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August 30, 2010

VIA IBFS

James Ball
Chief, Policy Division
International Bureau
Federal Communications Commission
Washington, DC 20554

Re: *Pacific Telecom Inc.*
ISP-PDR-20100720-00015

Dear Mr. Ball:

Attached please find responses to the information requests in the above-referenced proceeding regarding the ownership and principal places of business of Sumitomo Corporation of America and its parent Sumitomo Corporation.

We note that the comment period in this proceeding expired August 26, 2010, with no comments being filed. We would appreciate being notified promptly if any additional information is required.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/
Kenneth D. Patrich
Timothy J. Cooney

cc: David Krech
Susan O'Connell
Carrie-Lee Early
Neil Dellar
David Strickland

**RESPONSES OF SUMITOMO CORPORATION TO INFORMATION
REQUESTS FROM FCC INTERNATIONAL BUREAU**

**I. PRINCIPAL PLACE OF BUSINESS SHOWINGS FOR SUMITOMO
CORPORATION (JAPAN) AND SUMITOMO CORPORATION OF
AMERICA**

Sumitomo Corporation

(a) the country of incorporation;

Sumitomo Corporation was incorporated on December 24, 1919 in Japan.

(b) the citizenship of Sumitomo's executive-level corporate officers

All 33 executive officers and 12 directors are Japanese citizens

(c) the country where the world headquarters is located;

Tokyo, Japan

(d) the country in which the majority of tangible property is located;

Japan

(e) the country from which Sumitomo Corporation derives the greatest sales and revenues from its operations.

Japan

Sumitomo Corporation of America ("SCOA")

(a) the country of incorporation;

Sumitomo Corporation of America is incorporated in New York

(b) the citizenship of Sumitomo Corporation of America's corporate executive officers and directors

Out of the 10 executive officers of SCOA 9 are Japanese citizens, 1 is American, and all three directors are Japanese citizens.

(c) the country where the world headquarters of Sumitomo Corporation of America is located;

New York, New York, United States

(d) the country in which the majority of tangible property of Sumitomo Corporation of America is located;

United States

(e) the country from which Sumitomo Corporation of America derives the greatest sales and revenues from its operations.

United States

II. NARRATIVE DESCRIPTION OF OWNERSHIP INFORMATION

Sumitomo Corporation of America is an indirect wholly-owned subsidiary of Sumitomo Corporation.

The following information about Sumitomo Corporation is current as of March 31, 2010:

Sumitomo Corporation is a publicly-traded Japanese corporation whose shares are widely-held and traded on the Tokyo, Osaka, Nagoya, and Fukuoka stock exchanges in Japan. No single shareholder holds ten percent or more of the shares of Sumitomo Corporation. The largest non-Japanese shareholder with 3.65 % of the shares is Liberty Programming Japan Inc., an affiliate of U.S. media company Liberty Media Corporation.

Sumitomo Corporation records indicate that it has a total of 130,113 shareholders.

According to Sumitomo's web site

(http://www.sumitomocorp.co.jp/english/ir/stock/stock_data.html):

35.99% of the shares are held by overseas (non-Japanese) entities,
39.59% by Japanese financial institutions,
1.62% by Japanese securities firms,
9.61% by other Japanese corporations, and
13.15% by individuals and others.

Sumitomo does not have detailed information about all 130,113 shareholders, but it does have data about the top 100 shareholders, which collectively hold 66.71% of the shares (the 100th largest shareholder holds 0.17% of the shares).

The countries represented by the Top 100 shareholders all are WTO members; and the 66.71% of shares held by them are broken out as follows: Japan 43.20% and overseas 23.51% (US 15.82%; UK 4.02%; Kingdom of Saudi Arabia 1.46%; Australia 1.09%; Belgium 0.58%; Singapore 0.32%; and Switzerland 0.22%). Using these data as a proxy, the total overseas ownership of Sumitomo can be approximated as follows:

Approximated Breakdown of Total Overseas (non-Japanese) Shareholdings

US 24.22%	((15.82%/23.51%) x 35.99% overseas);	WTO
UK 6.15%	((4.02%/23.51%) x 35.99% overseas);	WTO
Saudi Arabia 2.23%	((1.46%/23.51%) x 35.99% overseas);	WTO
Australia 1.67%	((1.09%/23.51%) x 35.99% overseas);	WTO
Belgium 0.89%	((0.58%/23.51%) x 35.99% overseas);	WTO
Singapore 0.49%	((0.32%/23.51%) x 35.99% overseas);	WTO
Switzerland 0.34%	((0.22%/23.51%) x 35.99% overseas).	WTO
Total Overseas (non-Japanese) 35.99% (US 24.22%; other 11.77%)		

III. RESPONSES TO SPECIFIC INFORMATION REQUESTS

Full detail is not available about each of Sumitomo Corporations' 130,113 shareholders, but the responses provided below are approximations that are considered generally accurate:

a)

- (i) *The aggregate percentage of total equity and voting stock held by or on behalf of individuals that are citizens of the United States;*

N/A (Sumitomo Corporation is traded on Japanese stock exchanges).

- (ii) *The aggregate percentage of total equity and voting stock held by or on behalf of individuals that are citizens of non-U.S. countries;*

13.15%

- (iii) *A list of the countries of citizenship for the beneficial owners of the stock, as well as for any individuals who hold the right to vote the stock. If any of these countries are non-WTO countries, please note the aggregate percentage of total equity and voting stock attributable to the non-WTO investment for each non-WTO country.*

Japan (WTO)

- (iv) *The aggregate percentage of total equity and voting stock held by banks, insurance companies, pension plans and foundations/endowments organized in the United States and controlled by U.S. citizens;*

Approximately 20.57% (see Section II above; total US ownership of 24.22% minus 3.65% held by Liberty Programming Japan Inc.)

- (v) *The aggregate percentage of total equity and voting stock held by banks, insurance companies, pension plans and foundations/endowments controlled by non-U.S. citizens or organized in non-U.S. countries; and*

52.98% (see Section II above; 39.59% Japanese financial institutions + 1.62% securities firms + 11.77% non-US overseas financial firms)

- (vi) *A list of the countries included in category (v) above. If any of these countries are non-WTO countries, please note the aggregate*

percentage of equity and voting stock attributable to the non-WTO investment for each non-WTO country.

Japan (WTO)
UK (WTO)
Saudi Arabia (WTO)
Australia (WTO)
Belgium (WTO)
Singapore (WTO)
Switzerland (WTO)

- (vii) *The aggregate percentage of total equity and voting stock held by private equity funds and management investment companies (i.e., closed end funds and mutual funds) that are organized in the United States and that have their principal places of business in the United States. In making a principal place of business determination, the applicants should include in its determination for each investing entity the country of its world headquarters; tax jurisdiction; the citizenship or principal place of business of its controlling principals, directors and/or investment managers; and country(ies) from which the funds being managed were contributed.*

N/A

- (viii) *The aggregate percentage of total equity and voting stock held by private equity funds and management investment companies (i.e., closed end funds and mutual funds) that are organized in a non-U.S. country or that have their principal places of business in a non-U.S. country; and*

N/A

- (ix) *For the investors in Category (viii) above, a list of the countries where the investors are organized and where they have their principal places of business. If any of these countries are non-WTO countries, please note the aggregate percentage of total equity and voting stock attributable to the non-WTO investment for each non-WTO country. In making a principal place of business determination, the applicant should include in its determination for each investor the country of its world headquarters; tax jurisdiction; the citizenship or principal place of business of its controlling principals, directors and/or investment managers; and country(ies) from which the funds being managed were contributed.*

N/A

- (x) *In making the principal place of business determination for the private equity funds and management investment companies, please confirm that the applicant relied upon the factors listed above in making its determination (i.e., world headquarters; tax jurisdiction; the citizenship or principal place of business of its controlling principals, directors and/or investment managers; and country(ies) from which the funds being managed were contributed). If the applicant used different criteria, please list the factors it considered in making its principal place of business determinations.*

N/A

- b) *For shareholders other than those covered by the questions above (i.e., individuals, banks, insurance companies, pension plans, foundations/endowments, private equity funds and management investment companies), please explain the nature of these investing entities and provide:*

- (i) *The aggregate percentage of total equity and voting stock for such investors that are organized in the United States and that have their principal places of business in the United States. For purposes of determining the investors' principal places of business, please use the five factor test specified in the Foreign Carrier Entry Order, 11 FCC Rcd 3873, 3951, ¶ 207 (1995). See also Foreign Ownership Guidelines, 19 FCC Rcd 22612, 22623 (2004). See final paragraph.*

N/A

- (ii) *The aggregate percentage of total equity and voting stock for such investors that are organized in a non-U.S. country or that have their principal places of business in a non-U.S. country; and*

13.26% (See Section II; 9.61% Japanese corporations + 3.65% Liberty Programming Japan Inc.)

- (iii) *For the investors in Category (ii) above, a list of the countries where the investors are organized and where they have their principal places of business. If any of these countries are non-WTO countries, please note the aggregate percentage commitment attributable to the non-WTO investment for each non-WTO country.*

Japan (WTO)