

October 4, 2007

Via U.S. Mail

International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Pacific Networks Corp.; International Section 214 Application (ITC-214-20070907-00368)

Dear Sir or Madam:

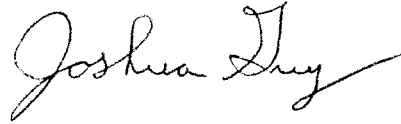
Pacific Networks Corp. ("Pacific Networks"), by its attorney, hereby provides the following supplement to its International Section 214 Application (ITC-214-20070907-00368) filed September 7, 2007 ("Application"). Several intermediary companies were inadvertently left out of the ownership chain of the Applicant in the response to Question 14, included in Attachment 2 to the Application. Specifically, this includes the addition of Rockhampton Investments Limited, Bloomfield Enterprises Corp., Earnplex Corporation, and Honpville Corporation. Changes were made in accordance with these additions to the information provided for Larry Yung Chi Kin and Heedon Corporation. These additions do not affect the ultimate ownership of the Applicant, however, they should be included due to ten percent or greater ownership of the Applicant in the ownership chain. Included with this letter is a revised Attachment 2 to the Application reflecting these additions.

We have also included a revised ownership chart designated Exhibit A, which was developed to respond to inquiries from the Department of Homeland Security ("DHS"). This ownership chart reflects the additional ten percent or greater owners discussed above, as well as several smaller owners that were included to respond to ownership inquiries from DHS.

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Thank you for your assistance. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua T. Guyan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joshua T. Guyan

Attachments

cc: Mikelle Morra, Policy Division, International Bureau, Federal Communications Commission (By Email)

Response to Question 14

The following entities directly or indirectly own 10 percent or more of the Applicant (*see* Exhibit A):

Pacific Choice International Limited

Address: c/o 8/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principal Business: Investment holding company for systems integration business
focused in serving telecommunications operators
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls 100% of Applicant

CITIC 1616 Holdings Limited

Address: 8/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Holding company and performs sales and marketing functions
primarily for affiliated companies
Place of Incorporation: Hong Kong
Shareholding in Applicant: Directly owns and controls 100% of Pacific Choice International
Limited (resulting in 100% indirect ownership and control of
Applicant)

Ease Action Investments Corp.

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls approximately 50% of CITIC 1616
Holdings Limited (resulting in 100% attributable interest in and
control of Applicant pursuant to the note to Section 63.18(h)). *See*
47 C.F.R. § 63.18(h).

Ferretti Holdings Corp.

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company

Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls 100% of Ease Action Investments Corp. (resulting in 100% attributable interest in and control of Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Douro Holdings Inc.

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls 100% of Ferretti Holdings Corp. (resulting in 100% attributable interest in and control of Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

CITIC Pacific Communications Limited

Address: 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: Bermuda
Shareholding in Applicant: Directly owns and controls 100% of Douro Holdings Inc. (resulting in 100% attributable interest in and control of Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Effectual Holdings Corp.

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls 100% of CITIC Pacific Communications Limited (resulting in 100% attributable interest in and control of Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Crown Base International Limited

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central

Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls 100% of Effectual Holdings Corp.
(resulting in 100% attributable interest in and control of Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

CITIC Pacific Limited

Address: 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Hong Kong-based conglomerate company, the major activities of which are carried out through six divisions: Special Steel and Iron Ore Mining, Property, Aviation, Power and Civil Infrastructure, Communications and Marketing and Distribution
Place of Incorporation: Hong Kong
Shareholding in Applicant: Directly owns and controls 100% of Crown Base International Limited (resulting in 100% attributable interest in and control of Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Rockhampton Investments Limited

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns approximately 13% of CITIC Pacific Limited (resulting in 13% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Bloomfield Enterprises Corp.

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns and controls 100% of Rockhampton Investments Limited (resulting in approximately 13% attributable interest in Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Earnplex Corporation

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Phone: c/o +(852) 28202218
Principle Business: Investment holding company
Place of Incorporation: Republic of Liberia
Nature of Involvement: Indirectly owns less than 1% of CITIC Pacific Limited and directly owns and controls 100% of Bloomfield Enterprises Corp. (resulting in approximately 13% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Larry Yung Chi Kin

Business Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Executive Management
Citizenship: Hong Kong
Shareholding in Applicant: Indirectly owns approximately 5% of CITIC Pacific Limited and directly owns and controls 100% of Earnplex Corporation (resulting in approximately 18% attributable interest in Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Honpville Corporation

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns approximately 14% of CITIC Pacific Limited (resulting in 14% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Heedon Corporation

Address: c/o 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: Republic of Liberia

Shareholding in Applicant: Indirectly (through 100% ownership of Honpville Corporation and others) owns and controls approximately 23% of CITIC Pacific Limited (resulting in approximately 23% attributable interest in Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

CITIC Hong Kong (Holdings) Limited

Address: 32/F, CITIC Tower
1 Tim Mei Avenue, Central
Hong Kong
Principle Business: Investment holding company
Place of Incorporation: Hong Kong
Shareholding in Applicant: Indirectly owns and controls approximately 6% of CITIC Pacific Limited and directly owns and controls 100% of Heedon Corporation (resulting in approximately 29% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

CITIC Group

Address: Capital Mansion
6 Xinyuan South Road
Chaoyang District, Beijing 100004
Principle Business: Investment holding company
Place of Incorporation: People's Republic of China
Shareholding in Applicant: Directly owns and controls 100% of CITIC Hong Kong (Holdings) Limited (resulting in approximately 29% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Assets Supervision and Administration Commission of the State Council of China

Address: Government of China
Beijing, China
Place of Incorporation: China
Principal Business: Government
Shareholding in Applicant: Directly owns 100% of CITIC Group (resulting in approximately 29% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). *See* 47 C.F.R. § 63.18(h).

Response to Question 15

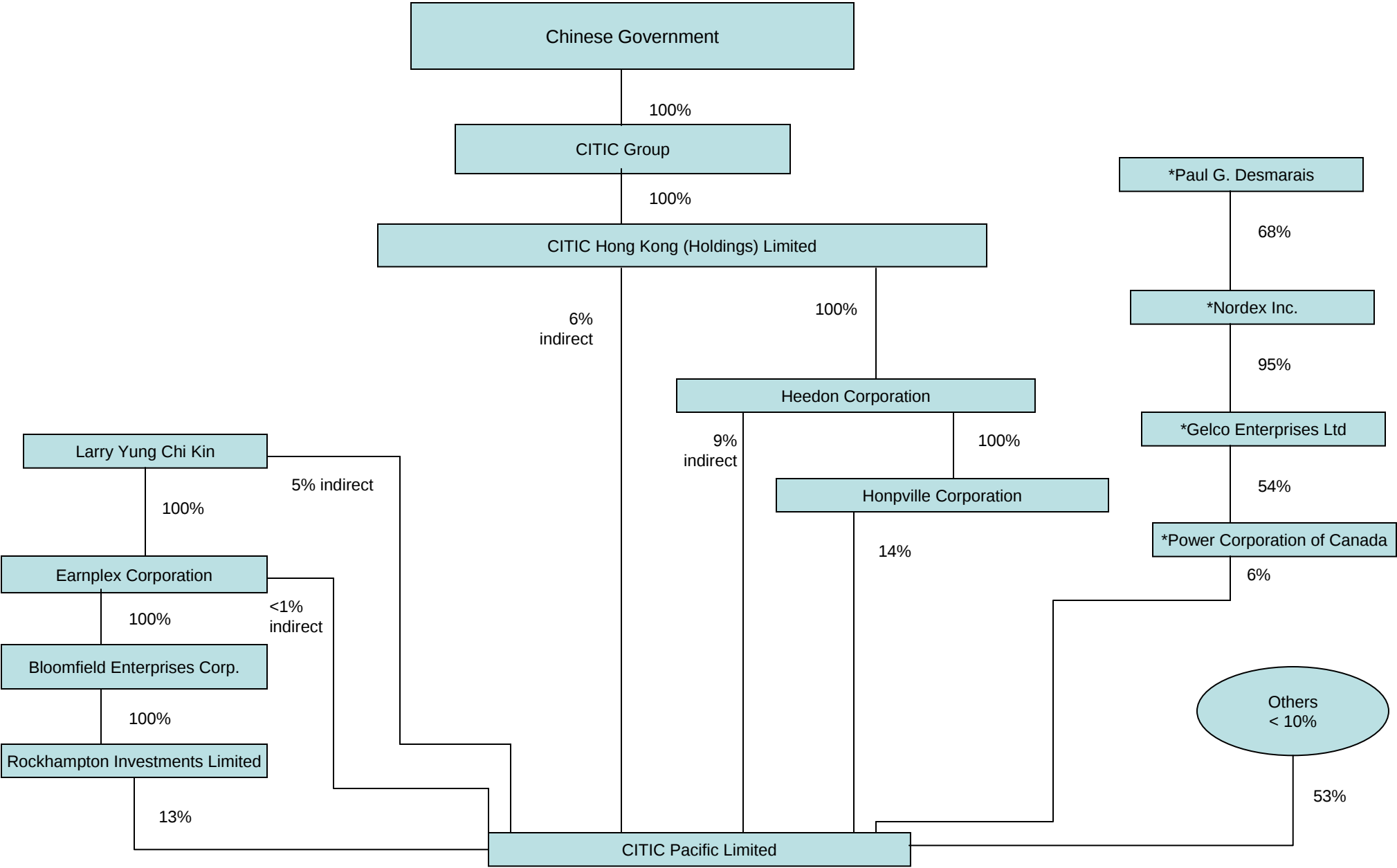
Section 63.18(d): The Applicant has not previously received Section 214 authority.

Section 63.18(e)(3): The Applicant is requesting authority pursuant to Section
63.18(e)(2) of the Commission's rules. *See* 47 C.F.R. §
63.18(e)(2).

Section 63.18(g): Not applicable.

Pacific Networks Corp.
Ownership Structure

(*Not required to be disclosed by the FCC’s rules, but requested by DHS)



Pacific Networks Corp.
Ownership Structure

Pacific Networks Corp.
Application for International Section 214 Authority
Exhibit A

