

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
PACIFIC TELECOM INC. and PTI) File No. ISP-PDR - _____
PACIFICA INC.)
)
)
Petition to Extend Existing Declaratory
Rulings Under Section 310(b)(4) of the
Communications Act of 1934, as Amended

To: The Commission

**PETITION OF PACIFIC TELECOM INC. AND PTI PACIFICA INC. TO EXTEND
EXISTING DECLARATORY RULINGS UNDER SECTION 310(b)(4) OF THE
COMMUNICATIONS ACT OF 1934, AS AMENDED**

Pacific Telecom Inc. (“Pacific Telecom” or “PTI”) and its indirect wholly-owned subsidiary PTI Pacifica Inc. (“PTI Pacifica”), by their attorneys, hereby request that the Commission extend PTI’s existing declaratory rulings under Section 310(b)(4) of the Communications Act of 1934, as amended (the Act”), to allow PTI Pacifica, an entity with 100 percent indirect foreign ownership, to acquire (in the FCC’s upcoming Auction 103) one or more Upper Microwave Flexible Use Service (“UMFUS”) licenses in the Upper 37 GHz (37.6–38.6 GHz), 39 GHz (38.6–40 GHz), and 47 GHz (47.2–48.2 GHz) bands.¹

PTI already has foreign ownership authorizations to allow PTI Pacifica to indirectly hold numerous types of common carrier licenses. Those authorizations were granted under the Commission’s pre-2013 foreign ownership rules that provide authorization on a service-by-service and location-by-location basis. The FCC’s prior foreign ownership authorizations

¹ See *Incentive Auction of Upper Microwave Flexible Use Service Licenses in the Upper 37 GHz, 39 GHz, and 47 GHz Bands for Next-Generation Wireless Services*, Public Notice, 34 FCC Rcd 5532 (2019) (“*Auction 103 Procedures Public Notice*”).

include a declaratory ruling in 2009 authorizing PTI Pacifica to acquire certain Local Multipoint Distribution Service (“LMDS”) licenses,² which the FCC in 2018 on its own motion converted to UMFUS licenses,³ thereby treating UMFUS licenses as authorized under PTI’s 2009 foreign ownership declaratory ruling. Because the licenses subject to Auction 103 also are classified as UMFUS,⁴ PTI believes that no additional foreign ownership authorization is required to participate in the auction. Nevertheless, this Petition is filed out of an abundance of caution in case it is deemed needed.

I. THE FCC ALREADY HAS GRANTED PTI PACIFICA FOREIGN OWNERSHIP AUTHORIZATION TO HOLD SEVERAL TYPES OF COMMON CARRIER LICENSES, INCLUDING UMFUS LICENSES

The applicant in Auction 103 is PTI Pacifica, which is incorporated in the Commonwealth of the Northern Mariana Islands (“CNMI”), a self-governing commonwealth in political union with and under the sovereignty of the United States of America. PTI Pacifica is directly owned (100 percent) by The Micronesian Telecommunications Corporation (“MTC”), also a CNMI corporation, which is the incumbent local exchange carrier in CNMI.⁵ MTC in turn is owned (100 percent) by PTI, also a CNMI corporation.

PTI is owned 85 percent by Prospector Pacific Investments Inc. (“PPII”), a CNMI corporation, and 15 percent by SK Telecom Co. Ltd., a publicly-traded South Korea corporation listed on the Korea Stock Exchange. PPII is owned 100 percent by Citadel Pacific Holdings Ltd.

² *IT&E Overseas, Inc.*, Memorandum Opinion and Order and Declaratory Ruling, 24 FCC Rcd 5466 (2009) (“*2009 Declaratory Ruling*”).

³ For example, see the ULS license records for PTI Pacifica license WRAY326 where the Administration (“ADMIN”) page explains “[t]his license was created on Apr 10, 2018 as a result of conversion of an incumbent license WPLM240 to the Upper Microwave Flexible Use Service (UU)”: <https://wireless2.fcc.gov/UlsApp/UlsSearch/licenseAdminSum.jsp?licKey=4019562> (last visited Oct. 21, 2019).

⁴ See *Auction 103 Procedures Public Notice*, 34 FCC Rcd 5532.

⁵ PTI Pacifica and its direct parent MTC collectively operate under the name IT&E.

(“CPHL”), a Cayman Island corporation formerly known as Prospector Investments Ltd. CPHL primarily is owned by two citizens of the Philippines, Ricardo C. Delgado (53.99 percent) and his son Jose Ricardo Delgado (36.25 percent). Classroom Investments Inc. (“CII”), a Canadian corporation, holds 9.76 percent of CPHL. CCI is owned 100 percent by the Ontario Teachers’ Pension Plan, a Canadian entity. No other party holds a 10 percent or greater, or a controlling, direct or indirect ownership interest in CPHL (or PTI Pacifica).

The FCC on five occasions has issued foreign ownership declaratory rulings authorizing PTI’s wholly-owned indirect subsidiary PTI Pacifica Inc. to hold different types of FCC common carrier licenses. The FCC’s 2003 ruling covered a cellular license and a common carrier earth station license in the CNMI.⁶ A 2006 ruling approved a PCS license covering both CNMI and Guam.⁷ A 2008 ruling approved the acquisition at auction of a 700 MHz license covering CNMI and Guam.⁸ A 2009 ruling approved the acquisition of common carrier LMDS and earth station licenses in CNMI and Guam.⁹ The most recent ruling in 2010 authorized PTI to accept up to a 40 percent indirect, non-controlling equity and voting interest by a specified foreign investor.¹⁰

⁶ *Bell Atlantic New Zealand Holdings, Inc.*, Order and Authorization, 18 FCC Rcd 23140 (2003) (“2003 Acquisition Order”).

⁷ *Application of Bell Atlantic New Zealand Holdings, Inc., Assignor, and GTE Pacifica, Inc., Assignee*, Order, 21 FCC Rcd 12079, 12085 ¶ 17 (2006).

⁸ File No. ISP-PDR-20071203-00017. *See International Authorizations Granted*, Public Notice, 23 FCC Rcd 8372, 8373 (2008).

⁹ *2009 Declaratory Ruling*, 24 FCC Rcd 5466.

¹⁰ File No. ISP-PDR-20100720-00015. *See International Authorizations Granted*, Public Notice, 25 FCC Rcd 16939, 16940 (2010). The specified foreign investor subsequently divested all its non-controlling interests in PTI.

As noted above, the FCC on its own motion converted two of PTI Pacifica's 28 GHz LMDS licenses into UMFUS licenses in 2018,¹¹ thereby treating the UMFUS licenses as authorized under PTI's 2009 foreign ownership declaratory ruling.

II. INFORMATION REQUIRED BY 47 C.F.R. § 1.5001

Pursuant to Section 1.5001 of the Commission's rules, PTI and PTI Pacifica provide the following information in support of this Petition.

Section 1.5001(a): Petitioners' Contact Information, FRN, Place of Organization, and Type of Business, and Certification Information

Petitioners:

Name: **Pacific Telecom Inc.**
FRN: 0006243554
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Telephone: 670-682-0744
Fax: 670-235-4932
Email: Steven.Carrara@itehq.net
Citizenship: CNMI
Entity Type: Corporation
Type of Business: Holding Company
Certifying Officer: Steven Carrara, General Counsel

Name: **PTI Pacifica Inc.**
FRN: 0004339933
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Telephone: 670-682-0744
Fax: 670-235-4932
Email: Steven.Carrara@itehq.net
Citizenship: CNMI
Entity Type: Corporation
Type of Business: Wireless Service Provider
Certifying Officer: Steven Carrara, General Counsel

¹¹ *Wireless Telecommunications Bureau Announces Conversion of Incumbent 28 GHz and 39 GHz Licenses to the Upper Microwave Flexible Use Service*, Public Notice, 33 FCC Rcd 5055 (2018).

Section 1.5001(b): Legal Counsel Contact Information

Name: Timothy J. Cooney
Brian W. Higgins
Jennifer L. Kostyu
Address: Wilkinson Barker Knauer, LLP
1800 M Street, N.W., Suite 800N
Washington, D.C. 20036
Telephone: 202.783.4141
Fax: 202.783.5851
Email: tcooney@wbklaw.com
bhiggins@wbklaw.com
jkostyu@wbklaw.com

Section 1.5001(c)(1): Licensees Covered by Declaratory Ruling

The declaratory ruling is requested for PTI Pacifica, the licensee of cellular, PCS, lower 700 MHz, LMDS, UMFUS, and private microwave licenses.¹² Prospectively, PTI Pacifica seeks authority for all types of FCC licenses and for all geographic areas.

Section 1.5001(c)(2): Associated Applications

PTI Pacifica is applying to participate in Auction 103 (Application Form 175 No. 0008792135) in order to bid on UMFUS licenses in CNMI and Guam.

Section 1.5001(d): Type of Declaratory Ruling

Petitioners seek a declaratory ruling pursuant to Section 1.5000(a)(1) of the Commission's rules.

Sections 1.5001(e) and (g) – Direct Ownership Information: Equity/Voting Interests of 10 Percent or More

A. Direct Ownership

The following U.S. entity holds a 100 percent direct ownership in Auction 103 applicant, PTI Pacifica:

Name: **The Micronesian Telecommunications Corporation**
FRN: 0004350252
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Telephone: 670-682-0744
Fax: 670-235-4932
Email: Steven.Carrara@itehq.net
Citizenship: CNMI

¹² PTI Pacifica also formerly held earth station licenses, but it surrendered them earlier in 2019.

Entity Type: Corporation
Type of Business: Incumbent Local Exchange Carrier
Percent Held: 100 percent equity/100 percent voting (direct) in PTI Pacifica

B. Sections 1.5001(f) and (g) – Indirect Ownership Information

The following individuals and entities hold indirect ownership interests in PTI Pacifica. The percentages listed are calculated in accordance with the principles set forth in Section 1.5002 of the Commission’s rules.

Name: **Ricardo C. Delgado**
Address: 6758 Ayala Ave. 4/F SGV II Building
Makati City, 1200
Citizenship: Philippines
Principal Business: Business Owner
Entity Type: Individual
Percentage Held: 53.99 percent direct equity and 100 percent direct voting in Citadel Pacific Ltd. and 45.89 percent indirect equity and 100 percent indirect voting in Pacific Telecom Inc. and PTI Pacifica Inc.

Name: **Jose Ricardo Delgado**
Address: 6758 Ayala Ave. 4/F SGV II Building
Makati City, 1200
Citizenship: Philippines
Principal Business: Business Owner
Entity Type: Individual
Percentage Held: 36.25 percent direct equity/voting in Citadel Pacific Ltd. and 30.81 percent indirect equity/voting in Pacific Telecom Inc. and PTI Pacifica Inc.

Name: **Citadel Pacific Ltd.**
Address: c/o Trident Trust (Cayman) Ltd. One Capitol Place P.O. Box 847
Grand Cayman, KY11103
Citizenship: Cayman Islands
Principal Business: Holding Company
Entity Type: Corporation
Percentage Held: 85 percent indirect equity and 100 percent indirect voting in Pacific Telecom Inc. and 85 percent indirect equity and 100 percent indirect voting in PTI Pacifica Inc.

Name: **Prospector Pacific Investments Inc. (“PPI”)**
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950
Citizenship: CNMI
Entity Type: Corporation

Type of Business: Holding Company
Percent Held: 85 percent direct equity and 100 percent direct in voting in Pacific Telecom Inc. and 85 percent indirect equity and 100 percent indirect voting in PTI Pacifica Inc.

Name: **Pacific Telecom Inc.**
Address: PO Box 500306 CK
Tekken Street, Susupe Village
Saipan, MP 96950

Citizenship: CNMI
Entity Type: Corporation
Type of Business: Holding Company
Percent Held: 100 percent direct equity/voting in The Micronesian Telecommunications Corporation and 100 percent indirect equity/voting in PTI Pacifica Inc.

Name: **SK Telecom Co. Ltd.**
Address: SK T-Tower, 65 Eulji-ro, Jung-gu
Seoul, South Korea 100999
Citizenship: South Korea
Principal Business: Wireless telecommunications operator
Entity Type: Corporation
Percentage Held: 15 percent direct equity/voting in Pacific Telecom Inc. and 15 percent indirect equity/voting in PTI Pacifica Inc.

Name: **Classroom Investments Inc.**
Address: 5650 Yonge Street, Suite 300
Toronto, A6 M2M 4H5
Citizenship: Canada
Principal Business: Investment Company
Entity Type: Corporation
Percentage Held: 9.76 percent direct equity/voting in Citadel Pacific, and 8.3 percent indirect equity/voting in Pacific Telecom Inc. and in PTI Pacifica Inc. (9.76 percent x 85 percent = 8.3 percent)

Name: **Ontario Teachers' Pension Plan**
Address: 5650 Yonge Street, Suite 300
Toronto, A6 M2M 4H5
Citizenship: Canada
Principal Business: Pension Plan
Entity Type: Pension Plan
Percentage Held: 100 percent interest in Classroom Investments Inc.; 9.76 percent indirect equity/voting in Citadel Pacific, and 8.3 percent indirect equity/voting in Pacific Telecom Inc. and in PTI Pacifica Inc. (9.76 percent x 85 percent = 8.3 percent)

Sections 1.5001(h)(1) and (i) – Estimate of Aggregate Foreign Ownership

Non-U.S. individuals and entities indirectly control 100 percent of the voting and equity interests of PTI Pacifica, as indicated in Exhibit A, the most recent FCC Form 602 for PTI Pacifica.

The circumstance that prompted the filing of this Petition is the potential that the 2009 foreign ownership authorization granted to PTI for LMDS licenses that the FCC subsequently converted to UMFUS might not be interpreted as encompassing the UMFUS licenses subject to Auction 103. A demonstration that the public interest would be served by granting the Petition is set forth in Section III below.

Section 1.5001(h)(2) – Ownership and Control Structure Diagram

Exhibit A is the most recent FCC Form 602 for PTI Pacifica that includes a diagram of its ownership structure. This Petition will be supplemented by the amended FCC Form 175 for Auction 103, which includes identification of all interested parties, after it is filed.

Section 1.5001(i)-(k) – Request for Specific Approval

The Petitioners request specific approval for the following foreign individuals and entities that will indirectly hold more than five percent of the equity and/or voting interests in PTI Pacifica:¹³

Name: **Ricardo C. Delgado**
Address: 6758 Ayala Ave. 4/F SGV II Building
Makati City, 1200
Citizenship: Philippines
Principal Business: Business Owner
Entity Type: Individual
Percentage Held: 53.99 percent direct equity and 100 percent voting in Citadel Pacific Ltd.; and 45.89 percent indirect equity (53.99 percent x 85 percent = 45.89 percent) and 100 percent voting in Pacific Telecom Inc. and in PTI Pacifica Inc.

Name: **Jose Ricardo Delgado**
Address: 6758 Ayala Ave. 4/F SGV II Building
Makati City, 1200
Citizenship: Philippines
Principal Business: Business Owner
Entity Type: Individual
Percentage Held: 36.25 percent direct equity/voting in Citadel Pacific Ltd. and 30.81 percent indirect equity/voting in Pacific Telecom Inc. and PTI Pacifica Inc. (36.25 percent x 85 percent = 30.81 percent)

¹³ The percentages listed are calculated in accordance with the principles set forth in Section 1.5002 of the Commission's rules. Specific approval is not requested for any CNMI (U.S.) entity in the ownership chain.

Name: **Citadel Pacific Ltd.**
Address: c/o Trident Trust (Cayman) Ltd. One Capitol Place P.O. Box 847
Grand Cayman, KY11103
Citizenship: Cayman Islands
Principal Business: Holding Company
Entity Type: Corporation
Percentage Held: 85 percent indirect equity and 100 percent indirect voting in Pacific Telecom Inc. and in PTI Pacifica Inc.

Name: **SK Telecom Co. Ltd.**
Address: SK T-Tower, 65 Eulji-ro, Jung-gu
Seoul, South Korea 100999
Citizenship: South Korea
Principal Business: Wireless telecommunications operator
Entity Type: Corporation
Percentage Held: 15 percent direct equity/voting in Pacific Telecom Inc. and 15 percent indirect equity/voting in PTI Pacifica Inc.

Name: **Classroom Investments Inc.**
Address: 5650 Yonge Street, Suite 300
Toronto, A6 M2M 4H5
Citizenship: Canada
Principal Business: Investment Company
Entity Type: Corporation
Percentage Held: 9.76 percent direct equity/voting in Citadel Pacific, 8.3 percent indirect equity/voting in Pacific Telecom Inc. and in PTI Pacifica Inc. (9.76 percent x 85 percent = 8.3 percent)

Name: **Ontario Teachers' Pension Plan**
Address: 5650 Yonge Street, Suite 300
Toronto, A6 M2M 4H5
Citizenship: Canada
Principal Business: Pension Plan
Entity Type: Pension Plan
Percentage Held: 100 percent interest in Classroom Investments Inc.; 9.76 percent indirect equity/voting in Citadel Pacific, 8.3 percent indirect equity/voting in Pacific Telecom Inc. and in PTI Pacifica Inc. (9.76 percent x 85 percent = 8.3 percent)

Sections 1.5001(k)(2) and (i) – Requests for Advance Approval

Petitioners request application of the routine terms and conditions set forth in Section 1.5004 of the Commission's rules. Petitioners request advance approval for the currently controlling individual, Ricardo C. Delgado, and currently controlling foreign company Citadel Pacific Ltd. to increase their indirect interests in PTI Pacifica up to 100 percent of the indirect equity and voting interests. Advance approval is also requested for Jose Ricardo Delgado to increase his indirect interests in PTI Pacifica up to and including a 49.9 percent non-controlling indirect equity

and/or voting interest in PTI Pacifica and for Classroom Investments Inc., Ontario Teachers' Pension Plan, and SK Telecom Co. Ltd. to increase its respective indirect interest in PTI Pacifica up to and including a 49.9 percent non-controlling indirect equity and/or voting interests.

III. GRANT OF THIS PETITION IS IN THE PUBLIC INTEREST

The Commission has recognized that foreign investment has been and will continue to be an important source of financing for U.S. telecommunications companies, fostering technical innovation, economic growth, and job creation.¹⁴ For almost two decades, the Commission has consistently permitted non-U.S. individuals and entities to hold up to 100 percent of the equity and voting power in holders of FCC licenses subject to Section 310(b)(4) of the Act.¹⁵ The FCC has granted PTI foreign ownership authorizations up to 100 percent on five prior occasions. The public interest will be served by the Commission issuing a declaratory ruling extending its current foreign ownership authorizations for PTI to allow PTI Pacifica to acquire additional UMFUS licenses in Auction 103.

IV. REQUEST FOR NATIONAL SECURITY AGREEMENT CONDITION

Petitioners request that the Commission condition grant of the requested authority on PTI's continued compliance with the national security agreement between PTI and certain Executive Branch agencies, which was incorporated as an appendix to the *2003 Acquisition Order*.¹⁶

¹⁴ See *Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended*, Second Report and Order, 28 FCC Rcd 5741, 5744 ¶ 3 (2013).

¹⁵ See, e.g., *Intelsat, Ltd., Transferor, and Zeus Holdings Ltd., Transferee*, Order and Authorization, 19 FCC Rcd 24820 (2004); *Applications of Comsat General Corp., Lockheed Martin Global Telecommunications LLC, Comsat New Services, Inc., Intelsat LLC, and Intelsat MTC LLC to Assign Licenses and Authorizations and Request for a Declaratory Ruling on Foreign Ownership*, Public Notice, 19 FCC Rcd 21216 (2004); *Voicestream Wireless Corp.*, Memorandum Opinion and Order, 16 FCC Rcd 9779 (2001).

¹⁶ See *2003 Acquisition Order*, 18 FCC Rcd at 23167 *et sequens*.

V. CONCLUSION

For the foregoing reasons, the Commission should issue a declaratory ruling that the public interest would not be served by prohibiting PTI Pacifica from acquiring UMFUS licenses in Auction 103.

Respectfully submitted,

**PACIFIC TELECOM INC.
PTI PACIFICA INC.**

By: _____ /s/
Timothy J. Cooney
Brian W. Higgins
Jennifer L. Kostyu

WILKINSON BARKER KNAUER, LLP
1800 M Street, NW, Suite 800N
Washington, D.C. 20036
(202) 783-4141
Its Attorneys

October 21, 2019

EXHIBIT A

**FCC Form 602
Main Form**

**FCC Ownership Disclosure Information for the
Wireless Telecommunications Services**

Approved by OMB
3060 – 0799
See instructions for
Public burden estimate
Submitted
10/21/2019 at 11:38 AM
File Number:
0008842414

Filing Type

1) <input checked="" type="checkbox"/> Current Filing	<input type="checkbox"/> Proposed Filing
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Filer Information

2) First Name (if individual):	MI:	Last Name:	Suffix:
3) Filer Name (if entity): PTI Pacifica Inc.			4) FCC Registration Number (FRN): 0004339933

5) Contact Information

Name and Address: Steven Carrara PTI Pacifica Inc. PO BOX 500306 CK Tekken Street, Susupe Village Saipan, MP 96950	Telephone Number: 670-682-0744
	Fax Number: 670-235-4932
	E-mail Address: Steven.Carrara@itehq.net

Related FCC Regulated Businesses of Filer

6a) Name of all FCC-Regulated Businesses owned by Filer (use additional sheets, if necessary):	6b) Principal Business:	6c) FCC Registration Number (FRN):	6d) Percent of Interest Held:

Signature

7) Typed or Printed Name of Party Authorized to Sign

First Name: Steven	MI:	Last Name: Carrara	Suffix:
Title: General Counsel			
Signature: Steven Carrara			Date: 10/21/2019

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1) AND/ OR FORFEITURE (U.S. Code, Title 47, Section 503).

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Citadel Pacific Holdings Ltd.		3) FCC Registration Number(FRN): 0008601593	
4) Disclosable Interest Holder's Address: c/o Trident Trust (Cayman) Ltd. One Capitol Place P.O. Box 847 Grand Cayman, KY11103			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Corporation	7) Percent of Interest Held in Filer: 100.00	
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Cayman Islands		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Pacific Telecom Inc.	Telecommunications	0006243554	85.00
PTI Pacifica Inc.	Telecommunications	0004339933	85.00
The Micronesian Telecommunications Corporation	I L E C	0004350252	85.00

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual): Jose Ricardo	MI:	Last Name: Delgado	Suffix:
2) Disclosable Interest Holder's Name (if entity):		3) FCC Registration Number(FRN): 0008601213	
4) Disclosable Interest Holder's Address: 6758 Ayala Ave. 4/F SGV II Building Makati City, 1200			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Individual		7) Percent of Interest Held in Filer: 30.81
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting		9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Philippines	

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Pacific Telecom Inc.	Telecommunications	0006243554	30.81
PTI Pacifica Inc.	Telecommunications	0004339933	30.81
The Micronesian Telecommunications Corporation	ILEC	0004350252	30.81

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Pacific Telecom Inc.		3) FCC Registration Number(FRN): 0006243554	
4) Disclosable Interest Holder's Address: Tekken Street, Susupe Village P.O. Box 500306 CK Saipan, MP 96950			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Corporation	7) Percent of Interest Held in Filer: 100.00	
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United States, North Mariana Islands		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
PTI Pacifica Inc.	Telecommunications	0004339933	100.00
The Micronesia Telecommunications Corporation	ILEC	0004350252	100.00

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Prospector Pacific Investments Inc.		3) FCC Registration Number(FRN): 0021523808	
4) Disclosable Interest Holder's Address: Tekken Street, Susupe Village P.O. Box 500306 CK Saipan, MP 96950			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Corporation	7) Percent of Interest Held in Filer: 100.00	
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United States, North Mariana Islands		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Pacific Telecom Inc.	Telecommunications	0006243554	85.00
PTI Pacifica Inc.	Telecommunications	0004339933	85.00
The Micronesian Telecommunications Corporation	ILEC	0004350252	85.00

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual): Ricardo	MI: C	Last Name: Delgado	Suffix:
2) Disclosable Interest Holder's Name (if entity):		3) FCC Registration Number(FRN): 0008601015	
4) Disclosable Interest Holder's Address: 6758 Ayala Ave. 4/F SGV II Building Makati City, 1200			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Individual	7) Percent of Interest Held in Filer: 100.00	
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Philippines		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Pacific Telecom Inc.	Telecommunications	0006243554	45.89
PTI Pacifica Inc.	Telecommunications	0004339933	45.89
The Micronesian Telecommunications Corporation	ILEC	0004350252	45.89

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): SK Telecom Co., Ltd.		3) FCC Registration Number(FRN): 0024095903	
4) Disclosable Interest Holder's Address: SK T-Tower, 65 Eulji-ro, Jung-gu Seoul, 100999			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Indirect Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Corporation	7) Percent of Interest Held in Filer: 15.00	
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: Korea (South)		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
Pacific Telecom Inc.	Telecommunications	0006243554	15.00
PTI Pacifica Inc.	Telecommunications	0004339933	15.00
The Micronesian Telecommunications Corporation	ILEC	0004350252	15.00

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): The Micronesia Telecommunications Corporation		3) FCC Registration Number(FRN): 0004350252	
4) Disclosable Interest Holder's Address: Tekken Street, Susupe Village P.O. Box 500306 CK Saipan, MP 96950			
5) Type of Interest in Filer () (refer to Instructions for a list of codes): Direct Ownership Interest in Filer	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): Corporation	7) Percent of Interest Held in Filer: 100.00	
8) Disclosable Interest Holder's Type of Ownership () (refer to instructions for a list of codes): Common Stock: Voting	9) Disclosable Interest Holder's Country of Citizenship or Jurisdiction of Formation: United States, North Mariana Islands		

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

10a) Name and address of all FCC-Regulated Businesses owned by the Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary)	10b) Principle Business	10c) FCC Registration Number (FRN)	10d) Percent of Interest Held
PTI Pacifica Inc.	Telecommunications	0004339933	100.00

Attachment(s):

Type	Description	Date Entered
I	Indirect Ownership	201904

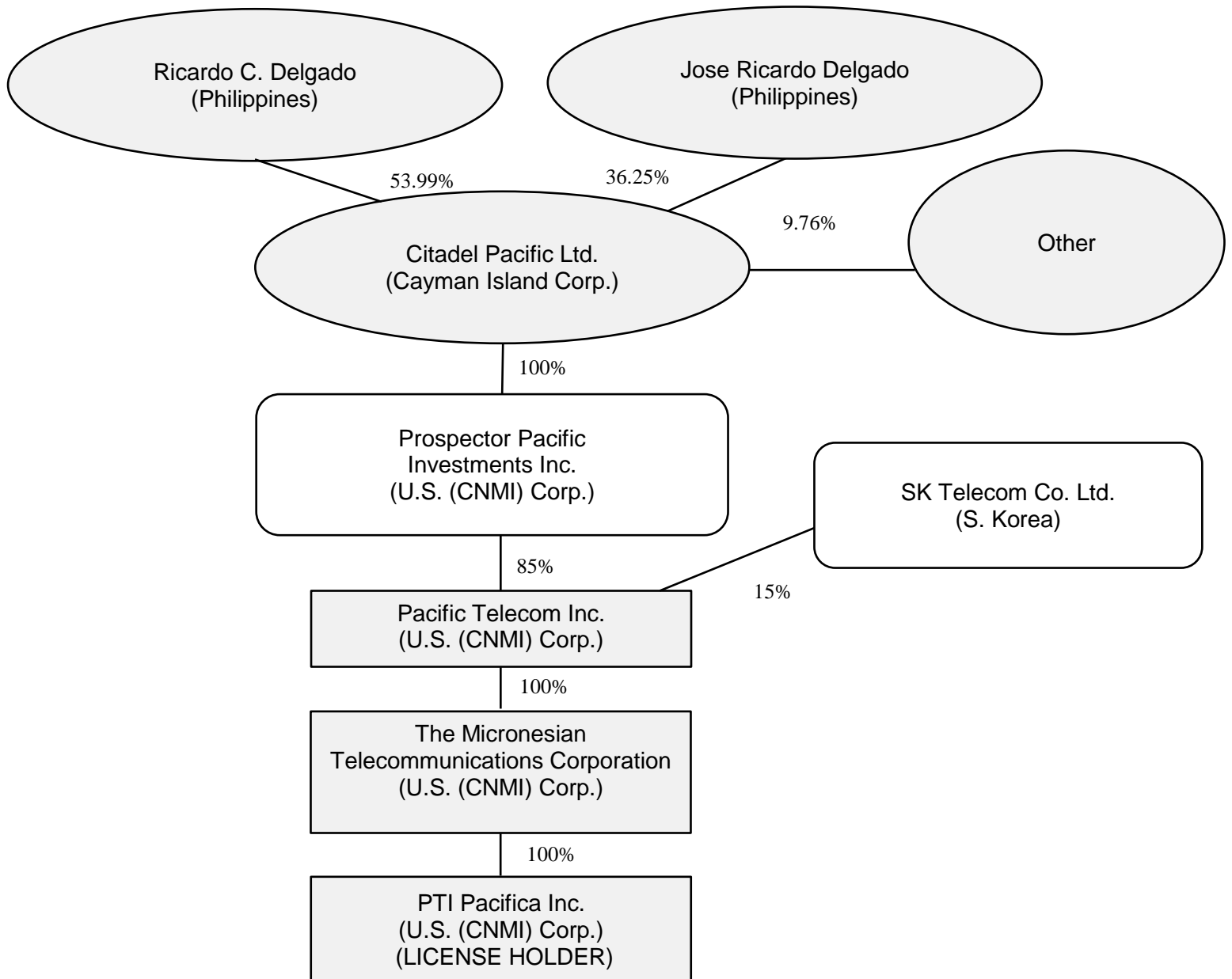
INDIRECT OWNERSHIP

PTI Pacifica Inc., the filer, is incorporated in the U.S. territory of the Commonwealth of the Northern Marianas (CNMI). The filer is directly owned (100%) by The Micronesian Telecommunications Corporation, a CNMI corporation, which in turn is owned (100%) by Pacific Telecom Inc. (PTI) a CNMI corporation.

PTI is owned 85% by Prospector Pacific Investments Inc. (PPII), a CNMI corporation, and 15% by SK Telecom Co. Ltd., a publicly-traded South Korea corporation listed on the Korea Stock Exchange (KRX). PPII is owned 100% by Citadel Pacific Holdings Ltd. (CPHL), a Cayman Island corporation formerly known as Prospector Investments Ltd. CPHL primarily is owned by two citizens of the Philippines, Ricardo C. Delgado (53.99%) and Jose Ricardo Delgado (36.25%).¹ No other party holds a 10% or greater or controlling indirect ownership interest in CPHL (or the filer).

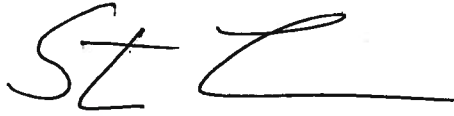
¹ For purposes of preparing the FCC Form 602, ownership interests in the filer which exceed 50%, or that represent actual control, are reported as 100% interests. 47 C.F.R. § 1.2112(a)(6).

PTI Pacifica Inc. Ownership Structure



CERTIFICATION UNDER 47 C.F.R. § 1.5001(i)

On behalf of Petitioners Pacific Telecom Inc. and PTI Pacifica Inc., I, Steven Carrara, certify under penalty of perjury that to the best of my knowledge and belief the information in this Petition is true and correct and in accordance with the provisions of Section 1.16 and 1.5001 of the rules of the Federal Communications Commission.

A handwritten signature in black ink, appearing to read 'SZ' followed by a long horizontal line.

Steven Carrara
General Counsel
Pacific Telecom Inc. and PTI Pacifica Inc.
October 21, 2019