

Law Offices of Bennet & Bennet, PLLC

10 G Street, NE, Seventh Floor Washington, DC 20002 Tel: (202) 371-1500 Fax: (202) 371-1558 e-mail: mail@bennetlaw.com www.bennetlaw.com Caressa D. Bennet
Michael R. Bennet
Gregory W. Whiteaker
Marjorie G. Spivak
Donald L. Herman, Jr.
Howard S. Shapiro
Kenneth C. Johnson*
Rebecca L. Murphy
Joshua P. Zeldis

*Admitted in VA Only

Technidal Committing Services
Leonard M. Garavalia
James C. Egyud
Malick A. Sohrab
David A. Fritz
Judy Y. Deng

<u>Director of Government Affairs</u> Jessica H. Bridges

August 23, 2005

Via Hand Delivery

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

RECEIVED

AUG 2 3 2005

Federal Communications Commission
Office of Secretary

Re:

Transfer of Control of American Samoa License, Inc.

IB File No. ITC-T/C-20050603-00209 E

FRN: 0001843432

Dear Ms. Dortch:

Pursuant to a request for clarification received from the staff of the International Bureau, this letter will serve to confirm that James Ah Koy is a citizen of Fiji. Additionally, for both Sami Holdings and Kelton Investments the home market test factors are as follows:

a. Country of incorporation, organization, or charter--Fiji

b. Nationality of all investment principals, officers, and directors--Fiji

c. Country in which world headquarters is located--Fiji;

d. Country in which majority of tangible property, including production, transmission, billing, information, and control facilities, is located--Fiji

e. Country from which greatest sales/revenues from operations are, derived--Fiji

Please contact the undersigned with any questions.

Sincerely,

Howard S. Shapiro

cc (via email):

Susan O'Connell (7-B544) Francis Gutierrez (7-A623) Cara Grayer (7-A627) Joann Ekblad (7-A660) George Li (7-A669) Jodi Cooper (7-B428)