

30 January 2015

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Re: Amendment to Application of China Mobile International (USA) Inc. for
International Section 214 Authority, FCC File No. ITC-214-20110901-00289*

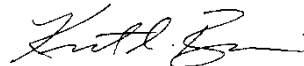
Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 63.21(a), China Mobile International (USA) Inc. (“CMIUSA”), through its counsel, files a minor amendment to its long-pending application for global facilities-based and global resale international Section 214 authority, originally filed on September 1, 2011. Specifically, CMIUSA amends its responses to Questions 11 and 14 of the Commission’s International Section 214 Authorization application form.

First, CMIUSA updates its foreign affiliate information and associated certifications. *Second*, CMIUSA amends its application to reflect the fact that CMIUSA’s immediate parent company, China Mobile International Limited (“CMI”) has transferred its entire interest in CMIUSA to another CMI subsidiary, China Mobile International (UK) Limited (“CMIUK”). CMIUK now holds a 100-percent direct interest in CMIUSA, as reflected in the Revised Attachment 2 and associated chart in the Revised Exhibit A. *Third*, CMIUSA discloses a new interlocking directorate.

Should you have any questions, please contact Kent Bressie by telephone at +1 202 730 1337 or by e-mail at kbressie@hwglaw.com.

Respectfully submitted,



Kent D. Bressie
Patricia J. Paoletta
Danielle J. Piñeres
Counsel for China Mobile International (USA) Inc.

REVISED ATTACHMENT 2

Application of China Mobile International (USA) Inc. for Authority to Provide International Facilities-Based and Resold Services to All International Points

Answer to Question 11:

China Mobile International (USA) Inc. (“CMIUSA”) provides the following supplementary information and certifications as required by 47 C.F.R. § 63.18(i) through (k) and (m):

- (i) By signature in the attached certification, CMIUSA certifies that in addition to the affiliations disclosed in its original application, it is affiliated with additional foreign carriers in Germany, Japan, and Singapore.
- (j) By the signature in the attached certification, CMIUSA certifies that it seeks to provide international telecommunications services to all international points (except those points on the Commission’s exclusion list), including the destination countries in which it is affiliated with the following foreign carriers (in addition to those listed in its original application):

| Destination Country | Foreign Affiliate |
|----------------------------|--|
| Germany | China Mobile International (Germany) GmbH |
| Japan | China Mobile International KK |
| Singapore | China Mobile International (Singapore) Pte. Ltd. |

- (k) By the signature in the attached certification, CMIUSA certifies that Germany, Japan, and Singapore is each a WTO member country.¹
- (m) Each of the foreign-carrier affiliates listed in response to 47 C.F.R. § 63.18(j) is a newly-established carrier starting with negligible market share in the respective international transport and local access markets of Germany, Japan, and Singapore. These affiliations therefore pose no risk to competition on the respective U.S.-international routes and qualify for presumptive non-dominant treatment pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.12(c)(ii). Moreover, none of these foreign-carrier affiliates appears on the Commission’s list of foreign carriers presumed to have market power in foreign destination markets.²

¹ See List of WTO Members and Observers (as of June 26, 2014), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

² See *International Bureau Revises and Reissues the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, 22 FCC Rcd. 945 (Int’l Bur. 2007).

Answer to Question 14:

By the signature in the attached certification, CMIUSA certifies that it has the following 10-percent-or-greater direct or indirect owners:

China Mobile International (UK) Limited (“CMIUK”)

Address: 90 Cannon Street, 6th Floor, London, United Kingdom EC4N 6HA

Citizenship: United Kingdom

Principal Business: telecommunications

Relationship: CMIUK directly owns 100 percent of CMIUSA.

China Mobile International Limited (“CMI”)

Address: Level 30, Tower 1, Kowloon Commerce Centre, No. 51 Kwai Cheong Road,
Kwai Chung, New Territories, Hong Kong

Citizenship: Hong Kong SAR

Principal Business: telecommunications

Relationship: CMI directly owns 100 percent of CMIUK.

China Mobile International Holdings Limited (“CMIHL”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Citizenship: Hong Kong SAR

Principal Business: investment holding company

Relationship: CMIHL directly owns 100 percent of CMI.

China Mobile Limited (“China Mobile”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Citizenship: Hong Kong SAR

Principal Business: telecommunications

Relationship: China Mobile directly owns 100 percent of CMIHL.

China Mobile Hong Kong (BVI) Limited (“CMHK-BVI”)

Address: P.O. Box 957, Offshore Incorporations Center, Road Town, Tortola, British
Virgin Islands

Citizenship: British Virgin Islands

Principal Business: investment holding company

Relationship: CMHK-BVI directly owns 73.31 percent of China Mobile (as of 30 June
2014).

China Mobile (Hong Kong) Group Limited (“CMHKG”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Citizenship: Hong Kong SAR

Principal Business: investment holding company

Relationship: CMHKG owns 100 percent of CMHK-BVI.

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China Mobile Communications Corporation (“CMCC”)

Address: 29 Jin Rong Avenue, Xicheng District, Beijing 100032, People’s Republic of China

Citizenship: People’s Republic of China

Principal Business: investment holding company

Relationship: CMCC owns 100 percent of CMHKG.

CMCC is a state-owned enterprise subject to the supervision of the State-Owned Assets Supervision and Administration Commission (“SASAC”) of the State Council of the People’s Republic of China. SASAC is a government entity located at No. 26, Xidajie, Xuanwumen, Xicheng District, Beijing 100053, People’s Republic of China. The PRC Government owns 100 percent of CMCC.

No other individual or entity holds a 10-percent-or-greater direct or indirect ownership interest in CMIUSA. This ownership information is shown graphically in Exhibit A.

CMIUSA has the following interlocking directorate: Dr. Yunjun Fan, a director of CMIUSA, is also Chairman and CEO of CMI.

**REVISED EXHIBIT A:
OWNERSHIP OF CHINA MOBILE INTERNATIONAL (USA) INC.**



CERTIFICATION

I, Xiangyang Luo, President of China Mobile International (USA) Inc., hereby certify to the following:

- (1) All of the information contained in the attached minor amendment to CMIUSA's application for international Section 214 authority is true and accurate to the best of my knowledge, and
- (2) No party to this notification is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

30 January 2015



Xiangyang Luo