

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matters of

GLOBAL CROSSING LIMITED,
Transferor,

and

LEVEL 3 COMMUNICATIONS, INC.,
Transferee,

Applications Filed for the Transfer of Control of
the Licensee Subsidiaries of Global Crossing
Limited to Level 3 Communications, Inc.

IB Docket No. 11-78

DECLARATION OF DAVID SIEGEL

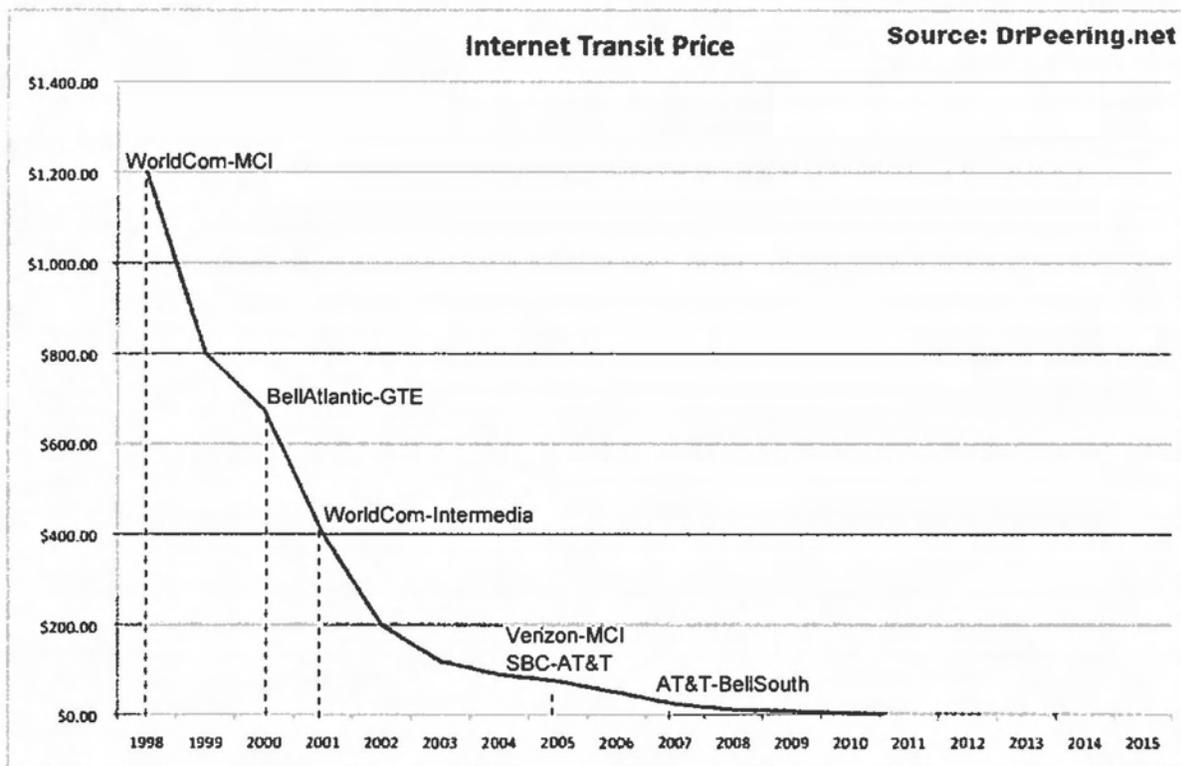
1. My name is David Siegel. I am Vice President of Data Services Product Management for Global Crossing Limited. ("GCL"). My business address is 14605 South 50th Street, Phoenix Arizona 85044.
2. As Vice President of Data Services, I am responsible for the switched data product line management, which includes products such as Internet Access, IP Transit, MPLS VPN, Managed Network Solutions and Managed Security Solutions.
3. GCL is a global telecommunications company. Through its subsidiaries, GCL owns and operates a global Internet Protocol ("IP")-based fiber optic network directly connecting more than 300 cities in 30 countries. GCL uses this network to provide telecommunications services and data and IP-based services to corporations, government agencies, and telecommunications carriers. GCL's U.S. operating subsidiaries hold numerous Commission authorizations for international telecommunications services, undersea cable facilities, and non-

common-carrier satellite earth stations, and some of them rely on blanket authority to provide domestic telecommunications services.

4. Most of GCL’s intercity and metropolitan network consists of dark fiber, circuits, and colocation space leased from many different network owners, including Qwest, Level 3, AboveNet, and regional operators.

5. In the last 13 years, GCL has seen its transit prices drop dramatically, with the drop in Level 3’s average transit prices roughly commensurate with the drop shown by Dr.Peering.net in Chart 1 below.

Chart 1: Internet Transit Price Change and Transactions, 1998-present



6. I have reviewed the paragraphs 23 to 29 of the Declaration of Nicolas Pujet. Under the methodology described therein, GCL estimates that it delivered approximately [REDACTED] of IP traffic to its

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North American customers (B). On this basis, GCL market share is [REDACTED]

[REDACTED]. Even including total traffic delivered from GCL's network (B+C or A), estimated to be [REDACTED]

[REDACTED], GCL's share still is only [REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed on 21 July, 2011


[name]

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