

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
REACH GLOBAL NETWORKS LTD.) **File No.** _____)
)
Notification of Foreign Affiliation)
Under Section 1.768 of the Commission's)
Rules)

NOTIFICATION

Reach Global Networks Ltd. ("RGNL"), a licensee of the Japan-U.S. cable system, hereby notifies the Commission of the following affiliations with foreign carriers in the cable system's destination market (*i.e.*, Japan) pursuant to Section 1.768 of the Commission's Rules, 47 C.F.R. § 1.768. As required by Section 1.768(e) of the Commission's Rules, RGNL provides and hereby certifies the following information:

(1) In Japan, RGNL has become affiliated with:

- PCCW Global (Japan) K.K.; and
- PCCW Global Pte. Ltd. (Japan Branch).

These affiliations arise from the fact that PCCW Limited ("PCCW"), being a 50 percent-owned shareholder of REACH Ltd. ("REACH"), RGNL's parent company, holds a 25 percent or greater interest indirectly in PCCW Global (Japan) K.K. and PCCW Global Pte. Ltd. (Japan Branch).

(2) Japan is a Member of the World Trade Organization.

(3) RGNL holds a license for the Japan-U.S. cable system as granted in IB File No. SCL-T/C-20061204-00013.

(4) RGNL is a wholly-owned subsidiary of REACH, a Bermuda company and a

provider of international telecommunications services in Asia, the U.S., and other jurisdictions. REACH's address is as follows:

REACH Ltd.
20th Floor, Telecom House
3 Gloucester Road
Wan Chai, Hong Kong

PCCW Limited ("PCCW") and Telstra Corporation Limited (ABN 33 051 775 556) ("Telstra") each holds a 50 percent indirect ownership interest in REACH, as follows.

PCCW. REACH is 50 percent owned by Pacific Century Cable Holdings Limited ("PCCH", a Bermuda company and a wholly-owned subsidiary of PCCW) that is a holding company. PCCH's address is:

Pacific Century Cable Holdings Limited
Clarendon House
2 Church Street
Hamilton HM11
Bermuda

The following entities hold directly or indirectly a 10 percent or greater ownership interest in PCCH:

| | |
|---------------------|--|
| Name: | PCCW Limited |
| Address: | 39th Floor, PCCW Tower TaiKoo Place 979 King's Road Quarry Bay, Hong Kong |
| Citizenship: | Hong Kong |
| Principal Business: | Telecommunications |
| Percentage Held: | PCCW Limited holds directly 100 percent of the ownership interests of PCCH. |

| | |
|---------------------|--|
| Name: | Pacific Century Regional Developments Limited |
| Address: | 6 Battery Road #38-02 Singapore 049909 |
| Citizenship: | Singapore |
| Principal Business: | Investment holding company |
| Percentage Held: | Pacific Century Regional Developments Limited holds directly approximately 21.29 percent of the ownership interests of PCCW Limited. |

| | |
|-------|--|
| Name: | Pacific Century Group (Cayman Islands) Limited |
|-------|--|

Address: Scotia Centre, 4th Floor
P.O. Box 2804, George Town
Grand Cayman
KY1-1112, Cayman Islands
Citizenship: Cayman Islands
Principal Business: Investment holding company
Percentage Held: Pacific Century Group (Cayman Islands) Limited holds directly approximately 37.50 percent and indirectly approximately 37.76 percent (via Anglang Investments Limited) of the ownership interests of Pacific Century Regional Developments Limited.

Name: Pacific Century International Limited
Address: BCI House, Avarua
Rarotonga, Cook Islands
Citizenship: Cook Islands
Principal Business: Investment holding company
Percentage Held: Pacific Century International Limited holds directly 100 percent of the ownership interests of Pacific Century Group (Cayman Islands) Limited.

Name: Pacific Century Group Holdings Limited
Address: Romasco Place, Wickhams Cay 1
P.O. Box 3140, Road Town
Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company
Percentage Held: Pacific Century Group Holdings Limited holds directly 100 percent of the ownership interests of Pacific Century International Limited, and directly approximately 1.55 percent of the ownership interest of PCCW Limited.

Name: Ocean Star Management Limited
Address: Richmond House, 12 Par-la-Ville Road
Hamilton, HM08, Bermuda
Citizenship: Bermuda
Principal Business: Investment holding company
Percentage Held: Ocean Star Management Limited holds directly 100 percent of the ownership interests of Pacific Century Group Holdings Limited as trustee of The Ocean Unit Trust and The Starlite Unit Trust.

Name: OS Holdings Limited
Address: Clarendon House, 2 Church Street
Hamilton, HM11, Bermuda

Citizenship: Bermuda
Principal Business: Investment holding company
Percentage Held: OS Holdings Limited holds directly 100 percent of the ownership interests of Ocean Star Management Limited.

Name: China Netcom Corporation (BVI) Limited
Address: Wickhams Cay 1, P.O. Box 3140, Road Town
Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company
Percentage Held: China Netcom Corporation (BVI) Limited holds directly approximately 18.48 percent of the ownership interests of PCCW Limited.

Name: China Netcom Group Corporation (BVI) Limited
Address: Wickhams Cay 1, P.O. Box 3140, Road Town
Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company
Percentage Held: China Netcom Group Corporation (BVI) Limited holds directly 100 percent of the ownership interests of China Netcom Corporation (BVI) Limited.

Name: China United Network Communications Group Company Limited
Address: No.21 Financial Street, Xicheng District
Beijing, 100033, The People's Republic of China
Citizenship: The People's Republic of China
Principal Business: Telecommunications
Percentage Held: China United Network Communications Group Company Limited directly holds 100 percent of the ownership interests of China Netcom Group Corporation (BVI) Limited.

Name: The People's Republic of China
Citizenship: The People's Republic of China
Principal Business: Government
Percentage Held: The People's Republic of China holds directly 100 percent of the ownership interests of China United Network Communications Group Company Limited.

Telstra. Telstra Holdings (Bermuda) No. 1 Limited ("Telstra Bermuda") holds 50 percent of the ownership interest in REACH. Telstra Bermuda is a Bermuda corporation and a holding company. The address of Telstra Bermuda is as follows:

Telstra Holdings (Bermuda) No. 1 Limited
Clarendon House
2 Church Street
Hamilton MH11
Bermuda

Telstra Bermuda is a wholly-owned subsidiary of Telstra Holdings Pty Limited (ABN 33 057 808 938), an Australian company and a holding company. Telstra Holdings Pty Limited's address is as follows:

Telstra Holdings Pty Limited (ABN 33 057 808 938)
Level 13, 231 Elizabeth Street
Sydney, NSW 2000
Australia

Telstra Holdings Pty Limited is wholly owned by an Australian telecommunications company, Telstra Corporation Limited. The address of Telstra Corporation Limited is as follows:

Telstra Corporation Limited (ABN 33 051 775 556)
242 Exhibition Street
Melbourne, VIC 3000
Australia.

The Future Fund Board of Guardians ("Future Fund Board") holds 8.81 percent of the ownership interest in Telstra. The Future Fund Board is a Commonwealth investment fund organized under the laws of the Commonwealth of Australia as a Commonwealth Government Entity. The Future Fund was set up to strengthen the Commonwealth's long-term finances by providing for its unfunded employees retirement plan liabilities. The Future Fund Board is a separate legal entity from the Commonwealth, is responsible for investment decisions of the Future Fund, and holds the Future Fund's assets for and on behalf of the Commonwealth. The Future Fund Board has rights and obligations like any other Telstra shareholder and thus does not have *de facto* control of Telstra. The address of the Future Fund Board is as follows:

Future Fund Board of Guardians
Locked Bag 22010
Melbourne, VIC 3001
Australia

- (5) No individuals are officers or directors of RGNL as well as the foreign carrier affiliates listed in (1).

- (6) This notification is subject to paragraph (c) of Section 1.768. RGNL became affiliated with the foreign carrier affiliates listed in (1) as of the following dates:¹
- PCCW Global (Japan) K.K.: July 14, 2006.
 - PCCW Global Pte. Ltd. (Japan Branch): July 26, 2006.
- (7) RGNL hereby certifies that it relies on the exception in paragraph (b)(2)(i). RGNL's foreign carrier affiliates listed in (1) each lack 50 percent market share in the international transport and local access markets in Japan. Currently, each of these carriers either has not yet begun operation or, if providing service: (1) controls less than 25 percent of the market; (2) competes against at least one other carrier that controls a majority of the international telecommunications market; and (3) lacks market power or facilities that would permit it to set market prices, control services or facilities, control market entry, or discriminate against unaffiliated U.S. carriers. Thus, RGNL is entitled to continued non-dominant treatment on the U.S. - Japan route.

¹ As appropriate, RGNL requests a waiver of the requirement that carriers notify the FCC of foreign affiliations within 30 days after closing. RGNL's failure to file within the specified timeframe was inadvertent in each instance. RGNL notes that it clearly qualifies for continued nondominant treatment on the U.S.- Japan route. RGNL apologizes for any inconvenience resulting from its failure to file this notification in a timely manner.

Finally, RGNL advises the Commission that it is no longer affiliated, as that term is defined in the FCC's Rules, with Reach Services K.K. in Japan. For the convenience of the Commission, a revised list of all RGNL affiliations on the U.S. – Japan route is provided in Attachment 1. This list includes all of the foreign carrier affiliates on the U.S. – Japan route for which RGNL has previously provided notice to the Commission (in applications or notifications) except those affiliates that are no longer in service.

Respectfully submitted,

REACH GLOBAL NETWORKS LTD.

By: _____


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Its Attorney

Date: December 9, 2010

RGNL Foreign Carrier Affiliates in Japan

PCCW Global (Japan) K.K.
PCCW Global Pte. Ltd. (Japan Branch)
REACH Networks K.K.
Telstra Japan (Retail) K.K.