



Wiley Rein & Fielding LLP

1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

Virginia Office  
7925 JONES BRANCH DRIVE  
SUITE 6200  
McLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wrf.com

October 11, 2006

Scott D. Delacourt  
202.719.7459  
sdelacourt@wrf.com

**VIA ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

Re: Application for Consent to the Transfer of Control of Cable Landing  
Licenses from BellSouth Corporation to AT&T Inc., WC Docket No. 06-  
74, File No. SCL-T/C-20060331-00003

Dear Ms. Dortch:

BellSouth Corporation (“BellSouth”), by counsel, hereby withdraws the amendment to IBFS File No. SCL-T/C-20060331-00003, which was filed on April 19, 2006 (“Amendment”). As noted in the Amendment (attached as Exhibit A), BellSouth initially filed the application to transfer control of certain submarine cable landing licenses (“Licenses”) to AT&T Inc. indicating that BellSouth Long Distance, Inc. was the licensee of the Licenses. Subsequently, however, BellSouth discovered that the Commission’s records did not reflect a prior *pro forma* assignment of the Licenses from BellSouth International, Inc. to BellSouth Long Distance, Inc., both wholly-owned subsidiaries of BellSouth. Thus, BellSouth International, Inc. was still listed in the Commission’s records as the licensee for the Licenses.

At the International Bureau’s request, BellSouth filed the Amendment so that the licensee listed on the application corresponded to the Commission’s records. Concurrently with the Amendment, BellSouth filed an application for approval of the *pro forma* assignment of the Licenses from BellSouth International, Inc. to BellSouth Long Distance, Inc. under File No. SCL-ASG-2006-0419-00006. That application was granted on June 7, 2006. The grant of that application obviates the need for the Amendment, since the original transfer of control application reflects the appropriate licensee, BellSouth Long Distance, Inc. Thus, BellSouth withdraws the Amendment.

Please contact the undersigned counsel with any questions.

**Wiley Rein & Fielding LLP**

Marlene Dortch  
October 11, 2006  
Page 2

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Scott D. Delacourt  
*Counsel for BellSouth Corporation*

cc (via email): David Krech  
Nicholas Alexander

cc (via U.S. mail): U.S. Coordinator, EB/CIP  
U.S. Department of State  
2201 C Street, NW  
Washington, DC 20520-5818

Office of the Chief Counsel/NTIA  
U.S. Department of Commerce  
14<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20230

Defense Information Systems Agency  
Code RGC  
701 S. Courthouse Road  
Arlington, VA 22204

Attachment

# Exhibit A

Amendment Filed April 19, 2006



Wiley Rein & Fielding LLP

1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

Virginia Office  
7925 JONES BRANCH DRIVE  
SUITE 6200  
McLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

[www.wrf.com](http://www.wrf.com)

April 19, 2006

Chin Kyung Yoo  
202.719.3581  
[cyoo@wrf.com](mailto:cyoo@wrf.com)

**VIA ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Application for Consent to the Transfer of Control of Cable  
Landing Licenses from BellSouth Corporation to AT&T Inc., WC  
Docket No. 06-74, File No. SCL-T/C-20060331-00003

Dear Ms. Dortch:

BellSouth Corporation (“BellSouth”), by counsel, hereby submits additional information to amend the above-referenced applications (“Applications”). Specifically, in conducting its due diligence in connection with the AT&T/BellSouth merger, BellSouth discovered that the Commission's records do not reflect the pro forma assignment of BellSouth's interests in the MAYA-1 and TAT-14 submarine cable landing licenses, (File Nos. SCL-LIC-19990325-00006 and SCL-LIC-19990303-00004, respectively) from BellSouth International, Inc. to BellSouth Long Distance, Inc. This pro forma assignment is reflected in an application being filed today with the Secretary's office. At the staff's request, we are hereby amending the application to transfer control of the BellSouth interests in those submarine cable landing licenses from BellSouth to AT&T (File No. SCL-T/C-20060331-00003) so that the licensee listed in the application corresponds to the licensee of record pending the processing of the pro forma assignment, *i.e.*, BellSouth International, Inc. instead of BellSouth Long Distance, Inc.

**Wiley Rein & Fielding LLP**

Marlene Dortch

April 19, 2006

Page 2

Please contact the undersigned counsel with any questions.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_

Peter D. Shields

Chin Kyung Yoo

*Counsel for BellSouth Corporation*

cc (via email):       David Krech  
                              Nicholas Alexander

cc (via U.S. mail):   U.S. Coordinator, EB/CIP  
                              U.S. Department of State  
                              2201 C Street, NW  
                              Washington, DC 20520-5818

Office of the Chief Counsel/NTIA  
U.S. Department of Commerce  
14<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20230

Defense Information Systems Agency  
Code RGC  
701 S. Courthouse Road  
Arlington, VA 22204