

FCC Form 312
Question 43
Attachment

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. holds the following satellite earth station authorizations:

E080113
E080114
E080121
E080122
E090214
E110153

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, a Delaware limited liability company; and
- (b) Impsat Fiber Networks, LLC transferred 100% of its interest in GCAS, LLC to Level 3 Communications, LLC. Impsat Fiber Networks, 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.

Level 3 Communications, Inc. undertook the internal reorganization resulting in the *pro forma* transfer of control described above to simplify the ownership structure of Level 3's holding and operating companies and for tax reasons. The *pro forma* transaction serves the public interest because Level 3's simplified organizational structure and improved tax status will allow it to be a more efficient and effective competitor.

Level 3 regrets that approval for this *pro forma* transaction was not obtained prior to its execution.