

June 17, 2009

Via IBFS

David Krech
Associate Division Chief
Policy Division, International Bureau
Federal Communications Commission
445 12th Street, S.E.
Washington DC 20554

Re: Australia-Japan Cable, SCL-LIC-20000629-00025

Dear David,

Pursuant to our discussion on June 3, 2009, this letter provides updated information about the shareholding of Australia-Japan Cable Holdings Limited (“AJCHL”). As stated in Australia-Japan Cable (Guam) Limited’s (“AJC Guam”) application for a cable landing license in 2000, AJCHL, a Bermuda corporation, owns 100% of Australia-Japan Cable Limited (“AJCL”). AJCL, a Bermuda corporation, owns 100% of AJC Guam. AJC Guam is the licensee of the Australia-Japan Cable. *See* Australia-Japan Cable (Guam) Limited, Cable Landing License, 15 FCC Rcd. 24057 (2000). At the time AJC Guam’s cable landing license was granted, AJCHL was owned by:

- (1) Telstra Global Networks Limited, a Bermuda corporation (39.99%);
- (2) MCI WorldCom Global Networks Limited, a Bermuda corporation (15.00%);
- (3) Teleglobe, Inc., a Canadian corporation (15.00%);
- (4) Concert Global Network Services Limited, a Bermuda corporation (10.01%);
- (5) Japan Telecom Co. Ltd., a Japanese corporation (10.00%); and
- (6) NTT Communications Corporation, a Japanese corporation (10.00%).

Teleglobe, Inc. returned its shares in July 2005, which modified the remaining shareholders’ interests as follows:

- (1) Telstra Holdings (Bermuda) No. 1 Limited (name change from Telstra Global Networks Limited) (46.93%);
- (2) WorldCom Global Networks Limited (name change from MCI WorldCom Global Networks Limited) (17.64%);

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- (3) Concert Global Network Services Limited (11.88%);
- (4) Softbank Telecom Corp. (name change from Japan Telecom Co. Ltd.) (11.76%); and
- (5) NTT Communications Corporation (11.76%).

Through a series of intermediate subsidiaries, Telstra Holdings (Bermuda) No. 1 Limited is 100% owned by Telstra Corporation Limited (“Telstra”). Telstra is a publicly listed Australian company. At the time of AJC Guam’s application, Telstra was owned 50.1% by the Commonwealth Government of Australia. The remaining shares were publicly traded. The privatization of Telstra was completed in 2006. According to publicly available sources, the largest shareholder of Telstra is an Australian investment fund company, the Future Fund Board of Guardians, which holds approximately 16.08% of the company’s outstanding shares.

At the time of the application, WorldCom Global Networks Limited (formerly named MCI WorldCom Global Networks Limited) was owned through a series of intermediate subsidiaries by MCI Communications Corporation. In 2005, MCI Communications Corporation was acquired by Verizon Communications, Inc.

At the time of the application, Concert Global Network Services Limited (“Concert”) was owned through a series of intermediate subsidiaries by AT&T Corporation (“AT&T”) and British Telecom plc (“BT”). In 2001, BT sold its interest in Concert to AT&T, and Concert is now 100% owned by AT&T.

Softbank Telecom Corp. (formerly named Japan Telecom Co. Ltd.) is a wholly-owned subsidiary of Softbank Corp., a publicly traded Japanese corporation. Softbank Telecom Corp. was acquired by Softbank Corp. in 2004. Accordingly to publicly available information, Son Masayoshi, the President/CEO of Softbank Corp., holds 24.12% of the issued shares of Softbank Corp.

NTT Communications Corporation is a wholly owned subsidiary of Nippon Telegraph and Telephone Corporation (“NTT”). According to publicly available information, the Japanese Minister of Finance currently holds 33.72% of the issued shares of NTT

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Sophie Keefer

cc: David Crofts