

**ATTACHMENT**

Global Crossing Americas Solutions, Inc. (“GCAS”) hereby seeks consent to the *pro forma* transfer of control of GCAS’s non-common carrier earth station authorizations from Impsat Fiber Networks, Inc. (“IFN”) to ALC Communications Corp. (“ALC”). This *pro forma* transfer of control is part of an internal corporate restructuring, by which ALC, through a series of steps, will acquire the stock of GCAS from IFN, such that GCAS will become a direct subsidiary of ALC. For important business reasons, it is critical that this *pro forma* transaction close by September 30, 2010. Accordingly, GCAS respectfully requests that the Commission process this application on an expedited basis.

GCAS, IFN, and ALC are all indirect, U.S. subsidiaries of Temasek Holdings (Private) Limited (“Temasek”). Because Temasek thus will continue to have ultimate control of GCAS’s licenses, the transfer of control to ALC is considered *pro forma* under the Commission’s rules. See 47 C.F.R. § 63.24(d) (“[A]ssignments that do not result in a change in the actual controlling party are considered non-substantial or *pro forma*.”); *id.*, Note 2 (stating that a “an assignment from a corporation to a corporation owned or controlled by the assignor stockholders without substantial change in their interests” is presumptively *pro forma*). In addition, no services will be discontinued as a result of this *pro forma* transfer of control. Accordingly, approval of this *pro forma* transfer of control would be in the public interest.

## Exhibit E

The following are the names, addresses, citizenship, and principal businesses of any person or entity that will directly or indirectly own at least ten percent of the equity of ALC, the transferee, after this *pro forma* transaction<sup>1</sup>:

**Global Crossing North America Inc. (“GCNA”)**

Address: 225 Kenneth Drive, Rochester, New York 14623-4277

Citizenship: New York

Principal Business: Holding company

Relationship: 100 percent owner of ALC

**Global Crossing North American Holdings, Inc. (“GCNAH”)**

Address: 225 Kenneth Drive, Rochester, New York 14623-4277

Citizenship: Delaware

Principal Business: Holding company

Relationship: 100 percent owner of GCNA

**Global Crossing Holdings Limited**

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: Holding company

Relationship: 100 percent owner of GCNAH

**Global Crossing Limited (“GCL”)**

Address: Wessex House, 45 Reid Street, Hamilton HM12, Bermuda

Citizenship: Bermuda

Principal Business: Telecommunications

Relationship: 100 percent owner of Global Crossing Holdings Limited

**STT Crossing Ltd. (“STT Crossing”)**

Address: 10 Frere Felix de Valois Street, Port Louis, Mauritius

Citizenship: Mauritius

Principal Business: Holding company

Relationship: 60.38 percent owner of GCL

**Fidelity Management & Research Co.**

Address: 82 Devonshire Street, Boston, Massachusetts 02109

Citizenship: United States

Principal Business: Investment firm

Relationship: 11.47 percent owner of GCL

---

<sup>1</sup> These ownership figures are accurate as of May 2010.

**STT Communications Ltd (“STT Communications”)**

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 100 percent owner of STT Crossing

**Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”)**

Address: 51 Cuppage Road #09-01, StarHub Centre, Singapore 229469

Citizenship: Singapore

Principal Business: Telecommunications and information technologies

Relationship: 100 percent owner of STT Communications<sup>2</sup>

**Temasek Holdings (Private) Limited**

Address: 60B Orchard Road #06-18, The Atrium@Orchard, Singapore 238891

Citizenship: Singapore

Principal Business: Investment holding company

Relationship: 100 percent owner of ST Telemedia

Because section 310(b)(4) of the Communications Act of 1934, as amended, does not apply to licenses issued on a non-common carrier basis, such as the non-common carrier earth station licenses held by GCAS, no foreign ownership showing is required in connection with this application. *See, e.g., Bell Atlantic New Zealand Holdings, Inc., Transferor, and Pacific Telecom Inc., Transferee, Applications for Consent to Transfer Control of a Submarine Cable Landing License, International and Domestic Section 214 Authorizations, a Cellular Radiotelephone License, Common Carrier and Non-Common Carrier Satellite Earth Station Licenses, and a Petition for Declaratory Ruling Pursuant to Section 310(b)(4) of the Communications Act, Order and Authorization, 18 FCC Rcd 23140 ¶ 24 n.79 (2003) (stating that, because “section 310(b)(4) governs only common carrier, broadcast, and aeronautical en route or fixed radio licenses,” the Commission would “not consider here the proposed foreign ownership as it relates to the non-common carrier earth station license”).*

---

<sup>2</sup> Of this amount, 0.01 percent of STT Communications’ shares are held by current members of ST Telemedia’s management, all of whom are citizens of Singapore, as nominees of and in trust for ST Telemedia.

## **Exhibit F**

As discussed above, this transaction involves the *pro forma* transfer of control of GCAS's non-common carrier earth station authorizations, which in turn is part of an internal corporate restructuring that must close by September 30, 2010. In addition, and as also noted above, no services will be discontinued as a result of this *pro forma* transfer of control. Accordingly, approval of this *pro forma* transfer of control would be in the public interest.