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January 15, 2010

BY ELECTRONIC FILING

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

**Re: North American Communications Limited; Transfer of Control
File No. ITC-T/C-20091009-00441**

Dear Ms. Dortch:

North American Communications Limited (“North American”), eircom Holdings Limited (“ERC”) and Singapore Technologies Telemedia Pte Ltd (“ST Telemedia,” and together with North American and ERC, the “Applicants”) hereby notify the Commission that the transfer of control of North American was completed on January 4, 2010. North American holds two international section 214 authorizations: ITC-214-19981001-00682 and ITC-214-19981015-00711.

The Commission conditioned its approval of this transfer of control on the Applicants notifying it of the final equity and voting interests in North American’s indirect parent corporation, Emerald Communications (Cayman) SPC (“ECC”), within 30 days of the consummation of this transaction.¹ In accordance with that condition, the Applicants state that ST Telemedia’s subsidiary STT Communications Ltd (“STT Communications”), through its wholly owned subsidiary Emerald Communications (Singapore) Pte Ltd (“ECS”), and eircom ESOP Trustee Limited (“ESOT,” the trustee of an employee share ownership trust) each own 50 percent of the equity and voting interest in ECC.

This outcome is consistent with the Applicants’ representations in their application (*see* Attachment 1 at pages 4-5), in which they stated that STT Communications (through ECS) and ESOT would each hold up to 50 percent of the equity and voting interests in ECC. Although ESOT and ECS each hold 50 percent of the equity and voting interests in ECC, ESOT has fewer rights with respect to the governance and operations of ECC and its subsidiaries than ECS, as the

¹ *See International Authorizations Granted*, Public Notice, Report No. TEL-01396, DA No. 09-2406, at 3 (rel. Nov. 12, 2009).

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Applicants explained at length in their application (*see* Attachment 1 at pages 4-6). Thus, as the Commission found in approving this transfer of control, STT Communications (through ECS) now controls North American.²

Please contact the undersigned should you have any questions.

Sincerely,



Brian Murray

cc (via electronic mail):

David Krech

² *See id.* As the Applicants stated in their application (Attachment 1 at page 1, note 1), STT Communications has acquired “control” of North American and its international section 214 authorizations solely as that term is understood for purposes of the applicable rules and practices of the U.S. Federal Communications Commission. As in their application, the Applicants make no representations as to whether STT Communications possesses control of North American for any other purpose or under any other U.S. or foreign laws (including but not limited to the applicable tax regulations and accounting standards).