

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

**In the Matter of** )  
 )  
**TELSTRA INCORPORATED** ) **File No.** \_\_\_\_\_ )  
 )  
**Notification of Foreign Affiliation** )  
**Under Section 1.768 of the Commission's** )  
**Rules** )

**NOTIFICATION**

Telstra Incorporated ("Telstra USA"), a licensee of the Asia American Gateway cable system ("AAG"), hereby notifies the Commission of the following affiliation with a foreign carrier in one of the cable system's destination markets 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, Telstra USA provides and hereby certifies to the following information:

- (1) In Thailand, a destination market for the AAG, Telstra USA has become affiliated with Reach Communications Services (Thailand) Ltd.
- (2) Thailand is a Member of the World Trade Organization.
- (3) Telstra USA holds a license for AAG as granted in IB File No. SCL-LIC-20070824-00015.
- (4) Telstra USA 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 directors of Telstra USA as well as the carrier listed in (1).
- (6) This notification is subject to paragraph (c) of Section 1.768. Telstra USA became affiliated with Reach Communications Services (Thailand) Ltd. on August 18, 2010.<sup>1</sup>
- (7) Telstra USA hereby certifies that it relies on the exception in paragraph (b)(2)(i) for the Thailand route. Reach Communications Services (Thailand) Ltd lacks 50 percent market share in the international transport and local access markets in Thailand. This carrier: (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

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

that would permit it to set market prices, control services or facilities, control market entry, or discriminate against unaffiliated U.S. carriers. Thus, Telstra USA is entitled to continued non-dominant treatment on the U.S. - Thailand route.

Finally, Telstra USA advises the Commission that it is no longer affiliated, as that term is defined in the FCC's Rules, with Reach Services Hong Kong Ltd. in Hong Kong. For the convenience of the Commission, a revised list of all Telstra USA affiliations with foreign carriers in the destination markets for AAG is provided in Attachment 1. This list includes all of the cable-related foreign carrier affiliates for which Telstra USA has previously provided notice to the Commission (in applications or notifications) except those affiliates that are no longer in service.

Respectfully submitted,

**TELSTRA INCORPORATED.**

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Its Attorney

Date: 12/28/2010

**Telstra USA Affiliations with Foreign Carriers**  
**in AAG Destination Markets**

<b>Name of the Affiliated Carrier:</b>	<b>Country:</b>	<b>Cable System:</b>
CSL Limited*	Hong Kong	AAG
REACH Cable Networks Limited	Hong Kong	AAG
REACH Global Services Limited	Hong Kong	AAG
REACH Networks Hong Kong Limited	Hong Kong	AAG
Telstra International HK Limited (HK)	Hong Kong	AAG
REACH Bandwidth Services Malaysia Sdn. Bhd.	Malaysia	AAG
REACH Networks Philippines Inc.	Philippines	AAG
REACH International Telecom (Singapore) Pte. Limited	Singapore	AAG
Telstra Singapore Pte Ltd	Singapore	AAG
REACH Communications Services (Thailand) Ltd.	Thailand	AAG

\*CSL Limited obtained a Unified Carrier Licence in Hong Kong in June 2009, thus replacing the licenses previously held by Hong Kong CSL Limited and New World PCS Limited.