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APR - 4 2008

Federal Communications Commission
Office of the Secretary

ITC-7/c-20080310-
00137

April 3, 2008

BY HAND DELIVERY

RECEIVED

Marlene Dortch
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

APR 15 2008
Policy Division
International Bureau

Re: Commission questions regarding Pro Forma Notice of Change of Control
of s 214 authorisation holder Pacnet Cable (USA) Inc. (fka C2C Cable
(USA) Inc.) – ITC – 214-20010614-00347

Attention: International Bureau

Dear Ms. Dortch:

1. This letter is provided in response to your questions addressed to our attorney, Mr. Chip Yorkgits, by email dated 27 March 2008, regarding the notification of *pro forma* transfer of control given by Pacnet Cable (USA) Inc. pursuant to Section 63.24 of the Commission's rules (47 C.F.R. § 63.24) on 27 February 2008.
2. I understand that you requested a copy of a change of name filing in relation to Pacnet Cable (USA) Inc. (fka C2C Cable (USA) Inc.). A copy is attached.
3. Secondly, you enquire as to the place of incorporation of Ashmore Emerging Markets Debt Fund: it is a Cayman Islands company.
4. Finally, by way of clarification of paragraph (e) of the *pro forma* notice referred to above:

No other entity or individual holds 10 percent or greater direct or indirect equity or voting interest in Pacnet International Limited or in Pacnet Cable (USA) Inc. fka C2C Cable (USA) Inc. Each of the shareholders in Pacnet International Limited owns common shares only in Pacnet International Limited and has voting rights in proportion to its shareholding.

The ten shareholders in Pacnet Limited own a combination of common shares and preference shares in the following proportions:

Pacnet shareholders:	Limited	% Common	% Preference
Pacnet International Limited		92.61	92.61
Greylock Opportunities Master Fund Ltd	Global Opportunities Master Fund Ltd	0.77	0.77
Diversified Asian Strategies Fund		0.29	0.29
Stonehill Partners LP	Institutional Partners LP	0.70	0.70
Stonehill Offshore Partners Limited		0.78	0.78
Merrill Lynch, JPND, Inc.		2.07	2.07
Black River Asia Fund Ltd		0.46	0.46
PMA Asian Opportunities Fund		0.29	0.29
PMA Credit Opportunities Fund		0.59	0.59
Monarch Master Funding Ltd (Ika Quadrangle Master Funding Ltd)		1.44	1.44
Total		100%	100%

The preferred shares have no rights to vote at general meetings or proceedings of Pacnet Limited. In the event of an underwritten public offering of the company, each preferred share will automatically be converted into a common share.

Pacnet Limited owns 100% of the common shares and has 100% of the voting rights in Pacnet Cable Group Ltd.

Pacnet Cable Group Ltd owns 100% of the common shares and has 100% of the voting rights in Pacnet Cable Ltd.

Pacnet Cable Ltd owns 100% of the common shares and has 100% of the voting rights in Pacnet Cable (USA) Inc.



5. Enclosed please find a duplicate copy of this letter, and an extra copy marked "Stamp-In" to be date-stamped and returned to our US counsel in the envelope provided. Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned or our Washington, DC counsel, Edward A. Yorkgitis, Jr. of Kelley Drye & Warren LLP at (202) 342-8540.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. Simpson".

Dr. Andrew Simpson
Regional Legal Counsel, Director of Regulatory Affairs

Tel: +852 2121 2816 (direct)

Email: andrew.simpson@pacnet.com

Enclosures

cc: Sunita Mukhoty, IB
Mikelle Morra, IB



April 3, 2008

BY HAND DELIVERY

Marlene Dortch
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notification pursuant to Section 63.21 (i) of the Commission's Rules of Name
Change for **C2C Cable (USA) Inc. – ITC – 214-20010614-00347**

Attention: International Bureau

Dear Ms. Dortch:

C2C Cable (USA) Inc. ("C2C"), a Delaware corporation, hereby notifies the Commission that it has changed its name to Pacnet Cable (USA) Inc. ("Pacnet"). Pacnet holds the Section 214 license referenced above. For the Commission's information, this name change was referenced in the notification of a pro forma transfer of control filed with the Commission on February 27, 2008 as a result of a restructuring within the Pacnet group of companies.

Enclosed please find a duplicate copy of this letter, and an extra copy marked "Stamp-In" to be date-stamped and returned to our US counsel in the envelope provided. Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned or our Washington, DC counsel, Edward A. Yorkgitis, Jr. of Kelley Drye & Warren LLP at (202) 342-8540.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "A. Simpson".

Dr. Andrew Simpson
Regional Legal Counsel, Director of Regulatory Affairs
Tel. +852 2121 2816 (direct)
email: Andrew.Simpson@pacnet.com

Enclosures

cc: Sunnita Mukhoty, IB
Mikelle Morra, IB