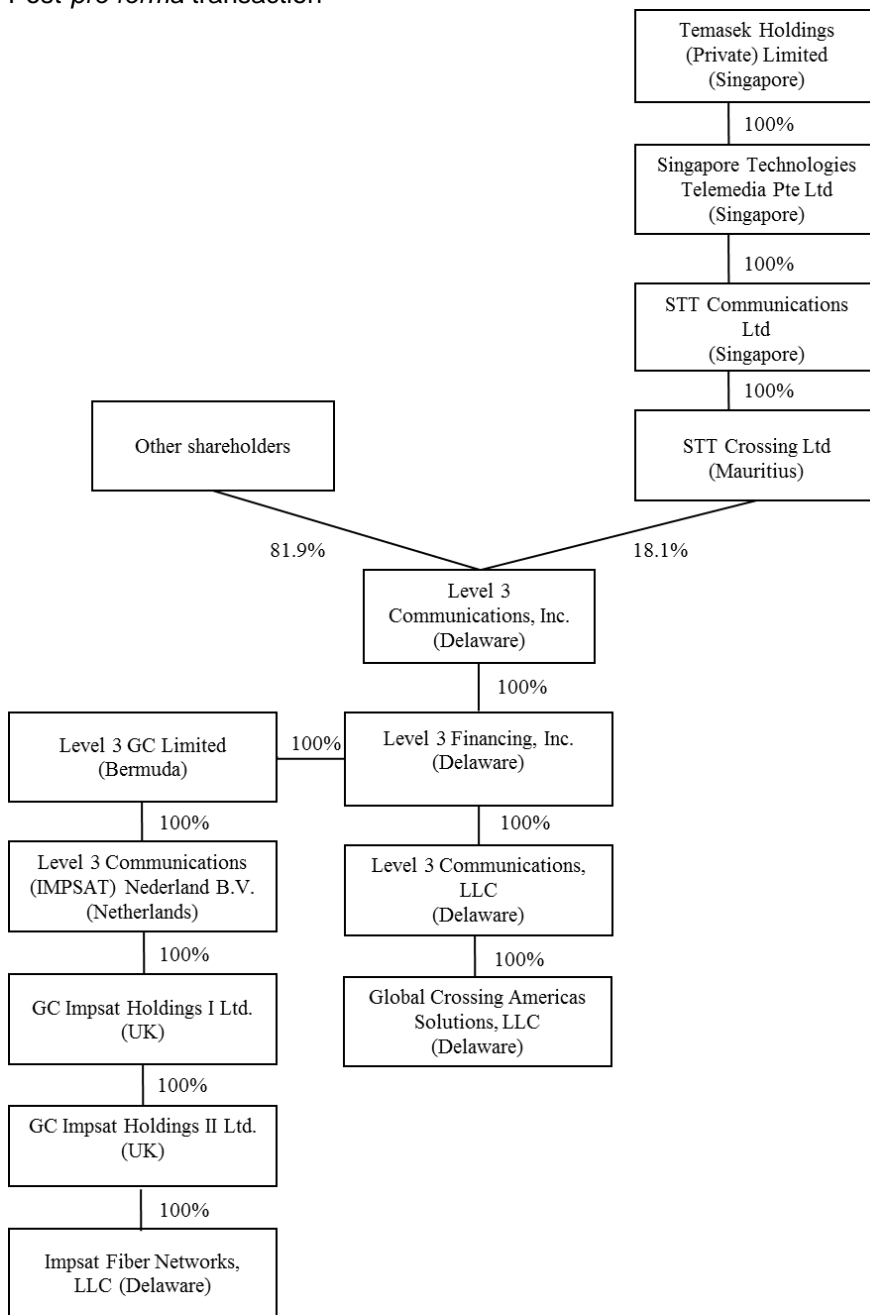
Exhibit 1

Please note that these charts identify changes to the organization of Level 3 Communications, Inc. that resulted from the *pro forma* transaction, and do not reflect the full corporate organization of Level 3 Communications, Inc.

I. Pre-*pro forma* transaction



II. Post-*pro forma* transaction

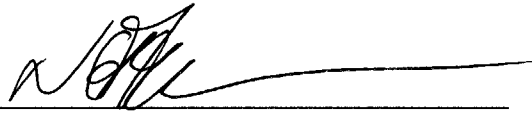


CERTIFICATION

I, Nicholas G. Alexander, hereby certify to the following:

- (1) All of the information contained in the attached notification letter is true and accurate to the best of my knowledge;
- (2) The assignment and transfer of control effected by the corporate reorganization described in the notification letter was *pro forma*, as defined in 47 C.F.R. § 63.24, and that taken together with all the previous *pro forma* transactions, did not result in a change in ultimate control of Global Crossing Americas Solutions, LLC; and
- (3) No party to this notification is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

January 13, 2017



Nicholas G. Alexander
Associate General Counsel
Level 3 Communications, LLC

CERTIFICATE OF SERVICE

I, Nicholas G. Alexander, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing notice of pro forma transfer of control of a cable landing license on this 13th day of January 2017, to the following:

Ambassador Daniel Sepulveda
U.S. Coordinator
Int'l Communications & Information Policy
Bureau of Economic and Business Affairs
U.S. DEPARTMENT OF STATE
EEB/CIP: Room 4826
2201 C Street, N.W.
Washington, D.C. 20520-5818

Kathy Smith
Chief Counsel
U.S. DEPARTMENT OF COMMERCE/NTIA
14th Street and Constitution Avenue, N.W.
Room 4713
Washington, D.C. 20230

William Brazis
General Counsel
DEFENSE INFORMATION SYSTEMS AGENCY
6910 Cooper Avenue
Fort Meade, Maryland 20755