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December 18, 2008

VIA IBFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445-12th Street SW
Washington, D.C. 20554

Re: REACH Ltd
Supplement to Application for Section 214 Authority For the Transfer of
Control of REACH
File No. ITC-T/C-20081215-00534

Dear Ms. Dortch:

REACH Ltd ("REACH"), by its attorney, hereby provides the following information to supplement the Application that is captioned above.

First, REACH requests that China United Network Communications Limited ("China Unicom") replace China Unicom (Hong Kong) Limited ("Unicom HK") in the list of foreign carrier affiliates provided in response to Question 14 in Attachment 1. China Unicom was listed in error. It is REACH's understanding that Unicom HK is a wholly-owned subsidiary of China Unicom.

Second, pursuant to Section 7.2 of the Agreement by and between REACH, Telstra Corporation Limited (ABN 33 051 775 556) ("Telstra"), and PCCW Limited ("PCCW"), on the one hand, and the U.S. Department of Homeland Security, the Federal Bureau of Investigation and the U.S. Department of Justice, on the other, effective November 29, 2001 and amended January 8, 2007 ("Agreement"), REACH hereby requests that the Commission condition the grant of this Application on compliance with the terms of the Agreement.

Please contact the undersigned counsel if you have any questions regarding this matter.

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Sincerely,



Joan M. Griffin