

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
CHINA NETWORK COMMUNICATIONS GROUP)
CORPORATION)
) File No. SCL- _____
and)
)
CHINA UNITED NETWORK COMMUNICATIONS)
GROUP COMPANY LIMITED)
)
Notification of *Pro Forma* Assignment of)
Cable Landing License)

To: Chief, International Bureau

**NOTIFICATION OF
PRO FORMA ASSIGNMENT OF CABLE LANDING LICENSE**

Pursuant to an Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34 – 39, and Section 1.767(g)(7) of the Commission’s Rules, 47 C.F.R. § 1.767(g)(7), China United Network Communications Group Company Limited (formerly China United Telecommunications Corporation) (“China Unicom”) and China Network Communications Group Corporation (“China Netcom” and, together with China Unicom, the “Applicants”) hereby notify the Commission of the *pro forma* assignment of China Netcom’s interest in a submarine cable landing license, SCL-LIC-20070222-00002, for the Trans-Pacific Express (“TPE”) Cable Network to China Unicom as part of an internal restructuring that occurred on January 6, 2009 (retroactively effective as of January 1, 2009).¹

¹ See *Public Notice*, Report No. SCL-00052, 22 FCC Rcd 227 (PD/IB 2008) (granting SCL-LIC-20070222-00002 to the TPE Cable Network Consortium (“TPE Consortium”).

Prior to the government-organized restructuring of the Chinese telecommunications industry, China Unicom and China Netcom were both commonly owned and controlled by the government of the People's Republic of China ("PRC"); each entity held a 13.11 percent ownership interest in the TPE Consortium. As a part of the restructuring, China Unicom absorbed China Netcom, resulting in the assignment of China Netcom's interest in the TPE Consortium to China Unicom, thereby increasing China Unicom's ownership interest in the TPE Consortium from 13.11 percent to 26.22 percent. The restructuring did not, however, change the ultimate ownership or control of the license interests as the PRC government will continue to maintain control over China Unicom. Accordingly, the restructuring steps are *pro forma* in nature. Below is the information required pursuant to Section 1.767 of the Commission's rules.²

Assignor Information in Response to Section 1.767(a)(1)-(3):

Correspondence concerning this notification should be sent to:

Minghua Zhang
Project Manager³
China Network Communications Group Corporation
No. 21 Jinrong Street
Xicheng District
Beijing, China 100032
Telephone Number: +86 10 6625 9372

with a copy of all correspondence to:

Timothy J. Cooney
William R. Layton
Wilkinson Barker Knauer, LLP
2300 N Street, N.W., Suite 700
Washington, DC 20037
Telephone Number: (202) 783-4141

² 47 C.F.R. §§ 1.767. Pursuant to guidance from International Bureau staff, this notification conforms to the relevant provisions of the Commission's Part 63 rules. *See* 47 C.F.R. § 63.24(f).

³ Mr. Zhang served as Project Manager of China Netcom prior to its absorption by China Unicom.

Place of Formation: Prior to the termination of its corporate existence in connection with the merger, China Netcom was organized under the laws of the PRC.

Assignee Information in Response to Section 1.767(a)(1)-(3):

Correspondence concerning this notification should be sent to:

Yan Bo
General Manager, International Services Department
China United Network Communications Group Company Limited
No. 21 Jinrong Street
Xicheng District
Beijing, China 100032
Telephone Number: +86 10 6625 9971

with a copy of all correspondence to:

Timothy J. Cooney
William R. Layton
Wilkinson Barker Knauer, LLP
2300 N Street, N.W., Suite 700
Washington, DC 20037
Telephone Number: (202) 783-4141

Place of Formation: China Unicom is organized under the laws of the PRC.

Assignee's Ownership

Section 63.18(h). China Unicom is the assignee. China Unicom is a state-owned enterprise subject to the supervision of the State-owned Assets Supervision and Administration Commission ("SASAC") of the State Council of the PRC. SASAC is a government entity located at #26, XuanWuMenXi Street, XuanWu District, Beijing, China 100053. The PRC government has a 96.5 percent ownership interest in China Unicom. No other person or entity directly or indirectly holds a ten percent or greater ownership interest in China Unicom.

China Unicom, the assignee, has interlocking directorates with foreign carriers as follows:

Interlocking Directorates	
China Unicom Director and/or Officer	Position Held with Foreign Carrier, Name of Foreign Carrier, and Home Country in which Foreign Carrier is Authorized to Operate
Chang Xiaobing Chairman, Director	Chairman ,Executive Director and Chief Executive Officer China Unicom (Hong Kong) Limited Hong Kong Chairman and Director China United Telecommunications Corporation Limited China Chairman and Director China United Network Communications Corporation Limited China
Tong Jilu Director	Executive Director and Chief Financial Officer China Unicom (Hong Kong) Limited Hong Kong Director China United Telecommunications Corporation Limited China Director China United Network Communications Corporation Limited China
Li Gang Director	Director China United Network Communications Corporation Limited China
Zhang Junan Director	Director China United Network Communications Corporation Limited China Non-executive Director China Communications Services Corporation Limited China
Li Xiong Director	Chairman and General Manager CITC Guoan Communications Co., Ltd.

Interlocking Directorates	
China Unicom Director and/or Officer	Position Held with Foreign Carrier, Name of Foreign Carrier, and Home Country in which Foreign Carrier is Authorized to Operate
	China
Zhang Dongchen Director	Chairman Zhonghua Communications System Co., Ltd. China

Pro Forma Certification

The Applicants hereby certify that the assignment was *pro forma* and that, together with all previous *pro forma* transactions, the assignment does not result in a change in the actual controlling party of the relevant license interests.⁴

Additional Certifications

The Applicants hereby certify that no party to this notification is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁵ China Unicom further certifies that it accepts and will abide by the routine conditions specified at 47 C.F.R. § 1.767(g) of the Commission’s rules.⁶ The undersigned certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.

⁴ See 47 C.F.R. §§ 1.767(g)(7), 63.24(f)(2)(ii).

⁵ 21 U.S.C. § 853(a); 47 C.F.R. § 63.19(o).

⁶ 47 C.F.R. §§ 1.767(a)(9), (g)

CONCLUSION

For the reasons discussed herein, the Applicants respectfully request that the Commission grant authority for the *pro forma* assignment described herein expeditiously, using procedures appropriate in light of the non-substantial nature of this assignment.

Respectfully submitted,

**CHINA NETWORK COMMUNICATIONS GROUP
CORPORATION**

By: /s/ Zuo Xunsheng
Zuo Xunsheng
Authorized Representative
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Xicheng District
Beijing, China 100032

**CHINA UNITED NETWORK COMMUNICATIONS
GROUP COMPANY LIMITED**

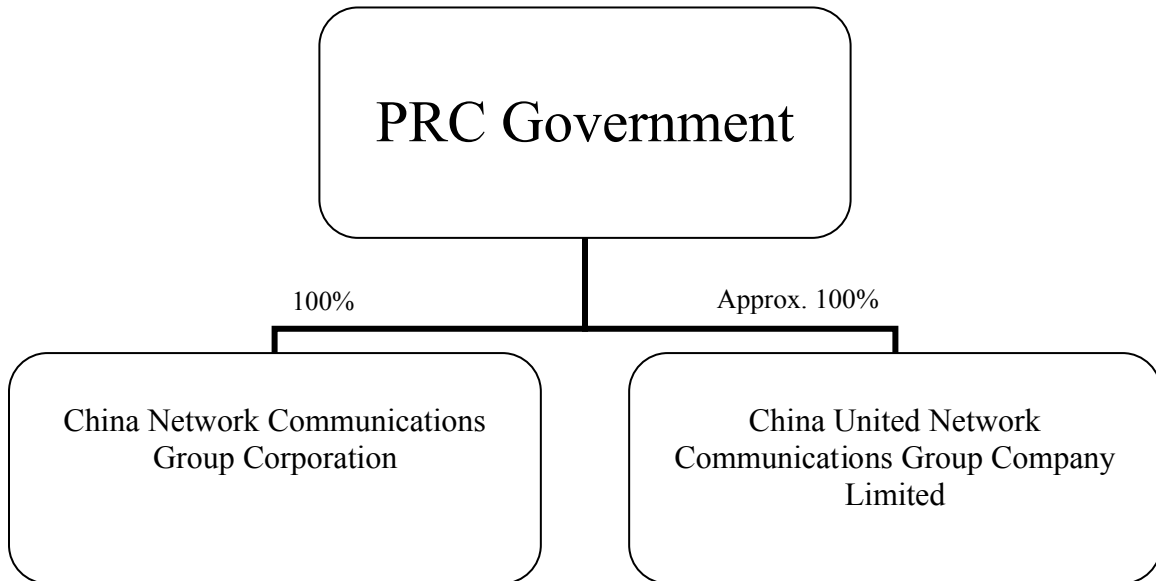
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February 4, 2009

Pre-Reorganization Ownership Structure



Post-Reorganization Ownership Structure

