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BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Re: IB Docket No. 11-78; Request for Non-Dominant Treatment

Dear Ms. Dortch:

By this letter, Global Crossing Limited (“GCL”) responds to a request for clarification from Commission staff regarding the routes on which it requests non-dominant treatment following its acquisition by Level 3 Communications, Inc. (“Level 3”). GCL’s subsidiaries Global Crossing Americas Solutions, Inc. (“GCAS”) and Global Crossing North America, Inc. (“GCNA”) currently are regulated as dominant in the provision of international telecommunications services on the U.S.-Laos, U.S.-Singapore, and U.S.-Ireland routes, due to their affiliations with foreign carriers with market power in those markets.¹ Those affiliations arose through common ownership of GCL and certain foreign carriers by Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”).

¹ *Global Crossing Ltd. (Debtor in Possession), Transferor, and GC Acquisition Limited, Transferee, Applications for Consent to Transfer Control of Various FCC Licenses, Order and Authorization, 18 FCC Rcd 20,301 ¶ 62 (IB, WCB, and WTB 2003) (classifying International Optical Networks, L.L.C. as dominant on the U.S.-Singapore route); International Authorizations Granted, Public Notice, 25 FCC Rcd 3586, 3587 (2010) (accepting pro forma assignment of international Section 214 from International Optical Networks, L.L.C., to GCNA); Foreign Carrier Affiliation Notification, Public Notice, 25 FCC Rcd 7449, 7452 (2010) (accepting for filing GCAS’s and GCNA’s foreign carrier affiliation notifications with respect to Lao Telecommunications Company Limited and eircom Limited).*

However, as described in the parties' applications in this proceeding, those affiliations will cease as a result of the proposed transaction.² Consummation of the proposed transaction will reduce the indirect interest of STT Crossing Ltd (an indirect subsidiary of ST Telemedia) in GCAS and GCNA below 25 percent, meaning that GCAS and GCNA will no longer satisfy the definition of affiliation as set forth in 47 C.F.R. § 63.09(e).³ Accordingly, pursuant to 47 C.F.R. § 63.10(a)(1), GCL respectfully reiterates its request that following the consummation of the proposed transaction, GCAS and GCNA be regulated as non-dominant on the U.S.-Laos, U.S.-Singapore, and U.S.-Ireland routes.⁴

Please do not hesitate to contact me should you have any further questions. I can be reached at (202) 637-2194 or brian.murray@lw.com.

Sincerely,

/s/ *Brian W. Murray*

Brian W. Murray

Counsel to Global Crossing Limited

cc: Carrie-Lee Early
Kent Bressie (Wiltshire & Grannis LLP, on behalf of Level 3)

² See, e.g., Global Crossing Limited, Transferor, Level 3 Communications, Inc., Transferee, Application for Consent to Transfer Control of Authority to Provide Global Facilities-Based and Global Resale International Telecommunications Services and Domestic Common Carrier Transmission Lines Pursuant to Section 214 of the Communications Act of 1934, as Amended, IB Docket No. 11-78, at 12 (filed May 12, 2011) (stating that “as a consequence of the Proposed Transaction, however, GCAS and GCNA will no longer have foreign affiliations in Laos or Singapore. The Applicants therefore request, pursuant to 47 C.F.R. § 63.10(a)(1), that GCAS, GCNA, and Level 3 LLC be regulated as non-dominant on the U.S.-Laos and U.S.-Singapore routes.”).

³ See *id.* at 16-17.

⁴ Although the dominant treatment of GCAS and GCNA with respect to the U.S.-Singapore and U.S.-Laos routes was addressed in the parties' application, see *id.* at 15-16, the dominant treatment with respect to the U.S.-Ireland route was inadvertently omitted from that discussion.