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April 22, 2015

***Via IBFS***

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554  
Attn: International Bureau

**Re: IB File No. ITC-214-20120629-00171**  
**Application of CITIC Telecom International CPC (USA) LLC for Grant of**  
**Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended**  
**SUPPLEMENT**

Dear Ms. Dortch:

CITIC Telecom International CPC (USA) LLC ("Applicant"), by undersigned counsel, hereby supplements the above-referenced Application to update and correct certain information included in the initial filing submitted in June 2012.

**1. Interlocking Directorates**

Pursuant to Section 63.18(h) of the Commission's Rules, 47 C.F.R. § 63.18(h), and in response to question 14, the initial filing stated that Applicant had no interlocking officers or directors with foreign carriers to report. Effective February 13, 2015, Mr. Yip Kwok Hing replaced Mr. Yuen Kee Tong, Norman, as a Manager of the Board of the Applicant. Mr. Yip will also be a director of ComNet (Taiwan) Limited and E-Tone Network Corporation, affiliates of Applicant. Mr. Yip will also be a director of 泰富國際網絡股份有限公司 (*i.e.*, Tai Fu International Network Company Limited), which is a Taiwan telecommunications provider. In addition, Mr. Yip is nominated as a member of the Fiscal Committee (Supervisory Board) of Companhia de Telecomunicacoes de Macau, S.A.R.L., which is a Macau telecommunications provider and affiliate of Applicant.

Almaty Astana Beijing Boston Brussels Chicago Dallas Dubai Frankfurt Harrisburg Hartford Houston London Los Angeles Miami Moscow  
New York Orange County Paris Philadelphia Pittsburgh Princeton San Francisco Santa Monica Silicon Valley Tokyo Washington Wilmington

## **2. Foreign Affiliates**

Applicant also hereby supplements Questions 11 & 12 of the application in the above-referenced docket to provide the following information concerning the Applicant's foreign carrier affiliates. Specifically, pursuant to Section 63.09(d) of the Commission's rules, the Applicant certifies that it is not a foreign carrier within the meaning of Section 63.09(d) of the Commission's Rules. As set forth in the initial application, the Applicant is affiliated with CITIC Telecom International Limited, a Hong Kong telecommunications provider. CITIC Telecom International Limited, the foreign affiliate, is wholly owned by CITIC Telecom International Holdings Limited. The Applicant is indirectly wholly owned by CITIC Telecom International Holdings Limited. CITIC Telecom International Holdings Limited also indirectly owns CITIC Telecom International CPC Limited, the foreign affiliate. In addition, the Applicant is affiliated with carriers owned or controlled by the Chinese Government, which holds an indirect controlling interest in the Applicant. This includes China Telecommunications Corporation ("China Telecom").

Applicant has conducted an exhaustive review of its foreign carrier affiliates within the CITIC Group Corporation group of companies and hereby reports a number of additional carriers, which are set forth in Attachment 1 of this letter. The relevant countries where such affiliates operate are all WTO-member countries..

With respect to Canada, Japan, Malaysia, Singapore, Taiwan and the United Kingdom, Applicant's affiliates are competitive telecommunications providers in highly competitive markets. Each of these foreign affiliates lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route. As such, these affiliates classify for non-dominant carrier treatment under 47 CFR § 63.10(a)(3).

Applicant agrees to be classified as dominant with respect to the US-China, US-Hong Kong, and US-Macau routes, without prejudice to its right to petition for reclassification at a later date. Moreover, the Applicant agrees to file quarterly traffic reports pursuant to Section 43.61(c) of the Commission's Rules with respect to these routes.

## **3. Ownership Information**

Finally, the Applicant hereby supplements Question 14 of the application in the above-referenced docket to provide updated intermediary ownership information (Applicant's ultimate ownership remains unchanged at this time). The following entities directly or indirectly own 10 percent or more of the Applicant (an updated ownership chart is provided as Attachment 2 to this letter):

### **Dynasty Power Investments Limited**

Address: c/o 20/F, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong  
Principal Business: Investment holding company

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Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns and controls 100% of Applicant.

**CITIC Telecom International CPC Limited**

Address: 20/F, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong  
Principal Business: Provision of telecommunications services  
Place of Incorporation: Hong Kong  
Shareholding in Applicant: Directly owns and controls 100% of Dynasty Power Investments Limited. (resulting in 100% indirect ownership and control of Applicant).

**Silver Linkage Investments Inc.**

Address: c/o 20/F, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns and controls 100% of CITIC Telecom International CPC Limited (resulting in 100% indirect ownership and control of Applicant).

**CITIC Telecom International Holdings Limited**

Address: 25/F., CITIC Telecom Tower  
93 Kwai Fuk Road  
Kwai Chung, New Territories  
Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: Hong Kong  
Shareholding in Applicant: Directly owns and controls 100% of Silver Linkage Investments Inc. (resulting in 100% indirect ownership and control of Applicant).

**Silver Log Holdings Ltd.**

Address: c/o Room 2118, Hutchison House  
10 Harcourt Road, Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns approximately 18.21% of CITIC Telecom International Holdings Limited (resulting in approximately 18.21% indirect ownership of the Applicant).

**CITIC Investment (HK) Limited**

Address: Room 2118 Hutchison House

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10 Harcourt Road  
Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: Hong Kong  
Shareholding in Applicant: Directly owns and controls 100% of Silver Log Holdings Ltd. (resulting in approximately 18.21% indirect ownership of the Applicant).

**CITIC Corporation Limited (formerly known as CITIC Limited)**

Address: 6 Xinyuan Nanlu  
Chaoyang District, Beijing 100004  
Principal Business: Investment holding company  
Place of Incorporation: People's Republic of China  
Shareholding in Applicant: Directly owns 100% of CITIC Investment (HK) Limited (resulting in approximately 18.21% indirect ownership of the Applicant).

**Ease Action Investments Corp.**

Address: c/o 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns approximately 37.00% of CITIC Telecom International Holdings Limited (resulting in approximately 37.00% indirect ownership of the Applicant).

**Ferretti Holdings Corp.**

Address: c/o 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principal 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 approximately 37.00% indirect ownership of the Applicant).

**Richtone Enterprises Inc.**

Address: c/o 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands

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Shareholding in Applicant: Directly owns approximately 4.02% of CITIC Telecom International Holdings Limited (resulting in approximately 4.02% indirect ownership of the Applicant).

**Peganin Corp.**

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

Principal Business: Investment holding company

Place of Incorporation: British Virgin Islands

Shareholding in Applicant: Directly owns and controls 100% of Richtone Enterprises Inc. (resulting in approximately 4.02% indirect ownership of the Applicant).

**Douro Holdings Inc.**

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

Principal Business: Investment holding company

Place of Incorporation: British Virgin Islands

Shareholding in Applicant: Directly owns and controls 100% of each of Ferretti Holdings Corp. and Peganin Corp., and thus indirectly owns approximately 41.02% of CITIC Telecom International Holdings Limited (resulting in approximately 41.02% indirect ownership of the Applicant).

**CITIC Pacific Communications Limited**

Address: 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong

Principal Business: Investment holding company

Place of Incorporation: Bermuda

Shareholding in Applicant: Directly owns and controls 100% of Douro Holdings Inc. (resulting in approximately 41.02% indirect ownership of the Applicant).

**Effectual Holdings Corp.**

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

Principal Business: Investment holding company

Place of Incorporation: British Virgin Islands

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Shareholding in Applicant: Directly owns and controls 100% of CITIC Pacific Communications Limited (resulting in approximately 41.02% indirect ownership of the Applicant).

**Crown Base International Limited**

Address: c/o 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns and controls 100% of Effectual Holdings Corp. (resulting in approximately 41.02% indirect ownership of the Applicant).

**CITIC Pacific Limited (formerly known as Golden Crest Company Ltd.)**

Address: 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns and controls 100% of Crown Base International Limited (resulting in approximately 41.02% indirect ownership of the Applicant).

**CITIC Limited (formerly known as CITIC Pacific Limited)**

Address: 32/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principal Business: CITIC Limited is China's largest conglomerate. Its businesses include financial services, resources and energy, manufacturing, real estate and infrastructure, engineering contracting, and other businesses in China and overseas.  
Place of Incorporation: Hong Kong  
Shareholding in Applicant: Directly owns and controls 100% of each of CITIC Pacific Limited and CITIC Corporation Limited (resulting in 100% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

**CITIC Polaris Limited**

Address: c/o 6 Xinyuan Nanlu  
Chaoyang District, Beijing 100004  
Principal Business: Investment holding company

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Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns approximately 48.00% of CITIC Limited (resulting in approximately 48.00% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

**CITIC Glory Limited**

Address: c/o 6 Xinyuan Nanlu  
Chaoyang District, Beijing 100004  
Principal Business: Investment holding company  
Place of Incorporation: British Virgin Islands  
Shareholding in Applicant: Directly owns approximately 29.9% of CITIC Limited (resulting in approximately 29.9% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

**CITIC Group Corporation**

Address: 6 Xinyuan Nanlu  
Chaoyang District, Beijing 100004  
Principal Business: Investment holding company  
Place of Incorporation: People's Republic of China  
Shareholding in Applicant: Directly owns 100% of each of CITIC Polaris Limited and CITIC Glory Limited, and thus indirectly owns approximately 77.9% of CITIC Limited (resulting in 100% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

**Ministry of Finance of the People's Republic of China of the State Council**

Address: Government of China  
Beijing, China  
Place of Incorporation: People's Republic of China  
Principal Business: Government  
Shareholding in Applicant: Owns 100% of CITIC Group Corporation (resulting in 100% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

Please contact the undersigned if you have any questions regarding this matter.

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Respectfully submitted,

*/s/ Ulises R. Pin*

Ulises R. Pin  
Jeffrey R. Strenkowski

Counsel to CITIC Telecom International CPC (USA) LLC

Attachment

cc: Team Telecom (Tyrone Brown)



### **Attachment 1**

Applicant's foreign carrier affiliates (under the CITIC Group Corporation group of companies) are:

<b>Carrier<sup>1</sup></b>	<b>Country</b>
ComNet Telecom (Canada) Ltd.	Canada
CITIC Networks Co. Ltd.	China
Guangdong Eastern Fibernet Investment Co. Ltd.	China
Guangzhou Eastern Broadband Co. Ltd.	China
Hunan CITIC Communication Co. Ltd.	China
CPCNet Limited	China
China Enterprise ICT Solutions Limited	China
CITIC Telecom International Limited	Hong Kong
CITIC Telecom International (Data) Limited	Hong Kong
Asia Pacific Internet Exchange Limited	Hong Kong
ComNet Telecom (HK) Limited	Hong Kong
ComNet Telecom International Limited	Hong Kong
CITIC Telecom International CPC Limited	Hong Kong
Global Link Information Services Limited	Hong Kong
Vision Network Limited	Hong Kong
China Enterprise Netcom Corporation Limited	Hong Kong
Nebular Telecom Japan K.K.	Japan
CITIC Telecom International (Japan) Ltd.	Japan
CITIC Telecom International CPC Japan Limited	Japan
Companhia de Telecomunicacoes de Macau, S.A.R.L.	Macau
CTM (HK) Limited	Macau
Telshine Telecommunication Sdn. Bhd.	Malaysia
CITIC Telecom International CPC (Malaysia) Sdn. Bhd.	Malaysia
ComNet Distribution (S) Pte. Ltd.	Singapore
ComNet Telecom (Singapore) Pte. Ltd.	Singapore
CITIC Telecom International (SEA) Pte. Ltd.	Singapore
CTM (Singapore) Pte. Ltd.	Singapore
CITIC Telecom International CPC (Singapore) Pte. Ltd.	Singapore
E-Tone Network Corporation	Taiwan
ComNet (Taiwan) Limited	Taiwan
CITIC Telecom (UK) Limited	United Kingdom

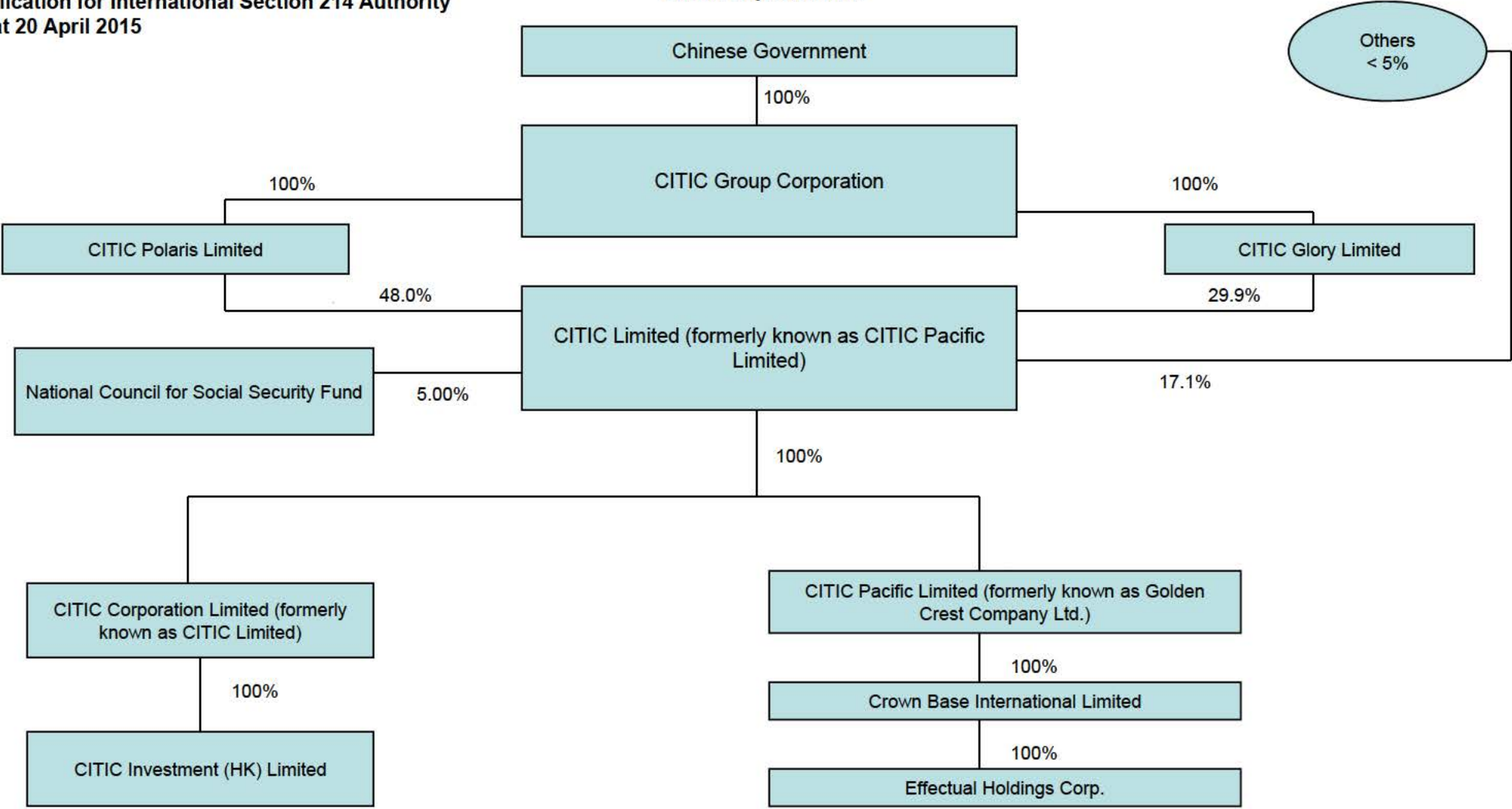
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<sup>1</sup> Note that some company names are English translations from the language under which the relevant company is organized.

**Attachment 2**

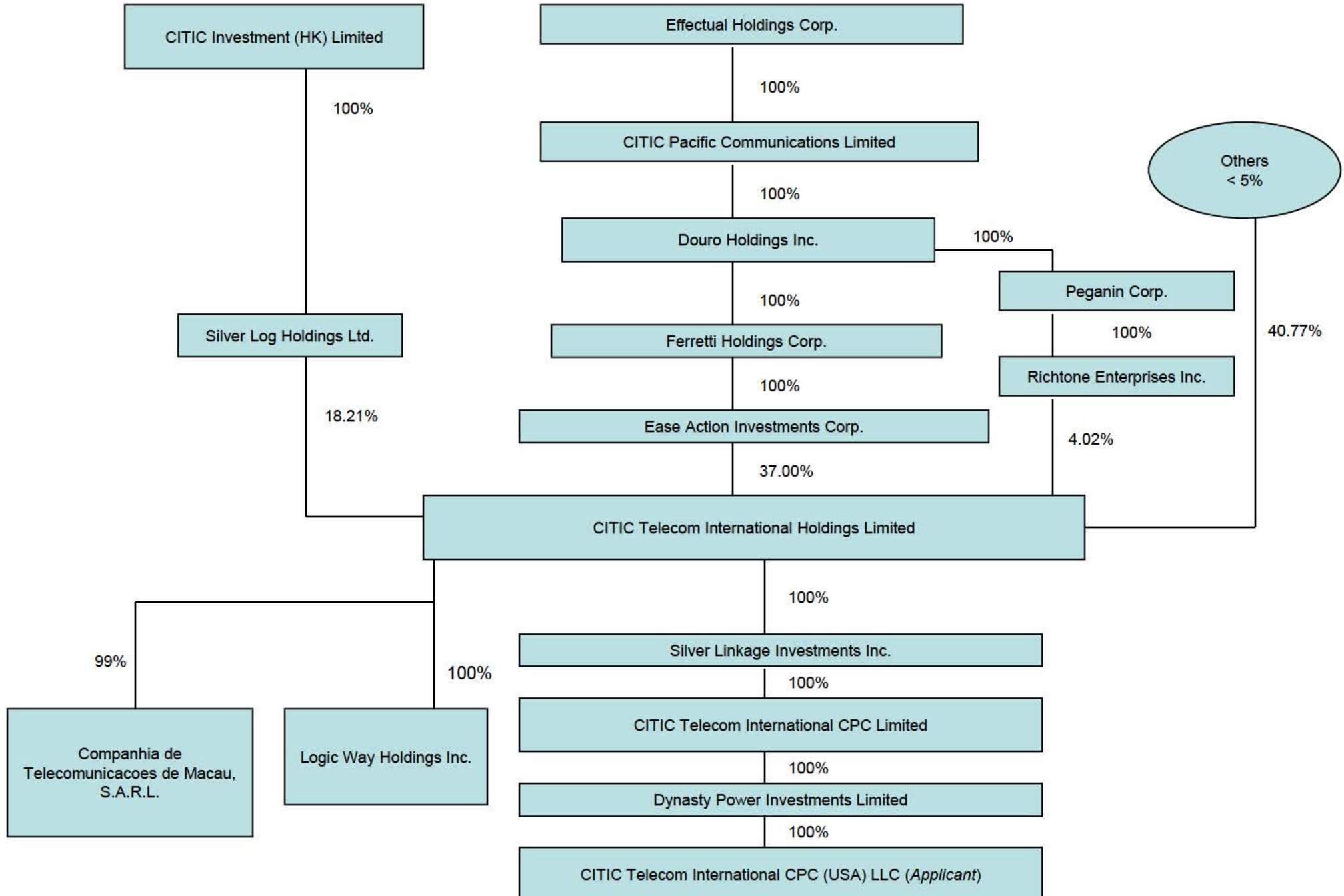
**Organizational Charts**

CITIC Telecom International CPC (USA) LLC  
Ownership Structure

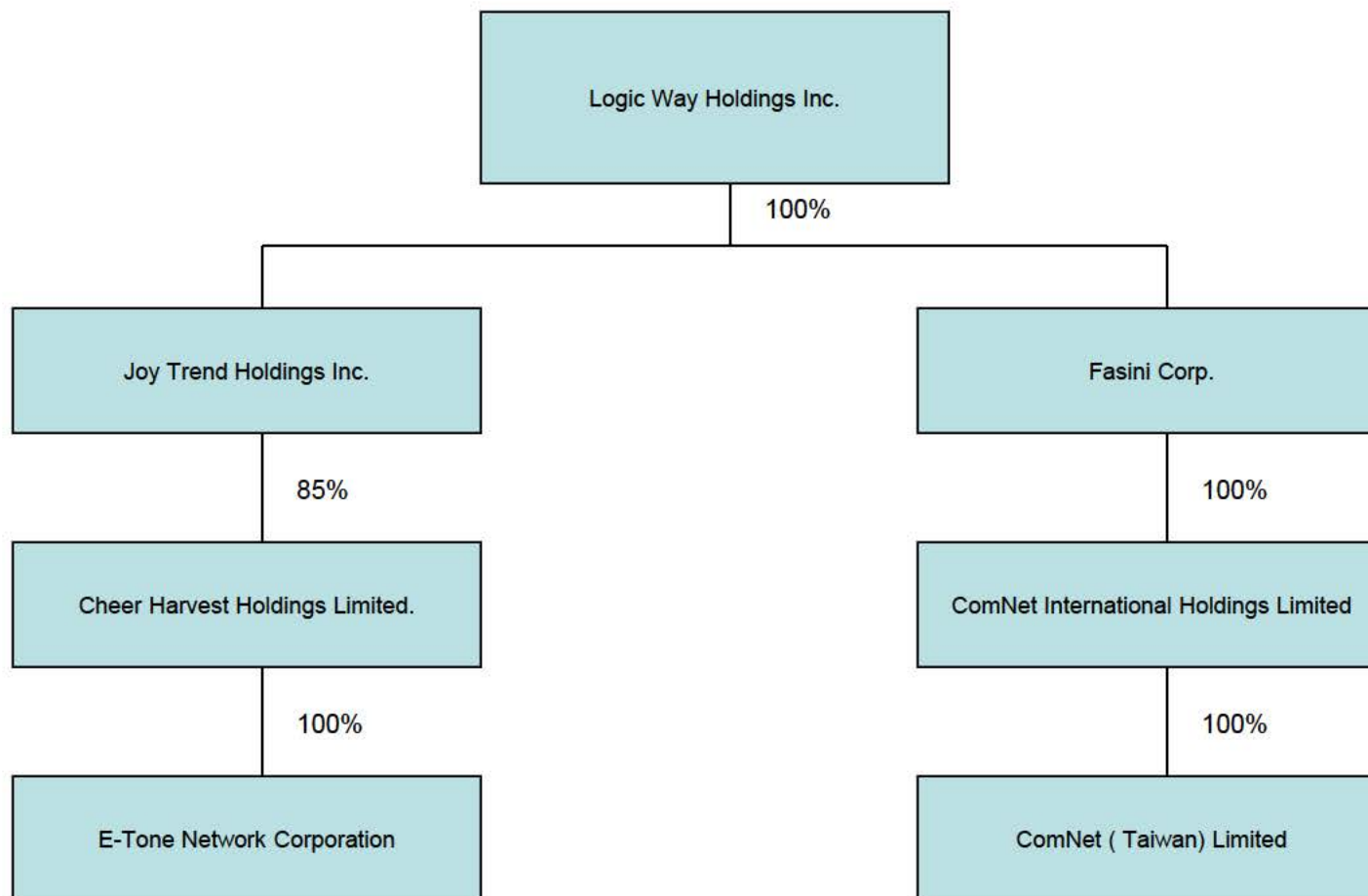


**CITIC Telecom International CPC (USA) LLC  
Ownership Structure**

CITIC Telecom International CPC (USA) LLC  
Application for International Section 214 Authority



**CITIC Telecom International CPC (USA) LLC  
Ownership Structure**

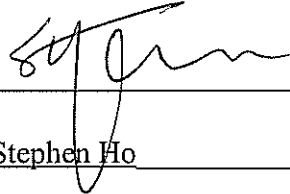


**Verification**

On behalf of CITIC Telecom International CPC (USA) LLC, I hereby certify that the statements in the foregoing Supplement are true, complete, and correct to the best of my knowledge and are made in good faith.

CITIC Telecom International CPC (USA) LLC

By:



Name:

Stephen Ho

Title:

Manager

Date:

22 April 2015