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February 2, 2015

VIA IBFS

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

Re: Cable Landing License of Pacnet Services (USA) Inc. for Unity Cable System
FCC File No. SCL-LIC-20080516-00010
Notice of *Pro Forma* License Assignments

Dear Ms. Dortch:

Pacnet Services (USA) Inc., (“Pacnet Services”) and Pacnet Limited (“Pacnet Ltd.”) (collectively, the “Parties”), by their attorneys, hereby notify the Commission, in accordance with Section 1.767(g)(7) of the FCC Rules, of a series of two immediately successive *pro forma* assignments of the submarine cable landing license referenced above effective as of the date of this letter.¹

Pacnet Services is a company formed under the laws of the State of Delaware. Pacnet Services is an indirect, wholly owned subsidiary of Pacnet Ltd.

Pacnet Services is a direct, wholly owned subsidiary of Pacnet Global Corporation (S) Pte. Ltd., a Singapore company. Pacnet Global Corporation (S) Pte. Ltd., in turn, is a direct, wholly owned subsidiary of Pacnet Services Corporation Ltd, a Bermuda

¹ See FCC, Public Notice, Actions Taken Under Cable Landing License Act, DA No. 09-2188, FCC File No. SCL-LIC-20080516-00010. (Oct. 8, 2009).

company. Pacnet Services Corporation Ltd is itself a direct, wholly owned subsidiary of Pacnet Ltd. Pacnet Ltd. is a subsidiary of Pacnet International Limited (“Pacnet International”), which controls and owns an equity and voting share of 90.164 percent in Pacnet Ltd. Pacnet International is a company formed under the laws of Bermuda.

The following entities hold a 10 percent or more interest in the Parties through an ownership interest in Pacnet International: Ashmore Cayman SPC Limited re Pacnet Segregated Portfolio (“Ashmore”), which holds 51.233 percent of the issued and outstanding equity,² Spinnaker Capital Pacnet Holdings Ltd. which holds 35.307 percent of the issued and outstanding equity, and Clearwater Undersea Cable Investments, L.P. which holds 13.460 percent of the issued and outstanding equity. No person or entity holds an interest of 10 percent or more in Pacnet International or the Parties other than those identified above.

Pacnet Services, along with several other entities, is a licensee on the non-common carrier Unity Cable System between the United States and Japan.³ With this letter, Pacnet Services provides notice of the assignment, on a *pro forma* basis, of its license for the Unity Cable System to its parent company, Pacnet Ltd. (“*Pro forma* Assignment 1”).

Immediately following *Pro forma* Assignment 1, Pacnet Ltd. will assign, on a *pro forma* basis, its interests in the portions of the Unity Cable System located within U.S. territorial waters and the above-referenced submarine cable landing license to Pacnet Services (“*Pro forma* Assignment 2”).

Following *Pro forma* Assignment 2, Pacnet Ltd. will hold 40 percent participation, equity and voting interests in the Unity Cable System, subject to the assignment of the foregoing interests in the portions of the Unity Cable System located in U.S. territorial waters to Pacnet Services. Within the U.S. territorial waters, Pacnet Services will own and operate two (2) fiber pairs on the Unity Cable System.

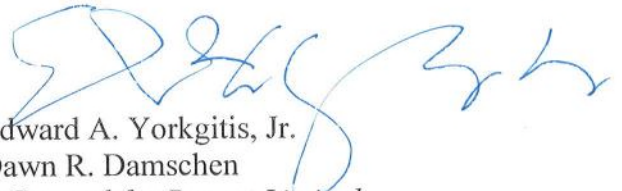
Pacnet Ltd. and Pacnet Services certify, pursuant to 47 C.F.R. § 1.767(g)(7), that the transaction effected by *Pro forma* Assignment 1 and *Pro forma* Assignment 2 was *pro forma*, as defined in 47 C.F.R. § 63.24, and that it, together with all previous *pro forma* transactions, does not result in a change of the ultimate control of the license.

² Three Funds currently hold a 10 percent or greater indirect ownership interest in Pacnet International through Ashmore: Asset Holder PCC Limited in respect of Ashmore Emerging Markets Liquid Investments Portfolio, incorporated in Guernsey (12.987 percent), Ashmore Emerging Markets Debt Fund, incorporated in the Cayman Islands (10.569 percent), and Asset Holder PCC No. 2 Limited in respect of Ashmore Asian Recovery Fund, incorporated in Guernsey (13.986 percent).

³ See n. 1, *supra*.

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

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Edward A. Yorkgitis, Jr.', written in a cursive style.

Edward A. Yorkgitis, Jr.
Dawn R. Damschen
*Counsel for Pacnet Limited
and Pacnet Services (USA) Inc.*

Certificate

I, Sean Gleeson, Acting General Counsel, of Pacnet Limited and Pacnet Services (USA) Inc., hereby certify under penalty of perjury to the following:

1. All of the information contained in the attached notification letter dated February 2, 2015, is true and accurate to the best of my knowledge.
2. Both *Pro forma* Assignment 1 and *Pro forma* Assignment 2, as described in the notification letter, were *pro forma* transactions as defined in 47 C.F.R. § 63.24 and, taken together with all the previous *pro forma* transactions, do not result in a change in the ultimate control of the cable landing license for the Unity Cable System originally issued to Pacnet Services (USA) Inc. in 2009; and
3. No party to this notification is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.



Sean Gleeson
Acting General Counsel
*Pacnet Limited and
Pacnet Services (USA) Inc.*

Date: February 2, 2015