

GLENN B. MANISHIN  
DIRECT DIAL: 202.776.7813  
PERSONAL FAX: 202.478.2875  
E-MAIL: gbmanishin@duanemorris.com

www.duanemorris.com

NEW YORK  
LONDON  
SINGAPORE  
LOS ANGELES  
CHICAGO  
HOUSTON  
HANOI  
PHILADELPHIA  
SAN DIEGO  
SAN FRANCISCO  
BALTIMORE  
BOSTON  
WASHINGTON, DC  
LAS VEGAS  
ATLANTA  
MIAMI  
PITTSBURGH  
NEWARK  
BOCA RATON  
WILMINGTON  
CHERRY HILL  
PRINCETON  
LAKE TAHOE  
HO CHI MINH CITY

March 15, 2010

**VIA IBFS AND EMAIL**

Sumita Mukhoty, Esq.  
Senior Attorney, Policy Division  
International Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re:** *Surfcreek Communications, Inc. Application for 214 Transfer  
(FRN # 0017118399)*

Dear Ms. Mukhoty:

This law firm represents applicant Surfcreek Communications, Inc. (“Surfcreek”) and indirect foreign purchaser Wavecrest Netherlands, BV (“Wavecrest”) in connection with the captioned application for transfer of Surfcreek’s Section 214 international telecommunications certificate (ITC-214-20071113-004565), filed January 4, 2010. I am writing at the request of the International Bureau to supplement the record as to the citizenship information for 10% or greater shareholders of Wavecrest and its parent entity(ies) for purposes of the Commission’s national security review of the application.

We have been informed by our clients, as set forth in the application (at page 3 & note 4), that Wavecrest is owned by Siponomic BV (“Siponomic”), a Netherlands corporation with offices at Van Vollenhovenstraat 3, 3016 BE Rotterdam, Zuid-Holland, The Netherlands. Siponomic’s stock is as of today 88% controlled by Ramphastos Investments NV (“Ramphastos”), a Curacao, Netherlands Antilles corporation with offices at Groningensingel 1, 10th Floor, 6835 EA Arnhem, The Netherlands. The owner of Ramphastos is Marcel Boekhoorn, a Netherlands national.

Voting interests in Siponomic track equity shareholding percentages. Among the shareholders of Siponomic, other than Ramphastos there is presently no individual or entity directly or indirectly holding more than 10% of that company’s outstanding equity. Hans van Helden, an officer of Wavecrest and a United States citizen, currently holds only 5% of

Sumita Mukhoty, Esq.  
FCC International Bureau  
March 15, 2010  
Page 2

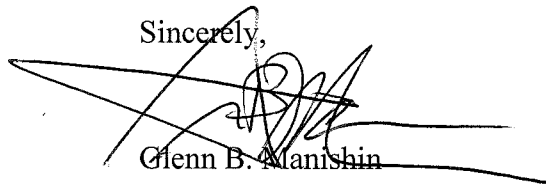
Siponomic's outstanding common stock. Please note that certain employees own stock options which may, but cannot until exercised, result in changes in the relative allocation of Siponomic shares. On a "fully diluted" basis — that is, assuming conversion of all such stock options and warrants — Rhamphastos would hold 80% and Mr. van Helden would hold 10% of Siponomic's stock. These fully diluted percentages are *not* equivalent, however, to voting interests because unexercised stock options are not entitled to vote on corporate governance matters.

No other individual or entity, on either a current or fully diluted basis, holds a 10% or greater equity or voting interest, direct or indirect, in Siponomic or Surfcreak Acquisitions, Inc. The latter, as explained in the application (at page 2), is a wholly owned subsidiary of Wavecrest and thus an indirect subsidiary of Siponomic and Ramphastos.

Having clarified that no Section 310(b)(4) finding is necessary in this matter because Surfcreak does not hold any common carrier *radio* licenses, this letter will also serve to formally withdraw Surfcreak's pending Petition for Declaratory Ruling As to Indirect Foreign Ownership.

Please do not hesitate to contact me if you have any questions or if additional information relevant to the Commission's national security review process is required.

Sincerely,



Glenn B. Manishin

cc: Thierry Mbandi, Surfcreak  
Hans van Helden, Wavecrest