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May 20, 2020

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

Attn: International Bureau

Re: Asia America Gateway Cable System, SCL-LIC-20070824-00015

Dear Ms. Dortch:

Pursuant to Section 1.767(g)(7) of the Commission's rules, AT&T Services, Inc. ("AT&T"), on behalf of Brunei International Gateway Sdn Bhd ("BIG") and Unified National Networks Sdn Bhd ("UNN"), provides notification of the following *pro forma* assignment of the ownership and voting interests in the AAG Cable System held by BIG, which is a licensee for this system.¹

On January 1, 2020, the ownership and voting interests in the AAG Cable System held by BIG were transferred to UNN as part of a restructuring of the telecommunication sector in Brunei Darussalam. BIG and UNN are owned and controlled by the Government of Brunei Darussalam. The direct ownership of both entities is by Darussalam Assets Sdn Bhd, a statutory body owned by the Minister for Finance Corporation (MOFC), which is incorporated under the Constitution of Brunei Darussalam.

Based on the above information provided by UNN, AT&T certifies pursuant to Section 1.767(g)(7) that this assignment is *pro forma* as defined in Section 63.24 and does not result in a change in the licensee's ultimate control. Specifically, the transaction is presumptively *pro forma* pursuant to subsection (5) of Note 2 to paragraph (d) of Section 63.24 as an "[a]ssignment or transfer from a corporation to a wholly owned direct or indirect subsidiary thereof or vice versa, or where there is an assignment from a corporation to a corporation owned or controlled by assignor stockholders without substantial change in their interests."

AT&T, on behalf of BIG and UNN, also respectfully requests that the Commission grant a waiver of the 30-day notification period for this notification. This inadvertent delay is the result of a lack of familiarity with the cable landing license by UNN and difficulties encountered by UNN in attempting to submit this information in late April 2020 following communications from the International Bureau.

Sincerely,

James Talbot
AVP-Senior Legal Counsel

Attn: David Krech, International Bureau
Arthur Lechtman, International Bureau

¹ See *Actions Taken Under the Cable Landing License Act*, 23 FCC Rcd. 10386 (2008).

CERTIFICATION

I am authorized to provide this certification on behalf of Unified National Networks Sdn Bhd.

All of the information contained in this notification is true and correct to the best of my knowledge and belief.

Date: May 20, 2020

Signed: 

Chan Shih Ping
Manager of International Operations
Unified National Networks Sdn Bhd
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Bandar Seri Begawan, BB3713
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