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Federal Communications Commission
Office of Secretary

October 6, 2005

Via HAND DELIVERY

COPY

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20054

Re: Update to Reliance Communications, Inc. Section 214 Authorization (ITC-214-20021107-00535)

Dear Ms. Dortch:

I am writing to update the ownership information provided in the original application for Section 214 Authorization (ITC-214-20021107-00535) submitted by Reliance Communications, Inc. ("RCI").¹ Pursuant to the authority granted in its Section 214 authorization, RCI provides international telecommunications services.

Specifically, on August 27, 2005, Ambani Enterprises Pvt. Ltd. acquired an aggregate 20.4543% indirect interest in RCI.² Ambani Enterprises Pvt. Ltd. acquired this 20.4543% stake in RCI by acquiring a 5.37% direct interest and a 15.0843% indirect interest³ in Reliance Infocomm Limited

¹ See 47 C.F.R. § 63.21(a) (requires that carriers update certain information provided in their Section 214 applications, if this information changes).

² See 47 C.F.R. § 63.18(h) (requires that the applicant provide certain information for any person or entity that directly or indirectly holds a 10% or more of the equity of the applicant).

³ Ambani Enterprises Pvt. Ltd. acquired this 15.0843% indirect interest in RIC by acquiring a 33% interest in Reliance Communications Infrastructure Limited ("RCIL"), which in turn holds an aggregate 45.71% interest in RIC (.33 x 45.71% = 15.0843%).

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("RIC"). RIC indirectly holds 100% of RCI. Thus, by acquiring an aggregate 20.4543% interest in RIC, Ambani Enterprises Pvt. Ltd. acquired an aggregate indirect, non-controlling 20.4543% interest in RCI.

Ambani Enterprises Pvt. Ltd. is incorporated under the laws of India and its principal business is holding strategic investments. Its principal shareholder is an individual named Mr. Anil Ambani, who holds a 98% interest in the company. As a result of the transactions described above, Mr. Ambani now also holds an indirect non-controlling interest in RCI of greater than 10%. The addresses for Ambani Enterprises Pvt. Ltd. and Mr. Ambani are as follows:

Anil Ambani Enterprises Pvt. Ltd.
3rd Floor, Reliance Energy Center
Santacruz (E)
Mumbai - 400 055

Mr. Anil Ambani
Reliance Center,
19, Walchand Hirachand Marg, Ballard Estate
Mumbai – 400 038.


Attached to this letter is a chart illustrating the current ownership structure of RCI, including the interests acquired by Ambani Enterprises Pvt. Ltd.⁴ Also attached is a certification signed by Thakur Sharma, the President of RCI, certifying that the ownership information provided in this letter and depicted in the accompanying chart is true and correct.

⁴ The chart reflects the current chain of ownership above RCI, the Section 214 licensee. In this respect, the chart includes the transaction described in the Notice of *Pro Forma* Transfer of Control (ITC-T/C-20050823-00341) that RCI submitted on August 22, 2005, whereby RCI provided notice that Reliance Industries Limited ("RIL"), the ultimate parent company controlling RCI, converted preference shares into additional equity in RIC, thereby expanding its *de facto* control over RCI into *de jure* control as well. Issuance of a Public Notice concerning the *pro forma* notice is pending. The chart does not include the proposed transaction described in the Application for Transfer of Control (ITC-T/C-20050915-00370) submitted by RCI on September 15, 2005, seeking authority for RIL to transfer all of its interests in (and therefore control over) RCI to Reliance Communications Ventures Limited. Issuance of a Public Notice concerning the transfer of control application is pending as well.

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Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

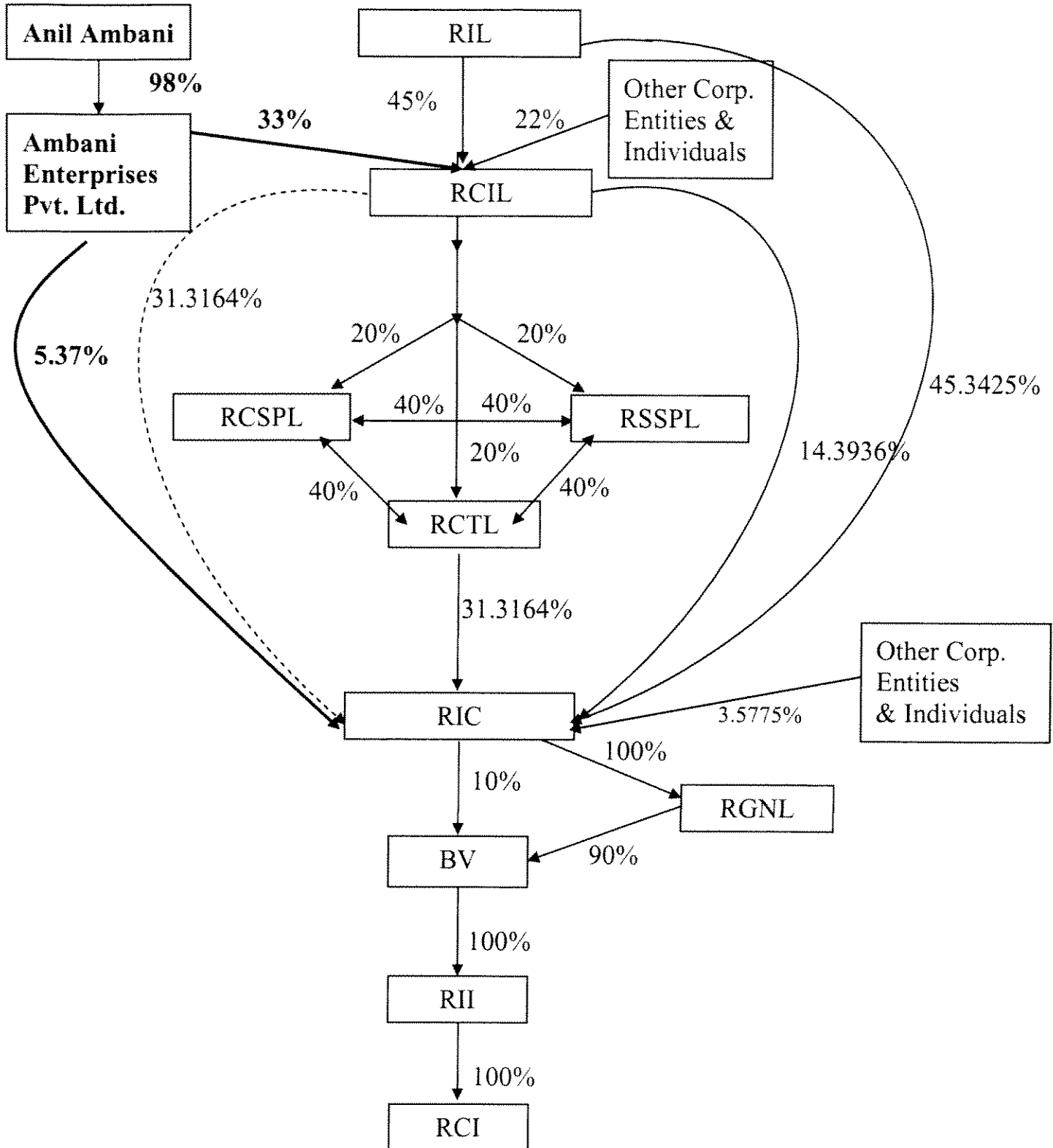
A handwritten signature in black ink, appearing to read "Christopher C. Tai". The signature is fluid and cursive, with a prominent "C" and "T".

Christopher C. Tai

cc: Jodi Cooper

ATTACHMENT 1

CURRENT STRUCTURE
(Changes Shown In Bold)



- “RIL” is Reliance Industries Limited
- “RCIL” is Reliance Communications Infrastructure Limited
- “RCSPL” is Reliance Communications Solutions Private Limited
- “RSSPL” is Reliance Software Solutions Private Limited
- “RCTL” is Reliance Communications Technologies Limited
- “RIC” is Reliance Infocomm Limited
- “RGNL” is Reliance Gateway Net Limited
- “BV” is Reliance Infocom BV
- “RII” is Reliance Infocom, Inc.
- “RCI” is Reliance Communications, Inc., the International Section 214 licensee

CERTIFICATION OF THAKUR SHARMA

I, Thakur Sharma, hereby certify that the foregoing ownership information is true and correct to the best of my knowledge, information and belief.

Executed on October 6, 2005.



Thakur Sharma
President
Reliance Communications, Inc.