

# LEBOEUF, LAMB, GREENE & MACRAE LLP

NEW YORK  
WASHINGTON, D.C.  
ALBANY  
BOSTON  
CHICAGO  
HARTFORD  
HOUSTON  
JACKSONVILLE  
LOS ANGELES  
PITTSBURGH  
SAN FRANCISCO

1875 CONNECTICUT AVE., N.W.  
SUITE 1200  
WASHINGTON, D.C. 20009-5728  
(202) 986-8000  
FACSIMILE: (202) 986-8102  
E-MAIL ADDRESS: BRETT.SNYDER@LLGM.COM  
WRITER'S DIRECT DIAL: (202) 986-8008

LONDON  
A MULTINATIONAL  
PARTNERSHIP  
PARIS  
BRUSSELS  
JOHANNESBURG  
(PTY) LTD.  
MOSCOW  
RIYADH  
AFFILIATED OFFICE  
BISHKEK  
ALMATY  
BEIJING

January 3, 2007

**BY HAND**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
c/o Natek, Inc., Inc.  
236 Massachusetts Avenue, N.E., Suite 110  
Washington, DC 20002

FILED/ACCEPTED

JAN - 3 2007

Federal Communications Commission  
Office of the Secretary

Re: *Telefonica International Wholesale Services USA, Inc., et al.*,  
File No. SCL-ASG-20061117-00014

Dear Ms. Dortch:

On November 17, 2006, Telefonica International Wholesale Services USA, Inc. ("TIUSA") and TI Wholesale Services Puerto Rico, Inc. ("TIPR"), joint licensees of a submarine cable landing license, filed in the referenced proceeding an application pursuant to section 1.767 of the Commission's rules, 47 C.F.R. § 1.767, seeking *ex post facto* Commission approval of a *pro forma* transfer of control.

Enclosed for filing in the referenced proceeding are an original and one copy of a certificate of service for the November 17, 2006 filing. Please date stamp and return to our messenger the additional copy enclosed for this purpose.

Respectfully submitted,



Brett A. Snyder  
Counsel to Telefonica International  
Wholesale Services USA, Inc. and  
TI Wholesale Services Puerto Rico, Inc.

Enclosure


CERTIFICATE OF SERVICE

I hereby certify that I have served this 3d day of January, 2007 a copy of the submission dated November 17, 2006 in File No. SCL-ASG-20061117-00014 by first-class mail, postage prepaid upon the persons below:

U.S. Coordinator, EB/CIP  
U.S. Department of State  
2201 C Street, NW  
Washington, DC 20520-5818

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

Defense Information Systems Agency  
Code RGC  
701 S. Courthouse Road  
Arlington, VA 22204



\_\_\_\_\_  
Brett A. Snyder