

International Bureau

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Re: Section 214 & 310(b)(4) and Cable Landing License Application

Dear Sir or Madam:

Please review the following applications and advise us whether you have any national security, law enforcement, foreign policy or trade concerns by **C.O.B. July 18, 2007**, because we are prepared to take action on these applications. **Electronic filed (e-file) applications are able to be viewed by accessing www.fcc.gov/ibfs and searching by the file number.**

ITC-214-20070621-00241(e-file)

168 Global Networks LLC's application for authority to provide global facilities-based and resale services between the United States and permissible international points. Two citizens of the **Philippines**, each of whom owns 51% and 49% of the applicant, respectively.

ITC-214-20070627-00248(e-file)

Nortel Networks Corp.'s application for resale authority between the United States and permissible international points. Applicant is incorporated and located in **Canada**.

ITC-214-20070626-00246(e-file)

SanCom Wireless Puerto Rico License Co., LLC's application for resale authority between the United States and permissible international points. Applicant is indirectly 17.2% owned by a **Bermuda** corporation, and indirectly 19.3% owned by a **Cayman Island's** corporation.

Petitioner seeks approval for the following individuals and entities to hold indirect equity and voting interests in SkyWave, in addition to the shareholders previously approved in the 2004 Ruling: Mahkota SA (organized in **Luxembourg** with a principal place of business in Luxembourg or Brunei) (25.16%); Partenon Holdings, LLC (U.S.-organized with a principal place of business in **Brazil**) (2.52%); GTI V, LP and GTI V (NR), LP (both organized and principally conducting business in **Canada** (collectively, 8.37%); 1168433 Ontario, Inc. (organized and principally conducting business in Canada) (0.26%); and **four named Canadian citizens** (collectively, 0.69%). SMCI shareholders approved in the 2004 Ruling continue to hold equity and voting interests as specified in the petition, at levels below those approved in the 2004 Ruling.

Petitioner also requests approval for warrants and stock options for SMCI so that these convertible interests can be redeemed without further Commission approval under section 310(b)(4). In particular, MMV Financial, a **Canadian** corporation with its principal place of business in Canada, holds warrants that, if exercised, would represent an equity and voting interest of approximately 1.29% based on the current number of outstanding shares of SMCI. SkyWave also seeks approval for stock options that have been granted but not exercised under SMCI's employee stock option plan. The named individuals that hold granted stock options are citizens of **Canada, Brazil, China, Peru, Singapore, Hong Kong, and Mexico**.

Petitioner asserts that, pursuant to the rules and policies established in the Commission's Foreign Participation Order, 12 FCC Rcd 23891 (1997), Order on Reconsideration, 15 FCC Rcd 18158 (2000), the indirect foreign equity and voting interests for which it seeks approval are consistent with the public interest.

If we do not hear from you by **C.O.B. July 18, 2007**, we will assume that you do not have any concerns with the above listed applications.

Sincerely,



George Li, Deputy Chief
Policy Division