

December 9, 2008

Writer's Direct Contact

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Via Electronic Filing

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

Re: Supplement to Application to Transfer Control of BtN Access Limited and Its Wholly-Owned Subsidiaries PCCW Global, Inc. and PCCW Global Limited to Pacific Century Regional Developments Limited, File No. ITC-T/C-20081124-00512

Dear Ms. Dortch:

PCCW Limited ("PCCW") hereby supplements the above-referenced pending Application, which seeks Commission consent to transfer control of PCCW's wholly-owned, indirect subsidiaries BtN Access Limited ("BtN"), PCCW Global, Inc. ("PGI"), and PCCW Global Limited ("PGL"), and the international Section 214 authorizations under which they operate from PCCW to Pacific Century Regional Developments Limited ("PCRD").

In response to Question 12 of the Application, in addition to the interlocking directorates listed in the Application, Alexander Anthony Arena is a director of PCCW, BtN, PCRD, and Reach Ltd. Peter Allen and Richard Li each is a director of both PCRD and PCCW. In response to Question 14 of the Application, in addition to the foreign carrier affiliates listed in the Application, upon consummation of the proposed transaction BtN, PGI and PGL will be affiliated with China Unicom (Hong Kong) Limited, which is licensed to provide telecommunications services in China.

If you have any questions regarding this supplement, please contact the undersigned.

Very truly yours,

/s/ Jennifer L. Kostyu

Jennifer L. Kostyu

cc: David Krech
Sumita Mukhoty