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November 9, 2009

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: FLAG Telecom Network USA Limited
Application for Cable Landing License
File No. SCL-LIC-20070329-00006
Supplemental Filing -- Notice of Pro Forma Transfer of Control of Applicant**

Dear Ms. Dortch:

FLAG Telecom Network USA Limited (the “Applicant”) hereby supplements the above-referenced submarine cable landing license application¹ to advise the Commission of a pro forma transfer of control arising from a series of transactions involving the transfer of ownership interests from an entity controlling the Applicant to other corporate affiliates of the Applicant.

More specifically, in a series of transactions that took place on October 10, 2009, and October 31, 2009, respectively, AAA Communications Private Limited (“AAACPL”), an indirect owner of the Applicant, reduced its shareholding interest in Reliance Communications Limited (“RCOM”), an intermediate direct parent of the Applicant, such that AAACPL’s interest in RCOM and, by extension, in the Applicant, decreased from 54.16% to approximately 39.15%.² The aggregate 15% interest transferred by AAACPL went to two corporate affiliates, ADA Enterprises and Ventures Private Limited (“ADAEVPL”) and AAA Industries Private Limited (“AAAIPL”), each of which received an

¹ The application was placed on Public Notice on December 26, 2007 (*see* FCC Report No. SCL-00051NS) and remains pending.

² *See* Exhibit 1 for a diagram depicting the corporate structure prior to the pro forma transactions.

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additional aggregate interest of 7.50%, and thereby increased each of their ownership interests in RCOM and, by extension, in the Applicant, from 4.61% to 12.11%.³

This change in ownership interests, which results in AACPL going from holding a greater than 50% interest to holding a less than 50% (but still controlling) interest in the Applicant, does not change the ultimate ownership or control of the Applicant. RCOM continues to be the ultimate corporate parent of the Applicant, and RCOM, in turn, continues to be majority-owned and controlled by Mr. Anil Ambani.

As the foregoing transactions (1) resulted in no actual change in control over the Applicant; (2) resulted in no change in the entities contained in the corporate structure above the Applicant; and (3) merely resulted in an indirect owner of the Applicant going from holding a greater than 50% interest to holding a less than 50% (but still controlling) interest in the Applicant, they were pro forma as defined in Section 63.24 of the Commission's Rules. 47 C.F.R. § 63.24 (d) ("Transfers of control or assignments that do not result in a change in the actual controlling party are considered non-substantial or pro forma."); *see also id.*, Note 2 to Paragraph (d) ("Assignment or transfer from a corporation to a wholly owned direct or indirect subsidiary thereof, or vice versa" and "Corporate reorganization that involves no substantial change in the beneficial ownership of the corporation" are presumptively pro forma).

If you have any questions regarding this supplement, please contact the undersigned.

Respectfully submitted,

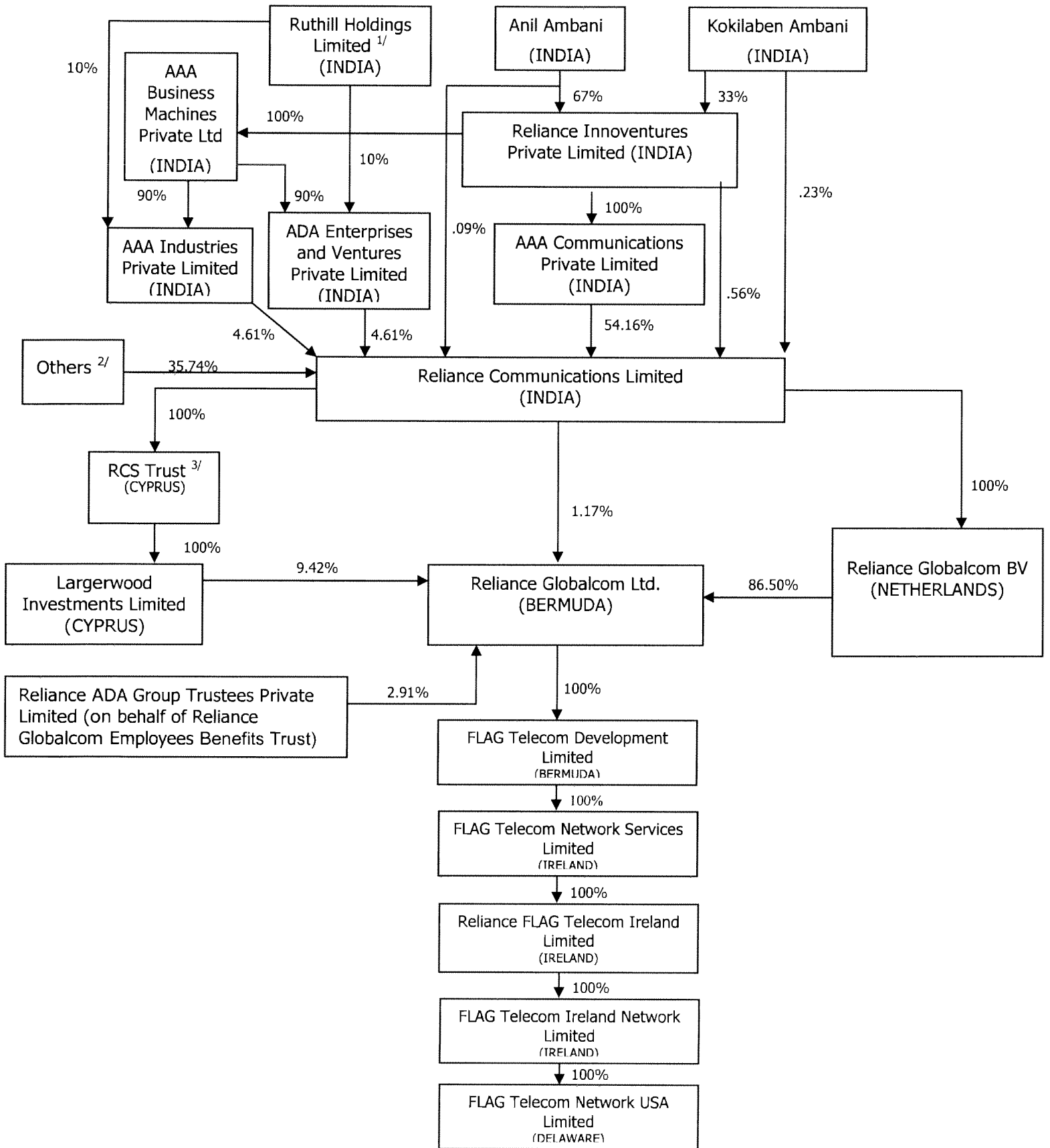
/s/

Christopher C. Tai
Rhonda M. Bolton

Counsel for FLAG Telecom Network USA Limited

³ See Exhibit 2 for a diagram depicting the corporate structure after the pro forma transactions.

Exhibit 1
Reliance Corporate Structure Before October 10, 2009

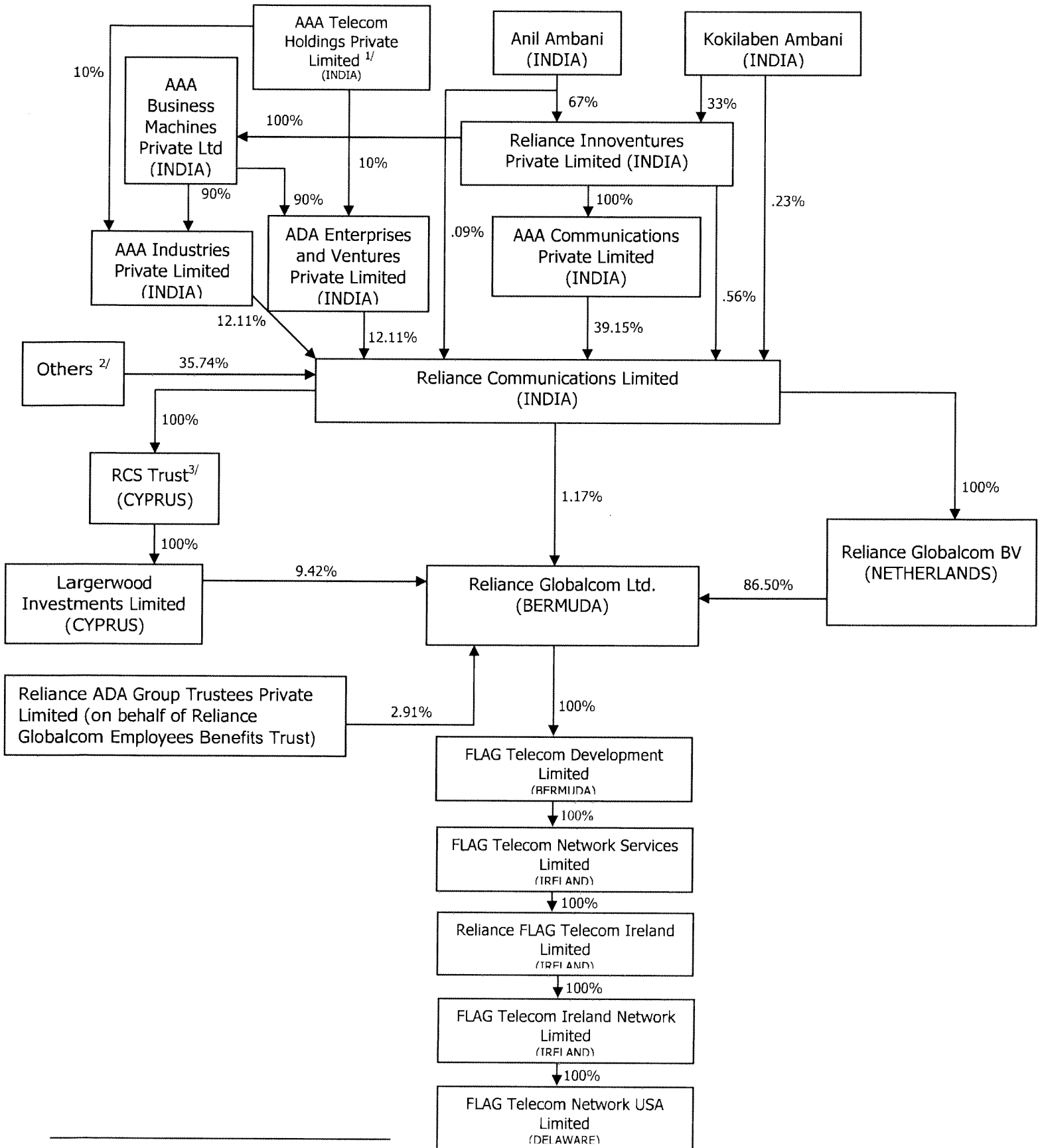


1/ This entity subsequently changed its name to AAA Telecom Holdings Private Limited.

2/ Consists of millions of shareholders, the vast majority of which individually holds a less than 1% interest in RCOM.

3/ The 100% economic interest of the RCS Trust will remain with Reliance/Reliance Subsidiaries.

Exhibit 2
Reliance Corporate Structure After October 31, 2009



^{1/} Previously known as Ruthill Holdings Limited.

^{2/} Consists of millions of shareholders, the vast majority of which individually holds a less than 1% interest in RCOM.

^{3/} The 100% economic interest of the RCS Trust will remain with Reliance/Reliance Subsidiaries.