



Federal Communications Commission  
Washington, D. C. 20554

International Bureau

E-mail: [James.Ball@fcc.gov](mailto:James.Ball@fcc.gov)  
[George.Li@fcc.gov](mailto:George.Li@fcc.gov)

(202) 418-1462  
(202) 418-2824 (fax)  
October 11, 2006  
Ref: 2006-57

Hillary Morgan	(703) 607-6092	Steven W. Lett	(202) 647-5835
Regina Hart	(202) 205-0497	Louis Brenner	(202) 692-4235
Eric Werner	(202) 772-0908	Josephine Scarlett	(202) 482-5461
Edward T. Hand	(202) 514-2464	Kenneth Schagrin	(202) 395-5663
Helen Domenici	(202) 456-6085	Myra S. Trotter	(202) 324-1730
Sigal Mandelker	(202) 616-0573	Jonathan Frenkel	(202) 282-8478
Dominic Pastore	(202) 514-5607		
Stephen Heifetz	(202) 282-8973		

Re: Section 214 and 310(b)(4) applications

Dear Sir or Madam:

Please review the following applications and advise us whether you have any national security, law enforcement, foreign policy or trade concerns by **C.O.B. October 30, 2006**, because we are prepared to take action on these applications. **Electronic filed (e-file) applications are able to be viewed by accessing [www.fcc.gov/ibfs](http://www.fcc.gov/ibfs) and searching by the file number.**

**ISP-PDR-20060919-00012 (e-file)**

Trident Global Communications LLC (Trident) and PetroCom License Corporation (PetroCom) petition the Commission for a declaratory ruling under Section 310(b)(4) of the Communications Act of 1934, as amended, that it is in public interest to allow Kactus Investment Corporation (**Kactus**), a privately-held corporation organized under the laws of the **Cayman Islands** (a territory of the United Kingdom), to acquire a 40% indirect voting interest in PetroCom that would result from Trident's proposed acquisition of PetroCom's parent corporation (see transfer of control applications listed below). Petitioners **also** request authority to allow investors named in this petition or other unnamed investors to hold an additional, aggregate 25% foreign equity and voting interest in PetroCom, without seeking additional Commission approval.

Petitioners state that, although Kactus would be attributed with a 40% indirect voting interest in PetroCom under the Commission's foreign ownership precedent, the Kactus investment will be insulated and passive. Further, its indirect equity interest in PetroCom will be only 0.1019%. According to Petitioners, Kactus is an investment company that has its principal place of business in the United States. It is wholly owned by the Tamer Family Trust, which is based in the United States and is controlled by a U.S. citizen, Anthony Tamer. As the sole trustee, Mr. Tamer exercises legal title and control over the

ownership interest held in Kactus for the benefit of the trust's sole beneficiary, a citizen of Lebanon.

PetroCom holds a number of FCC licenses and authorizations: Cellular Radiotelephone and 800 MHz Specialized Mobile Radio (SMR), Domestic Fixed Satellite transmit/receive earth station and Very Small Aperture Terminal (VSAT) licenses; and an international Section 214 authorization.

**ITC-T/C-20060920-00436 (e-file)**

Application for consent to the transfer of control of international section 214 authorization, ITC-214-19980226-00151, held by PetroCom License Corporation (PetroCom) from S&P Cellular Holding Company LLC to Trident Global Communications LLC. PetroCom also requests consent for the transfer of control of wireless licenses (ULS 0002734993) and satellite earth station licenses (SES-T/C-20060920-01757 and SES-T/C-20060920-01758).

Kactus Investment Corporation, a private-held corporation organized under the laws of the Cayman Islands (a territory of the United Kingdom), will hold a 40% indirect voting interest in PetroCom, that would result from Trident's proposed acquisition of PetroCom's parent corporation. As noted above, a citizen of Lebanon will hold a 0.1019% indirect equity interest in PetroCom.

If we do not hear from you by **C.O.B. October 30, 2006**, we will assume that you do not have any concerns with these applications.

Sincerely,



George Li, Deputy Chief  
Policy Division