

**ATTACHMENT 1  
FOR THE *PRO FORMA* ASSIGNMENT OF  
INTERNATIONAL SECTION 214 AUTHORIZATION**

This application notifies the Commission pursuant to Section 63.24(f) of the Commission's rules<sup>1</sup> of the *pro forma* assignment of an international Section 214 authorization from and to subsidiaries controlled by DOCOMO Guam Holdings, Inc. ("DOCOMO Holdings"). The assignment that is the subject of this notification filing resulted from an internal reorganization that occurred on January 27, 2016. In general, the DOCOMO-family of companies located on Guam and the Commonwealth of the Northern Marianas Islands (CNMI) simplified its corporate structure to eliminate intervening companies and LLCs. Overall, two Section 214 authorizations, and a minor interest in a submarine cable, were assigned to two different entities. Both before and after the assignment, there was no change in the ultimate control of the licenses or authorizations.<sup>2</sup> Attached is a chart showing the companies before and after the reorganization.

This application relates to the international Section 214 authorization held by Guam Telecom, LLC, which was assigned to DOCOMO PACIFIC, INC. The former was 100 percent controlled by DOCOMO Holdings; the latter is a 100 percent subsidiary of DOCOMO Holdings. As a result, the restructuring does not change the ultimate ownership or control of the international Section 214 authorization; DOCOMO Holdings (and through it, NTT DOCOMO, INC.) continue to control the authorization at issue. Accordingly, the assignment is *pro forma* in nature.

**RESPONSE TO ITEMS ON IBFS ELECTRONIC FORMAT**

**Answer to Question 10 – Section 63.18(c)-(d):**

Correspondence concerning this notification should be sent to:

James W. Hofman  
General Counsel  
DOCOMO PACIFIC, INC.  
219 S Marine Corps Dr. Ste. 206  
Tamuning, Guam 96913  
Tel: (671) 688-2355  
Fax: (671) 649-7247  
jhofman@docomopacific.com

with a copy to:

Carl R. Frank  
Wiley Rein LLP  
1776 K Street, NW

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<sup>1</sup> See 47 C.F.R. § 63.24(f).

<sup>2</sup> Separate notifications will be filed for assignment of those authorizations and license.

Washington, DC 20006  
Tel: (202) 719-7269  
Fax: (202) 719-7049  
cfrank@wileyrein.com

Place of Formation: Guam Telecom, LLC was a Delaware limited liability company. DOCOMO PACIFIC, INC. is a Guam corporation.

**Section 63.18(d).** Guam Telecom, LLC held the international Section 214 authorization that is the subject of this notification, File No. ITC-214-20050825-00349. DOCOMO PACIFIC, INC. holds an international Section 214 authorization, File No. ITC-214-20040517-00201, in connection with its provision of CMRS service.<sup>3</sup>

**Answer to Question 11 – Section 63.18(h):**

The name, address, citizenship, and principal business of each of DOCOMO PACIFIC, INC.'s ten percent or greater interest holders are:

***Direct Ownership of DOCOMO PACIFIC, INC.***

DOCOMO Guam Holdings, Inc.  
c/o NTT DOCOMO, INC.  
900 17th Street, NW  
Suite 620  
Washington, DC 20006  
Citizenship: Guam Corporation  
Principal Business: Holding Company  
Direct Ownership Interest: 100% interest in DOCOMO PACIFIC, INC.

***Indirect Ownership of DOCOMO PACIFIC, INC.***

NTT DOCOMO, INC. (“DOCOMO”)  
2-11-1 Nagata-cho, Chiyoda-ku  
Tokyo 100-6150, Japan  
Citizenship: Japan  
Principal Business: Mobile telecommunications and information services  
Percentage Held: 100% interest in DOCOMO Guam Holdings, Inc.

NIPPON TELEGRAPH AND TELEPHONE CORPORATION (“NTT”)  
3-1, Otemachi 2-Chome, Chiyoda-ku  
Tokyo 100-8116, Japan  
Citizenship: Japan

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<sup>3</sup> See *Applications of Guam Cellular and Paging, Inc. and DoCoMo Guam Holdings, Inc. and Applications of Guam Cellular and Paging, Inc. and Guam Wireless Telephone Company, LLC*, Memorandum Opinion and Order and Declaratory Ruling, 21 FCC Rcd 13580 (2006).

Principal Business: Ownership of shares and exercise of rights as shareholder of NTT group companies  
Percentage Held: 63.32% interest in DOCOMO

Japan Ministry of Finance  
3-1-1 Kasumigaseki, Chiyoda-ku  
Tokyo 100-8940, Japan  
Citizenship: Japan  
Principal Business: Japanese government  
Percentage Held: 33.78% interest in NTT

No other individual or entity has a ten percent or greater interest in NTT or DOCOMO PACIFIC, INC.

**Answer to Question 12 – Section 63.18(h):**

Keisuke Yoshizawa is a director for DOCOMO PACIFIC, INC. and DOCOMO Guam Holdings, Inc. He also is a director for the following three foreign carriers: Hutchison Telephone Company Limited, a carrier in Hong Kong; Far Eastone Telecommunications Co., Ltd., a carrier in Taiwan; and Robi Axiata Limited, a carrier in Bangladesh.

**Answer to Question 13**

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This application relates to the international Section 214 authorization held by Guam Telecom, LLC, which was assigned to DOCOMO PACIFIC, INC. The former was 100 percent controlled by DOCOMO Holdings; the latter is a 100 percent subsidiary of DOCOMO Holdings. As a result, the restructuring does not change the ultimate ownership or control of the international Section 214 authorization; DOCOMO Holdings (and through it, NTT DOCOMO, INC.) continue to control the authorization at issue. Accordingly, the assignment is *pro forma* in nature. The Commission previously recognized that “[r]egulatory review of [*pro forma*] transactions yields

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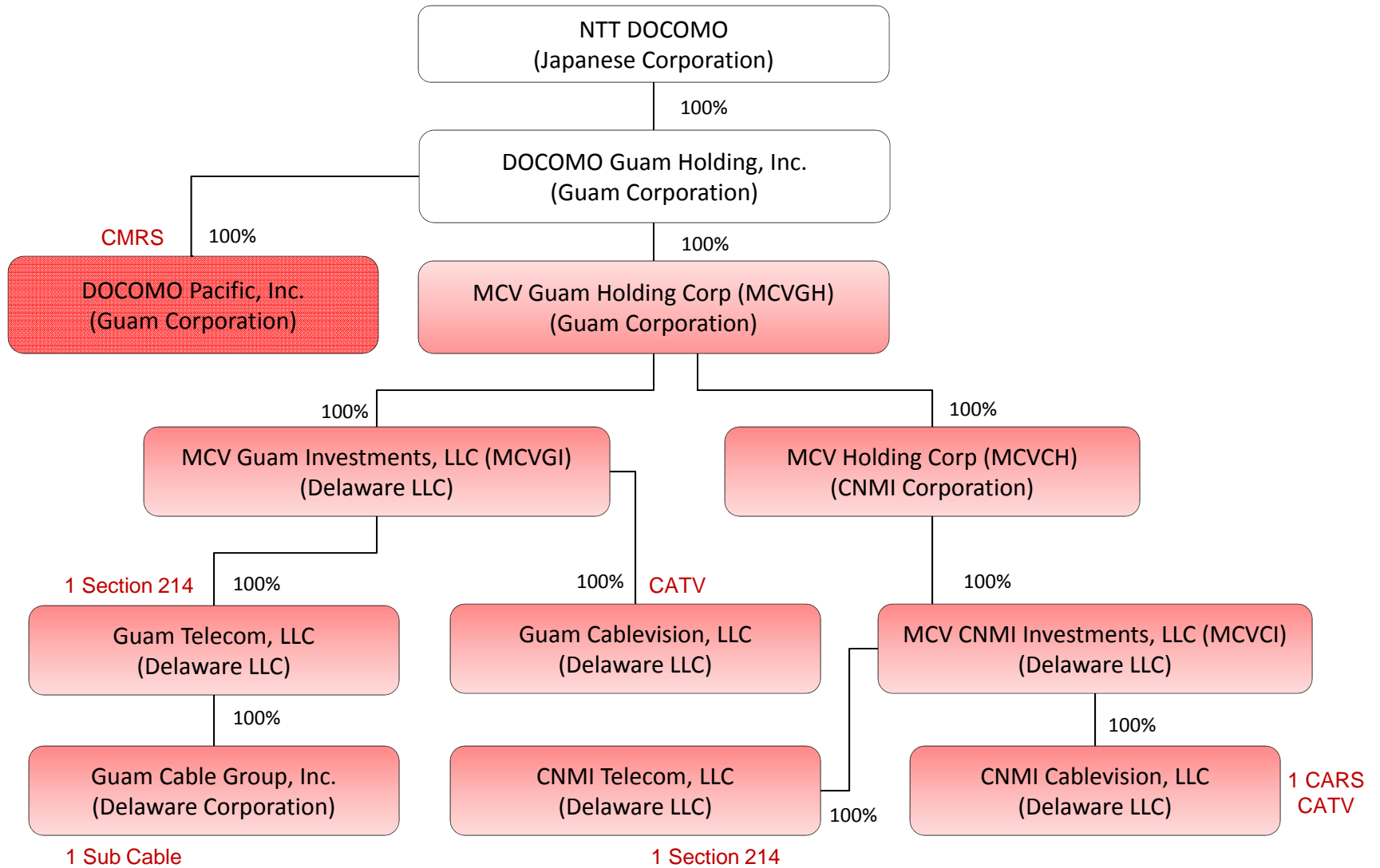
<sup>4</sup> See 47 C.F.R. § 63.24(f).

no significant public interest benefits, but may delay or hinder transactions that could provide substantial financial, operational, or administrative benefits for carriers.”<sup>5</sup>

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<sup>5</sup> *1998 Biennial Review – Review of International Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909, ¶ 42 (1999).

# PRE-REORGANIZATION CORPORATE STRUCTURE



# POST-REORGANIZATION CORPORATE STRUCTURE

