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September 25, 2008

VIA HAND DELIVERY

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

Re: CM Tel (USA) LLC; International Section 214 Transfer of Control Application (ITC-T/C-20080913-00428)

Dear Ms. Dortch:

CM Tel (USA) LLC ("CM"), by its attorney, hereby provides the following supplement to its International Section 214 Transfer of Control Application (ITC-T/C-20080913-00428) filed September 13, 2008.

Thank you for your assistance. Please feel free to contact me with any questions.

Sincerely,

Joshua T. Guyan

Attachment

cc: Sumita Mukhoty, Policy Division, International Bureau, Federal Communications Commission (By Email)

Answer to Question 9

Pursuant to a Sale and Purchase Agreement dated August 28, 2008 (the "SPA"), CITIC 1616 Holdings Limited ("CITIC 1616") is acquiring China Motion NetCom and its U.S. subsidiary, CM Tel (USA) LLC, from ChinaMotion NetCom Holdings Limited, a subsidiary of China Motion Telecom International Limited. CITIC 1616 will acquire CM Tel (USA) LLC through CITIC 1616's indirectly wholly owned subsidiary, Pacific Networks Corp. ("Pacific Networks"). Pursuant to the SPA, majority ownership and control of CM Tel (USA) LLC will remain ultimately with China Motion Telecom International Limited until the transfer of control of CM Tel (USA) LLC to Pacific Networks is approved by the Commission.

Public Interest Statement

Commission authorization of the application is in the public interest because it will increase competition in international communications between the United States and international points, particularly Asia. Pacific Networks resells international voice and data to operators on a wholesale basis pursuant to a Section 214 authorization. CM Tel (USA) LLC engages in retail sales of prepaid or postpaid IDD calling cards, mainly for use in calling from the United States to China, and in wholesale sales of interconnections with U.S. carriers to carry international voice traffic, again largely from the United States to China. Commission authorization of this application will permit Pacific Networks to inject fresh capital to CM Tel (USA) LLC's business and would result in increased efficiencies in the provision of these international services.