

RECEIVED

JAN 21 2004

Federal Communications Commission
Office of the Secretary

HOGAN & HARTSON
L.L.P.

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

YARON DORI
PARTNER
(202) 637-5456
YDORI@HHLAW.COM

January 13, 2004

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

WC Docket No. 04-13

Attention: International Bureau, Policy Division

Re: Joint Application of Allegiance Telecom, Inc., and Qwest
Communications International Inc. for Consent to
Assignment of Assets Under Section 214

Dear Ms. Dortch:

This letter amends the above-referenced application, filed December 31, 2003, with respect to information required by Section 63.18 of the Commission's rules.

Qwest Communications Corporation ("QCC"), which holds international Section 214 authority, is a Delaware corporation and a wholly owned subsidiary of Qwest Services Corporation ("QSC"). QSC is a Delaware corporation and a wholly owned subsidiary of Qwest Communications International Inc. ("QCII"). The principal place of business of QCC, QSC, and QCII is 1801 California Street, Denver, Colorado 80202, and their principal business is telecommunications. The Anschutz Company, which is organized under the laws of Delaware, owns 17 percent of the shares of QCII and is wholly owned by Philip F. Anschutz, a U.S. citizen. Mr. Anschutz and the Anschutz Company are headquartered at 555 Seventeenth Street, Denver, Colorado 80202, and their principal businesses are transportation, natural resources, real estate, sports, entertainment, and telecommunications. There are no interlocking directorates with foreign carriers.

QCII and its subsidiaries hereby certify that they are affiliated, within the meaning of Section 63.09(e) of the Commission's rules, with the following

No. of Copies rec'd 2
List ABCDE

Marlene H. Dortch, Secretary
Federal Communications Commission
January 13, 2004
Page 2

foreign carriers, each of which is an indirect wholly owned subsidiary of QCII that lacks market power in any destination market:

- **Argentina:** Qwest Argentina S.R.L., which holds a reseller license.
- **Australia:** Qwest Australia Pty, Ltd., which operates as an unlicensed telecommunications reseller.
- **Canada:** Qwest Communications Corporation (QCC) itself is a foreign carrier in Canada, holding an International Reseller License Class B.
- **Hong Kong:** Qwest Hong Kong Telecommunications, Limited, which holds a PNETS (reseller) license.
- **Japan:** Qwest Communications Japan Corporation, which holds a Type 1 (facilities-based) license.
- **Korea:** Qwest Communications Korea, Ltd., which holds a reseller license.
- **Netherlands:** Qwest Netherlands B.V., a registered reseller of telecommunications services in the Netherlands.
- **Singapore:** Qwest Singapore Pte Ltd., which holds a SBO (reseller) license.
- **Switzerland:** Qwest Netherlands B.V., a registered reseller of telecommunications services in Switzerland.
- **Taiwan:** Qwest Taiwan Telecommunications, Ltd., which holds a Type 2 (reseller) license.
- **United Kingdom:** Qwest Communications International Ltd., which is licensed to provide International Simple Voice Resale service and facilities-based service.

QCC currently provides and intends to continue to provide international telecommunications services between the United States and each of the above-listed international points. Each of these destination markets is a member of the World Trade Organization. In addition, each listed affiliate is a new market entrant that lacks 50 percent share of the international transport and local access markets and does not control bottleneck services or other facilities in any destination market. Accordingly, no Qwest foreign affiliate has market power in any destination market.

This application qualifies for streamlined processing under Section 63.12 because, as demonstrated above, all affiliated foreign carriers operate in WTO

HOGAN & HARTSON LLP

Marlene H. Dortch, Secretary
Federal Communications Commission
January 13, 2004
Page 3

member countries and lack sufficient market power to affect competition adversely in the U.S. market.

Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Yaron Dori".

Yaron Dori
Counsel for Qwest Communications
International Inc.

cc: George Li, International Bureau
David Krech, International Bureau
Rebecca Halstead, International Bureau

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

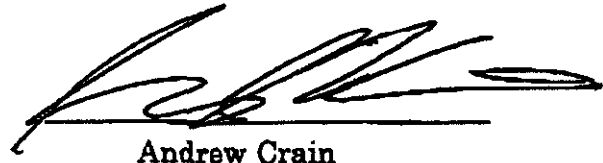
In the Matter of)
)
Allegiance Telecom, Inc.,)
Assignor,)
)
and)
)
Qwest Communications International Inc.,)
Assignee)
)
Application for Consent to Assignment)
of Assets under Section 214 of the)
Communications Act of 1984, as Amended)

VERIFICATION

1. I am Andrew Crain, Associate General Counsel of Qwest Services Corporation, a unit of Qwest Communications International Inc. I am authorized to make this Verification on behalf of Qwest Communications International Inc. and its subsidiaries (collectively, "Qwest") that are parties to the captioned Application.

2. I hereby certify under penalty of perjury that the information in the application filed December 31, 2003, with respect to Qwest, as amended by the foregoing amendment filed January 13, 2004, is true and correct.

Executed on January 13, 2004.


Andrew Crain