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FILED/ACCEPTED

JUL 18 2012

Federal Communications Commission
Office of the Secretary

July 18, 2012

BY HAND DELIVERY

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

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Re: StarHub, Inc. Request to Modify Regulatory Status on the U.S.-Ireland Route

Dear Ms. Dortch:

Pursuant to section 63.13 of the Commission's rules, 47 C.F.R. § 63.13, StarHub, Inc. ("StarHub") respectfully seeks to modify its regulatory status from dominant to non-dominant on the U.S.-Ireland route. StarHub previously notified the Commission of an affiliation with eircom Limited ("eircom"), which arose when StarHub's indirect shareholder, Singapore Technologies Telemedia Pte Ltd ("ST Telemedia") acquired control of eircom.¹ Because eircom was listed on the Commission's "List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets" and thus was presumed to be dominant in Ireland, StarHub agreed that, to the extent it provided service on the U.S.-Ireland route, it would comply with the dominant carrier safeguards contained in section 63.10 of the Commission's rules.²

StarHub's affiliation with eircom ceased effective June 11, 2012, following a restructuring of eircom's debt by which ST Telemedia's indirect interest in eircom was transferred to certain of eircom's lenders. ST Telemedia thus no longer owns or controls eircom. Although StarHub is now affiliated with other foreign carriers in Ireland, none of its affiliates

¹ See *Foreign Carrier Affiliation Notification*, Public Notice, Report No. FCN-00106, DA No. 10-1065, at 3 (rel. June 14, 2010) (File No. FCN-NEW-20100203-00001).

² *Id.*

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possess market power or is presumed to be dominant.³ As a result, the basis for treating StarHub as dominant on the U.S.-Ireland route has been eliminated. Accordingly, StarHub should now be presumptively considered non-dominant for the provision of international communications services on the U.S.-Ireland route, pursuant to section 63.10(a)(1) of the Commission's rules, 47 C.F.R. § 63.10(a)(1). To reflect that non-dominant classification, StarHub respectfully requests that the Commission modify StarHub's existing international section 214 authority (File Nos. ITC-214-20000731-00473 and ITC-214-20000731-00474) to relieve it of dominant status in connection with the U.S.-Ireland route and of any corresponding obligations—including the requirement that StarHub file quarterly traffic reports for that route as required by section 43.61(c) of the Commission's rules.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Brian W. Murray

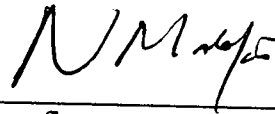
Attachment

cc (by electronic mail): David Krech

³ See File No. FCN-NEW-INTR2012-01524 (filed June 18, 2012). StarHub is dormant and thus does not currently provide service to any destination market.

CERTIFICATION

I, Neil Montefiore, Director of StarHub, Inc., hereby certify that the information in the attached letter is true and correct to the best of my knowledge.

A handwritten signature in black ink, appearing to read "NM" followed by a stylized flourish.

Neil Montefiore

Date: July 6, 2012