

July 28, 2011

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

Re: IB Docket No. 11-78 – 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.

Dear Ms. Dortch:

IPC Network Services (IPC) files this letter in support of the above referenced transaction between Level 3 Communications, Inc. (Level 3) and Global Crossing Limited (Global Crossing). IPC is a long term customer of both Level 3 and Global Crossing, and believes there are multiple benefits arising from this transaction, including but not limited to the following points detailed below:

- The transaction will create a unique global services platform anchored by extensive facilities-based assets on three continents connected by undersea cables that IPC anticipates being able to leverage extensively.
- IPC believes that the combined entities will better serve IPC via wholly owned network in more than 50 countries, which will reach more than 70 countries.
- As an existing customer, IPC believes it will benefit from expanded geographic reach and a combination of intercity and metro networks throughout North America, Latin America and Europe, connected by ~40,000 miles of subsea cables.
- IPC believes it will be well placed to leverage the combined companies' extensive global portfolio of transport, IP and data solutions, content delivery, data center, colocation and voice services.
- IPC believes it will further benefit from Level 3's premier position with local and regional enterprises, wholesale and content customers; combined with Global Crossing's expertise serving national and multinational corporations, together providing enhanced growth opportunities.
- The combined service portfolio and distribution channels will allow the business to better address IPC's needs globally.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Brown', with a long horizontal flourish extending to the right.

David Brown  
SVP Global Network Operations  
IPC Network Services