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Federal Communications Commission  
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## BY HAND DELIVERY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

Re: *Global Crossing Limited, Petition for Declaratory Ruling*  
*File No. ISP-PDR-20070605-00008*

Dear Ms. Dortch:

At the request of Commission staff, Global Crossing Limited (“GCL”) hereby provides additional information regarding its above-captioned petition for a declaratory ruling. In that petition, GCL seeks a ruling allowing an increase in the indirect foreign ownership of GCL—and thus of GCL’s Title III-licensed subsidiaries—by Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”), Temasek Holdings (Private) Limited (“Temasek”), and the Government of Singapore from the currently approved level of 61.5 percent to 66.25 percent.<sup>1</sup>

First, GCL has two common carrier subsidiaries with point-to-point microwave licenses subject to the foreign ownership restrictions of 47 U.S.C. § 310(b)(4). These are the same subsidiaries and licenses addressed by the Commission in its October 2003 decision approving GCL’s current level of foreign ownership.<sup>2</sup> These licensees and licenses are:

- Global Crossing North American Networks, Inc.: WHO323, WHO324, WHO325, WHO326, WHO327, WHO328, WHO329, WHO330, WHO331, WHO332, WHO333, WHO334, WHO335, WHO336, WHO337, WHO338, WHO339,

<sup>1</sup> Global Crossing Limited; Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act of 1934, as Amended, File No. ISP-PDR-20070605-00008 (filed June 5, 2007) (“GCL Petition”).

<sup>2</sup> *Global Crossing Ltd. (Debtor-in-Possession), Transferor, and GC Acquisition Limited, Transferee, Applications for Consent to Transfer Control of Submarine Cable Landing Licenses, International and Domestic Section 214 Authorizations, and Common Carrier and Non-Common Carrier Radio Licenses, and Petition for Declaratory Ruling Pursuant to Section 310(b)(4) of the Communications Act*, Order and Authorization, 18 FCC Rcd 20301, App. B (2003) (“GCL Transfer Order”).

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WHO340, WHO341, WHO342, WHO343, WHO344, WHO345, WHO346,  
WHO347, WHQ999, WKL999, WLA738, WPMP453, WPRT617

- Equal Access Networks, Inc.: WPQT835, WPQT846, WPQT847, WPQT858,  
WPQT878, WPQW538, WPQW551, WPQY984, WPQW986, WPRU925,  
WPRU931, WPRU932, WPRV200, WPRV201, WPTN207, WPTN208, WPTN209,  
WPTN211, WPTN775, WPXB290

Second, the home market of Fullerton (Private) Limited (“Fullerton”), through which Temasek will hold an approximate 0.02 percent equity and voting interest in GCL,<sup>3</sup> is Singapore. Fullerton is a private limited company incorporated and headquartered in Singapore. Its investment principal (Temasek) has its principal place of business in Singapore, and the majority of its officers and directors are Singapore nationals. Its principal business is that of an investment holding company. The majority of its tangible property is held, and the majority of its sales and revenues is generated, by its investee companies, which are located in various World Trade Organization (“WTO”) Member countries. As GCL noted in its petition, Fullerton is not in the same ownership chain as ST Telemedia, through which Temasek will indirectly hold the balance of its equity and voting interest in GCL.<sup>4</sup>

Please contact me should you have any questions.

Truly yours,



Brian Murray  
Counsel to Global Crossing Limited

cc (via electronic mail):

Susan O’Connell

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<sup>3</sup> See GCL Petition at 4 n.8.

<sup>4</sup> See *id.*