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July 20, 2007

VIA COURIER

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

FILED/ACCEPTED

JUL 2 0 2007

DATE STAMP & RETURN

Federal Communications Commission Office of the Secretary

Re:

Sydney-Hawaii Cable System Application - File No. SCL-LIC-20070621-00009

Dear Ms. Dortch:

We are writing on behalf of Telstra Incorporated ("Telstra USA") in response to the International Bureau's request to provide additional information in connection with the above-referenced application. <u>First</u>, enclosed are separate certifications from Telstra USA and ATTC indicating that each applicant is aware of and will abide by the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456, and the implementing regulations adopted by the National Oceanic and Atmospheric Administration, 15 C.F.R. part 930, subpart D. <u>Second</u>, ATTC will own and control the landing station in Keawaula, Hawaii, and Telstra USA will own and control the portion of the cable system located in territory subject to U.S. jurisdiction. Accordingly, as required by Section 1.767(g)(11) of the Commission's rules, Telstra USA and ATTC, as licensees will maintain *de jure* and *de facto* control over the entire U.S. portion of the cable system and, therefore, they will maintain *de jure* and *de facto* control regarding matters that will affect the U.S. portion of the cable system (*e.g.*, operations, maintenance, upgrades and decommissioning) sufficient to comply with the requirements of the Commission and any license conditions. Telstra hereby confirms that, apart from Telstra USA, there is no other entity with a 5% or greater interest in the cable system that will use the U.S. points of the cable system. Marlene H. Dortch July 20, 2007 Page Two

Please contact the undersigned with any questions.

Very truly yours,

Randell W. Sifers

Randall W. Sifers Counsel to Telstra Incorporated

Enclosures

cc: David Krech (via email) Service List (see attached)

CERTIFICATION

I am authorized to enter this certification on behalf of AT&T Corp. in connection with FCC File No. SCL-LIC-20070621-00009.

I hereby certify that AT&T Corp. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

Keith J. Epstein Vice President & General Counsel AT&T Corp. One AT&T Way Bedminster, New Jersey 07921 (908) 234-5688

For and on behalf of AT&T Corp.

Date: July 9, 2007

DC01/SIFER/301466.1

CERTIFICATION

I am authorized to enter this certification on behalf of Telstra Incorporated in connection with FCC File No. SCL-LIC-20070621-00009.

I hereby certify that Telstra Incorporated is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

Amy Rosen

General Counsel Telstra Incorporated 40 Wall Street 40th Floor New York, New York 10005 (212) 863-2800

For and on behalf of Telstra Incorporated

Date: July 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that the foregoing letter was served by first-class mail on July 20, 2007.

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