

**Global Crossing Americas Solutions, Inc.
Response to Form 312 Questions 29-34**

Attachment 3

Foreign Ownership Statement

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, including the non-common carrier earth station authorizations held by Global Crossing Americas Solutions, Inc. (“GCAS”), Level 3 Communications, Inc., and GCAS are not required to make a foreign ownership showing in 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”).*