

Attachment 2

Application of CITIC Telecom International CPC (USA) LLC

Question 14

The following information is provided pursuant to Section 63.18(h) of the Commission's Rules, 47 C.F.R. § 63.18(h):

The following entities directly or indirectly own 10 percent or more of the Applicant (an ownership chart is provided as Exhibit A):

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

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: 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 Silver Linkage Investments Inc. (resulting in 100% indirect ownership and control of Applicant).

Silver Log Holdings Ltd.

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 17.01% of CITIC Telecom International Holdings Limited (resulting in approximately 17.01% indirect ownership of the Applicant).

Onway Assets Holdings Ltd.

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 Silver Log Holdings Ltd. (resulting in approximately 17.01% 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 39.47% of CITIC Telecom International Holdings Limited (resulting in approximately 39.47% 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 39.47% indirect ownership of the Applicant).

Richtone Enterprises Inc.

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

Principal Business: Hong Kong
Investment holding company
Place of Incorporation: British Virgin Islands
Shareholding in Applicant: Directly owns approximately 4.11% of CITIC Telecom International Holdings Limited (resulting in approximately 4.11% 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 4.11% 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 Onway Assets Holdings Ltd., Ferretti Holdings Corp. and Peganin Corp., and thus indirectly owns approximately 60.59% of CITIC Telecom International 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).

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 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
Principal 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
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 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
Principal Business: CITIC Pacific Limited's operational focus is on China, both the mainland and Hong Kong. Its major businesses are in special steel manufacturing, iron ore mining and property development in mainland China. Other businesses include energy and civil infrastructure. It also holds controlling interests in Dah Chong Hong Holdings Limited and CITIC Telecom International Holdings Limited.
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).

Full Chance Investments 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 12.342% of CITIC Pacific Limited (resulting in approximately 12.342% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

Newease Investments 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 12.342% of CITIC Pacific Limited (resulting in approximately 12.342% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

Skyprofit Holdings 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 12.342% of CITIC Pacific Limited (resulting in approximately 12.342% attributable interest in the 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
Principal Business: Investment holding company
Place of Incorporation: Hong Kong
Shareholding in Applicant: Indirectly owns approximately 20.482% of CITIC Pacific Limited (resulting in approximately 20.482% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

CITIC Investment (HK) Limited

Address: Room 2118 Hutchison House
10 Harcourt Road
Hong Kong
Principal Business: Investment holding company
Place of Incorporation: Hong Kong
Shareholding in Applicant: Directly owns 100% of each of Full Chance Investments Limited, Newease Investments Limited and Skyprofit Holdings Limited, and thus indirectly owns approximately 37.026% of CITIC Pacific Limited (resulting in approximately 37.026% attributable interest in the Applicant pursuant to the note to Section 63.18(h)). See 47 C.F.R. § 63.18(h).

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 both CITIC Investment (HK) Limited and CITIC Hong Kong (Holdings) Limited, and thus indirectly owns approximately 57.508% of CITIC Pacific 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).

Beijing CITIC Enterprise Management Co., Ltd.

Address: c/o 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 0.1% of CITIC Limited, and thus indirectly owns approximately 5.7508% of CITIC Pacific Limited (resulting in approximately 5.7508% 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 Beijing CITIC Enterprise Management Co., Ltd, and directly owns 99.9% 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).

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: 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).

The Applicant has no interlocking officers or directors with foreign carriers to report.

Question 15

- (d) The Applicant has not previously received authority under Section 214 of the Act.

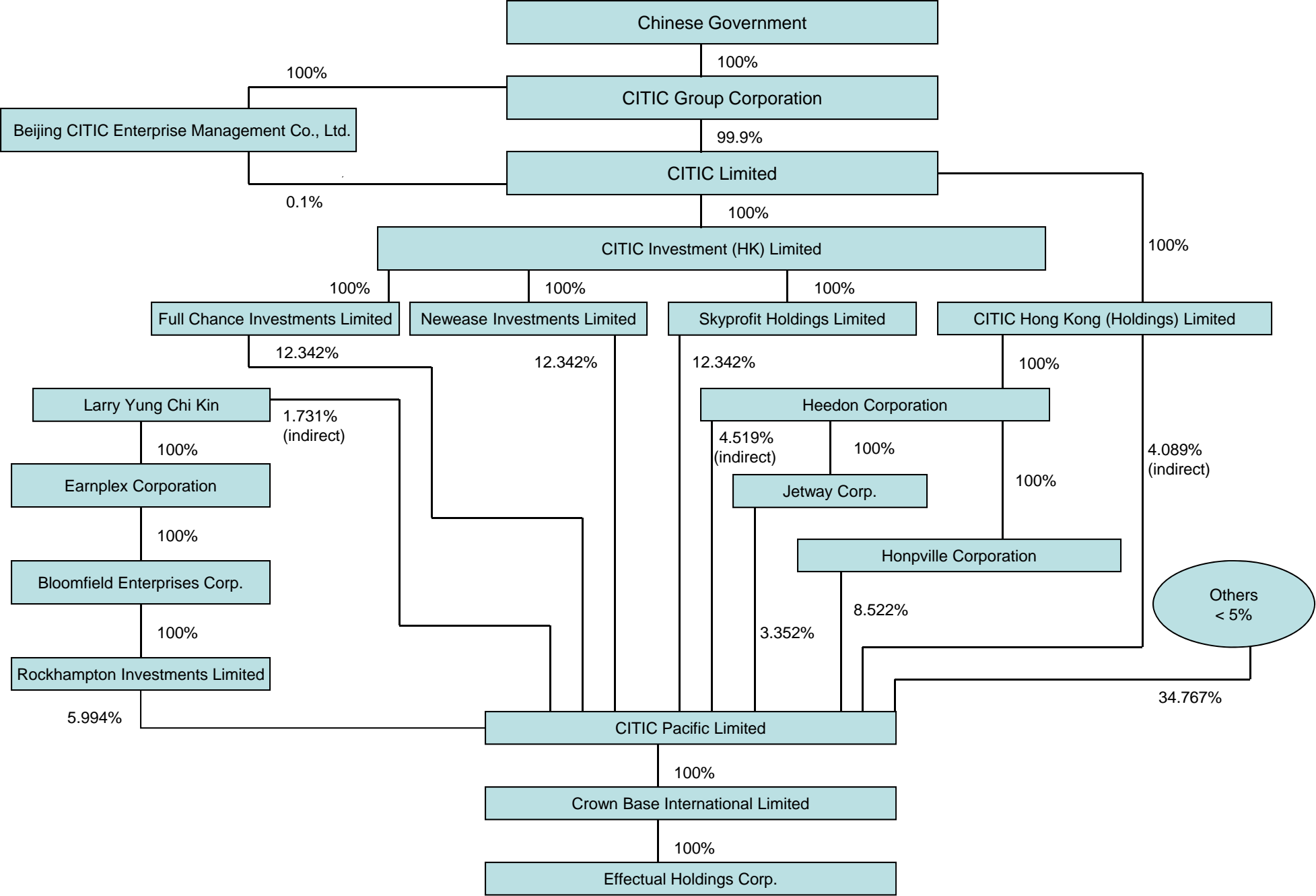
- (e)(3) The Applicant requests Section 214 authority to resell the international services of authorized U.S. common carriers pursuant to Section 63.18(e)(2) of the Commission's Rules. The Applicant requests such authorization for all international routes authorized by the Commission. CPC certifies that it will comply with the terms and conditions contained in Section 63.21 and 63.23 of the Commission's Rules.
- (g) Not applicable. The Applicant is not requesting facilities-based authority at this time.

Exhibit A

Applicant Ownership Chart

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

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

