



WILTSHIRE
& GRANNIS LLP

1200 18TH STREET, N.W., STE. 1200
WASHINGTON, D.C. 20036-2516
U.S.A.

TEL +1 202 730 1337
FAX +1 202 730 1301
WWW.WILTSHIREGRANNIS.COM

ATTORNEYS AT LAW

10 February 2011

BY ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: eLandia International Inc., Pete R. Pizarro, and Amper, S.A., IB Docket No.
10-229*

Dear Ms. Dortch:

On behalf of eLandia International, Inc. (“eLandia”) and Amper, S.A. (“Amper”), we are writing to confirm certain information requested by International Bureau staff with respect to eLandia’s petition for a declaratory ruling finding that it would serve the public interest to permit direct foreign ownership of eLandia in excess of the 25 percent benchmark of Section 310(b)(4) (the “Petition”).¹

Specifically, we confirm that:

1. The reference in the Petition to, “(6) the foreign investors named herein,” includes only the named foreign investors, and does not refer to additional foreign investors.²
2. The references in the Petition exhibits to, “Other shareholders of Fijian nationality,”³ which currently own 2.69 percent of eLandia, refers to the same

¹ See *Petition for Declaratory Ruling Finding that the Public Interest Would be Served by Foreign Investment in eLandia in Excess of the Threshold in Section 310(b)(4) of the Communications Act*, FCC File No. ISP-PDR-20101022-00019 (filed Oct. 22, 2010).

² *Id.* at 13.

³ *Id.* at Exhibits A, B.

WILTSHIRE & GRANNIS LLP

Ms. Marlene Dortch
Federal Communications Commission
10 February 2011
Page 2

shareholders that were similarly referenced in the International Bureau's November 2008 Declaratory Ruling.⁴

3. The approximate distribution of citizenship of Amper's less-than-one percent shareholders follows:

- Spain – 80%
- UK – 7%
- Switzerland – 5%
- Luxembourg – 3%
- Taiwan – 2%
- Belgium – <1%
- France – <1%
- Netherlands – <1%
- United States – <1%

4. With respect to the citizenship of Amper's shareholders, in Spain there is no obligation to disclose the beneficial owner of shares unless that owner holds three percent or more of the capital shares of a listed company. All of Amper's three-percent-or-greater shareholders—as identified in the Petition—are the beneficial owners of those shares. It is likely that some of Amper's less-than-three percent shareholders are institutional nominee shareholders and not beneficial shareholders.

Should you have any questions about this information, please contact Kent Bressie by telephone at +1 202 730 1337 or by e-mail at kbressie@wiltshiregrannis.com.

Respectfully submitted,



Kent D. Bressie
Renee R. Wentzel
*Counsel for eLandia International, Inc. and
Amper, S.A.*

cc: Susan O'Connell
Carrie-Lee Early

⁴ See *AST Telecom, LLC*, Grant of Authority, FCC File No. ISP-PDR-20080401-00006, DA 08-2577 (Int'l Bur., rel. Nov. 26, 2008).