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## Via ECFS and IBFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

**Re: *Joint Application for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission's Rules to Complete a Transfer of Indirect Majority Ownership of the Licensees to AP TeleGuam Holdings, Inc.***  
**WC Docket No. 10-260 and IBFS File Nos. ITC-T/C-20101216-00486, and ITC-T/C-20101216-00478**

Dear Ms. Dortch:

On behalf of GTA Telecom, LLC ("GTA Telecom"), GTA Services, LLC ("GTA Services"), Pulse Mobile, LLC ("Pulse Mobile") (collectively, the "TeleGuam Licensees"), Shamrock TeleGuam Holdings, LLC ("Shamrock") (Shamrock and TeleGuam Licensees collectively, the "TeleGuam Entities"), and AP TeleGuam Holdings, Inc. ("AP TG") (AP TG and TeleGuam Entities, collectively, the "Applicants"), and pursuant to a request by Commission staff, attached please find a copy of the order issued by the Guam Public Utilities Commission ("Guam PUC") and the report issued by the Guam PUC's Administrative Law Judge, both referenced in the Joint Reply Comments filed by the Applicants in the above-referenced dockets on February 24, 2011.

This letter also clarifies statements made in the above-referenced Joint 214 Application.<sup>1</sup> On page 5 of the Joint 214 Application, Applicants stated that as a result of the Merger, the "TeleGuam Entities" would become wholly-owned indirect subsidiaries of AP TG. To clarify, the TeleGuam *Licensees*, rather than the TeleGuam *Entities*, will become wholly-owned

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<sup>1</sup> *Joint Application of Shamrock TeleGuam Holdings, LLC, Transferor, GTA Telecom, LLC, GTA Services, LLC, Pulse Mobile, LLC, Licensees, and AP TeleGuam Holdings, Inc., Transferee, For Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission's Rules to Complete a Transfer of Indirect Majority Ownership of the Licensees to AP TeleGuam Holdings, Inc.*, WC Docket No. 10-260 (filed Dec. 17, 2010) ("Joint 214 Application").

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subsidiaries of AP TG upon consummation of the proposed transaction. The Applicants accurately described the transaction elsewhere throughout the Joint 214 Application and the Commission's Public Notice seeking comment on the Joint 214 Application contains an accurate description of the transaction.

Please contact Jeff Strenkowski at (202) 373-6002 if you have any questions concerning this filing.

Respectfully submitted,



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Attachments