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February 24, 2016

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

via IBFS

Re: Clarification of a *pro forma* transfer of control of KDDI Global, LLC
(File No. ITC-T/C-20160127-00092)

Dear Ms. Dortch:

On January 27, 2016, KDDI Global, LLC (“KDDI Global” or the “Company”),¹ notified the Federal Communications Commission (“FCC” or “Commission”), pursuant to Section 63.24(f) of the Commission’s Rules, of a non-substantive, *pro forma* transaction which took place on December 31, 2015.² Specifically, control of KDDI Global was transferred from KDDI America, Inc. (“KDDI America”), to KDDI US Holding, Inc. (“KDDI US”). As a result, KDDI Global is now a wholly-owned subsidiary of KDDI US. This transaction did not result in any change in the ultimate ownership of KDDI Global nor were any services discontinued.

Commission staff subsequently notified counsel for KDDI Global of a discrepancy in the application regarding the transferor and transferee information. KDDI Global hereby submits this letter to clarify that, in this *pro forma* transaction, KDDI America, Inc. was the Transferor and KDDI US Holding, Inc. was the Transferee.

¹ KDDI Global is a provider of wholesale voice services and holds domestic and international Section 214 authority from the Commission. See File No. ITC-214-20061027-00492 (granted Mar. 28, 2007). Domestic authority was obtained by operation of rule. See 47 C.F.R. §63.01.

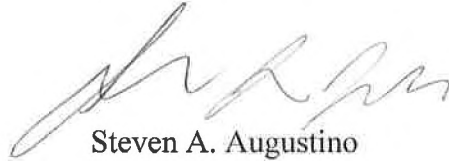
² See *International Section 214 Authorizations for Assignment or Transfer of Control, FCC Form 214TC*, File No. ITC-T/C-20160127-00092 (filed Jan. 27, 2016). The Commission granted the Application on February 18, 2016. See *International Authorizations Granted, Section 214 Applications* (47 C.F.R. § 63.18); *Section 310(b) Requests*, Report No. TEL-01775, Public Notice, DA 16-167 (Feb. 18, 2016).

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

Respectfully submitted,



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