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February 3, 2014

Via IBFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: File No. ISP-PDR-20131218-00013; TeleGuam Holdings, LLC

Dear Ms. Dortch:

TeleGuam Holdings, LLC (“TeleGuam”), hereby amends its Petition for Declaratory Ruling (“Petition”) in the above-referenced proceeding to withdraw its request to permit the foreign investors identified on page 10 of the Petition to increase their equity and voting interests up to a non-controlling 49.99% interest. To the extent that the applicable equity and voting interests held by the foreign investors as set forth on page 10 of the Petition increase in the future, TeleGuam will seek additional specific approval from the Commission for such changes.

In addition, in response to questions from FCC staff, TeleGuam states that the limited partners of Advantage Partners IV, ILP and of AP Cayman Partners II, L.P. are “insulated” according to Section 1.993 of the Commission’s Rules. The limited partners of AP Cayman Partners II General Partner, L.P. and of AP IV GP Partnership, including Taisuke Sasanuma, are “insulated” according to Section 1.993 of the Commission’s Rules. Mr. Sasanuma is not an insulated limited partner of Advantage Partners, LLP.

TeleGuam also corrects a statement on page 4 of its Petition. With respect to AP IV GP Partnership, the Petition should have stated that none of the four individuals holding 99% of the equity of AP IV GP Partnership have an interest of 50% or more in, control of, or negative control of AP IV GP Partnership (rather than AP Cayman Partners II General Partner, L.P.). TeleGuam regrets any confusion caused by this error.

Should you have any questions concerning this information, please do not hesitate to contact us.

Respectfully submitted,



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cc (via email): Susan O’Connell, FCC
David Krech, FCC
Daniel Tydingco

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