

April 22, 2009

**VIA ELECTRONIC FILING**

International Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

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

Dear Sir or Madam:

CM Tel (USA) LLC ("CM Tel"), by its counsel, files this supplement to clarify that the above-referenced application seeks Commission consent to transfer control of only part of the international section 214 authority granted to CM Tel in File No. ITC-214-19990927-00607. CM Tel's current section 214 authorization permits the provision of facilities-based and resale service between the United States and all permissible international points pursuant to section 63.18(e)(1) and (e)(2) of the Commission's rules, 47.C.F.R. § 63.18(e)(1)-(e)(2).

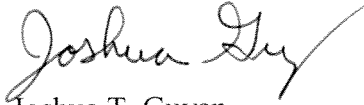
CM Tel clarifies that, with respect to the U.S.-China and U.S.-Hong Kong routes, CM Tel seeks approval to transfer control of only CM Tel's authority to provide international switched services through the resale of unaffiliated U.S. facilities-based carriers' international switched services (either directly or indirectly through the resale of another U.S. resale carrier's international switched services). *See* 47 C.F.R. § 63.10(a)(4); *see also* Transfer of Control Application, File No. ITC-T/C-20080913-00428, Attachment 1 at 6-7. Thus, CM Tel does not seek consent to transfer control of CM Tel's authority to provide service on the U.S.-China and U.S.-Hong Kong routes on a facilities basis, or on a resale basis other than by reselling the switched services of unaffiliated U.S. facilities-based carriers as described above.

CM Tel understands that the Commission will issue a new section 214 authorization to CM Tel with the foregoing restriction on the U.S.-China and U.S.-Hong Kong routes, and that the Commission will cancel CM Tel's current section 214 authorization, effective upon consummation of the transfer of control to Pacific Networks Corp. Upon grant of the above-referenced transfer of control, CM Tel

surrenders any portion of its current section 214 authorization that is not transferred to Pacific Networks pursuant to the above terms.

Sincerely,

SQUIRE, SANDERS & DEMPSEY L.L.P.

A handwritten signature in cursive script, appearing to read "Joshua T. Guyan".

Joshua T. Guyan