



Federal Communications Commission  
Washington, D.C. 20554

International Bureau

E-mail: [James.Ball@fcc.gov](mailto:James.Ball@fcc.gov)

[George.Li@fcc.gov](mailto:George.Li@fcc.gov)

(202) 418-1462

(202) 418-2824 (fax)

July 17, 2008

Ref: 2008-33

Hillary Morgan (703) 607-6092  
Stephen Heifetz (202) 282-8973  
Josephine Arnold (202) 482-5461  
Kenneth Schagrin (202) 395-5663  
John Connors (202) 305-4218

Steven W. Lett (202) 647-5835  
Alex Darnan (202) 282-9940  
Edward T. Hand (202) 514-2464  
Sally S. Wentworth (202) 456-6085  
Douglas A. Klein (202) 324-0853

Re: Mod of Subcable, Section 214 and 310(b)(4) applications

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. August 6, 2008**, 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](http://www.fcc.gov/ibfs) and searching by the file number.**

**ITC-214-20080715-00320 (e-file)**  
Global-Tech Comm, Inc.'s application for authority to provide resale services between the United States and permissible international points. A citizen of **Dominican Republic** and a citizen of **Cuba**, each of whom owns 50% of the applicant.

**ITC-214-20080715-00321 (e-file)**  
Easy Phone Communications, Corp.'s application for authority to provide resale services between the United States and permissible international points. Applicant is 100% owned by a citizen of **Cuba**.

**ITC-214-20080709-00322 (e-file)**  
psyouphone's application for authority to provide resale services between the United States and permissible international points. Applicant is 100% owned by a citizen of **Brazil**.

**SCL-MOD-20080714-00012**  
An application to modify the authorization to construct, land and operate the Trans-Pacific Express Cable Network (TPE), SCL-LIC-20070222-00002. The TPE Consortium seeks FCC approval to add NTT Communications Corporation (NTT Com), a Japanese Corporation, as an additional licensee of the TPE cable and to extend the cable to add a landing station in Shimmariyama, Japan. NTT Com will join the TPE Consortium and acquire a-13.11% interest in the international waters segments of the TPE cable. With the addition of NTT Com, all parties except for AT&T Corp. (ATTC) will hold a 13.11% interest in the international waters segments, and ATTC will hold a 8.20% interest in the international waters segment of the cable. The addition of NTT Com as a licensee/owner will not affect ownership in any of the existing landing stations. NTT Com is a direct, wholly-owned subsidiary of Nippon Telegraph and Telephone Corporation ("NTT"). As of September 30, 2007, the **Japanese Minister of Finance** held 33.72% of issued shares in NTT. NTT Com agrees to accept and abide by the reporting

requirements contained in Section 1.767(l) of the Commission's rules, 47 C.F.R. § 1.767(l), for the **U.S.-Japan** route.

**ISP-PDR-20080630-00014 (e-file)**

Cello Partnership d/b/a Verizon Wireless ("Verizon Wireless") requests the Commission to extend its current Section 310(b)(4) authority to hold interests in common carrier licenses and authorizations to encompass the licenses that are proposed to be assigned to Vista (Mirror 2) PCS License Holding, L.L.C. ("Mirror 2 Sub"), and to Mirror 2 Sub which, upon consummation of the proposed transactions, will be owned 100 percent by Verizon Wireless.

Verizon Wireless is a Delaware general partnership that is indirectly owned by Verizon Communications, Inc. ("Verizon") and Vodafone Group Plc ("Vodafone"). Verizon, a Delaware corporation, owns 55 percent of Verizon Wireless; Vodafone, a public limited company organized under the laws of the **United Kingdom**, owns 45 percent. Contemporaneously, Vista License Holdings, L.L.C. ("Vista License") is filing an application (the "Application") seeking Commission consent to assign, to Mirror 2 Sub, a wholly-owned subsidiary of Vista (Mirror 2) PCS, LLC ("Vista Mirror 2"), six common carrier broadband personal communications service ("PCS") licenses. The application also seeks Commission consent to the transfer of control over Mirror 2 Sub immediately following the proposed license assignments. Specifically, promptly after assignment of the licenses to Mirror 2 Sub, Verizon Wireless will acquire 100 percent ownership of Vista Mirror 2, and therefore 100 percent indirect ownership of Mirror 2 Sub. As a result, the proposed transaction contemplates Vodafone, a foreign corporation, acquiring a 45 percent indirect ownership interest in Mirror 2 Sub, and in the common carrier licenses Mirror 2 Sub proposes to acquire from Vista License, as a consequence of its indirect ownership interest in Verizon Wireless.

If we do not hear from you by **C.O.B. August 6, 2008**, we will assume that you do not have any concerns with the above listed applications.

**From:** Veronica Garcia-Ulloa  
**Sent:** Thursday, July 17, 2008 2:41 PM  
**To:** 'Douglas.Klein@ic.fbi.gov'; 'edward.hand@usdoj.gov'; 'hillary.Morgan@disa.mil'; 'jarnold@ntia.doc.gov'; 'kschagrin@ustr.gov'; 'vbarrish@askcalea.net'; 'maydc@state.gov'; 'lettsw@state.gov'; 'alane.kochems@associates.HQ.DHS.GOV'; 'Stephen.heifetz@dhs.gov'; 'Christopher.Stefken@ic.fbi.gov'; 'swentworth@ostp.eop.gov'; 'Erica.Bomsey@dhs.gov'; 'shannon.culbertson@associates.dhs.gov'; 'margaret.Dudek@dhs.gov'; 'Brandt.Pasco@dhs.gov'; 'CarrollD@state.gov'; 'Williams.Brian <CTR>'; 'Pinto, Greg (DHS)'; 'Daman, Alex'; 'Daniels, Douglas'; 'Connors, John'; 'TTelecom'; 'Thomas Doyle'; 'Ongman, Joanne'; 'Rockoff, Jennifer'; 'Siobhan.Dupuy@usdoj.gov'; 'mary.wheaton2@usdoj.gov'  
**Cc:** James Ball; Francis Gutierrez; Howard Griboff; George Li; Susan OConnell; David Krech; JoAnn Sutton; Mikelle Morra; Veronica Garcia-Ulloa; Janeese Parker; Imani Ellis  
**Subject:** Cover Letter Reference 2008-33 (Comments due: July August 6, 2008).

**Attachments:** Executive Branch 2008-33.doc

Good Afternoon,

Attached is Cover Letter Reference 2008-33 (**Comments due: August 6, 2008**).

Thank you,

Veronica Garcia-Ulloa  
[Veronica\\_Garcia-Ulloa@fcc.gov](mailto:Veronica_Garcia-Ulloa@fcc.gov)  
Federal Communications Commission