

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
BHARTI AIRTEL LIMITED, GLOBAL)
TRANSIT LIMITED, GU HOLDINGS INC.,)
KDDI CORPORATION, PACNET SERVICES)
(USA) INC., and SINGAPORE) File No. SCL-LIC-20080516-00010
TELECOMMUNICATIONS LIMITED)
)
Application for a License to Construct, Land,)
and Operate an Undersea Fiber Optic Cable)
Connecting the United States and Japan)

**MINOR AMENDMENT AND SUPPLEMENT TO
APPLICATION FOR A CABLE LANDING LICENSE**

Pursuant to Section 1.65 of the Commission’s rules, 47 C.F.R. § 1.65, the parties to the Unity Cable System (“Unity”), through undersigned counsel, file this minor amendment to their Application for a License to Construct, Land, and Operate an Undersea Fiber Optic Cable Connecting the United States and Japan (“Application”).¹ Applicant Singapore Telecommunications Limited (“SingTel”) advises of its intent to transfer its rights, claims, and interests relating to those portions of Unity that are located in U.S. territorial waters to its U.S. operating subsidiary, Singapore Telecom USA, Inc. (“SingTel USA”). Applicant Global Transit Limited (“Global Transit”) advises the Commission of certain changes to its ownership structure.

Applicants submit that this filing is a minor amendment under the Commission’s rules and does not require public notice and comment. SingTel USA, a California corporation, is a direct wholly-owned subsidiary of SingTel. Except for the change of legal entity, there is no

¹ *In re Matter of Bharti Airtel Limited, Global Transit Limited, GU Holdings Inc., KDDI Corporation, Pacnet Services (USA) Inc., and Singapore Telecommunications Limited, Application for a License to Construct, Land, and Operate an Undersea Fiber Optic Cable Connecting the United States and Japan, Application for Cable Landing License, Streamlined Process Requested, File No. SCL-LIC-20080516-00010, § IV(D) (May 16, 2008).*

material change to the information provided in the Application regarding SingTel. This change does not affect the information provided for the other Unity parties, the ultimate ownership of Unity, or the management structure and operation of Unity. Likewise, the revised ownership information for Global Transit does not change any of the other information provided for the company, the other Unity parties, or the Unity cable.

SingTel USA attaches a revised Appendix F that updates the information requested by 47 C.F.R. § 1.767(a)(1)-(3) and (8)-(9), (g) and (k); 47 C.F.R. § 63.18(h)-(k) and (o); and 47 C.F.R. §§ 1.2001-1.2003. Because of the change in applicant, SingTel USA also provides a new Certification. Global Transit attaches a revised Appendix B that updates its response to 47 C.F.R. § 63.18(h). All other information for Global Transit remains the same.

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

Respectfully submitted,



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Counsel for Applicants

Dated: November 24, 2008

AMENDED APPENDIX F FOR SINGAPORE TELECOM USA, INC.

AMENDED APPENDIX F – SINGAPORE TELECOM USA, INC.

Singapore Telecom USA, Inc. (“SingTel USA”) is the U.S. operating subsidiary of Singapore Telecommunications Limited (“SingTel”). SingTel USA is a corporation formed under the laws of the State of California. SingTel USA’s principal business activity is to provide international telecommunications service from the United States to the rest of the world. The nature of operations in the United States is sales, marketing and technical operations. SingTel USA currently holds authority from the Commission pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as a global facilities-based and resale carrier in accordance with Sections 63.18(e)(1) and 63.18(e)(2) of the Commission’s rules.¹

SingTel, SingTel USA’s parent company, is a company incorporated under the laws of the Republic of Singapore. SingTel is a global provider providing a range of communications services in Singapore and select foreign countries. SingTel offers long distance service, high-capacity connections, and a variety of other voice and data services, primarily to business customers. SingTel owns, operates, monitors and maintains extensive communications networks, with facilities in Singapore and other countries throughout the Asia-Pacific, North America and Europe. The company is involved in more than 35 submarine cable networks carrying mission-critical traffic for multinational customers worldwide. Additional information regarding SingTel is available at <http://welcome.singtel.com/default.asp>.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)

(1) Name, Address and Telephone Number of the Applicant

Singapore Telecom USA, Inc.
1000 Marine Parkway Suite 100
Redwood City, CA 94065
Tel: (650) 508-6800
Fax: (650) 508-1579

(2) Place of Formation

SingTel USA is incorporated under the laws of the State of California.

¹ File Nos. ITC-214-19981118-00808; ITC-214-19981118-00807; ITC-214-19981005-00681; ITC-214-19981005-00680.

(3) Correspondence concerning the application should be sent to the following:

Ooi Seng Keat
Director, Submarine Cable and Ventures
Singapore Telecommunications Limited
31 Exeter Road
#23-00 Comcentre
Singapore 239732
Tel: (65) 6838-1523
Fax: (65) 6738-1766

With a copy to:

Linette Lee
Director, Consortium Cable Investment
Singapore Telecommunications Limited
31 Exeter Road
#23-00 Comcentre
Singapore 239732
Tel: (65) 6838-2306
Fax: (65) 6738-1766

(4) Certification and Ownership Information Requested by Sections 63.18(h)-(k) and (o) of the Commission's Rules

Information requested by Section 63.18(h):

SingTel USA is wholly owned by:

Name: Singapore Telecommunications Limited ("SingTel")
Address: 31 Exeter Road, Comcentre, Singapore 239732
Ownership: 100% direct
Place of Formation: Singapore
Principal Business: Provision of communications services.

As of June 18, 2007, the only person holding a 10% percent or greater interest in SingTel is:

Name: Temasek Holdings (Private) Limited ("Temasek Holdings")
Address: 60B Orchard Road
#06-18 Tower 2
The Atrium@Orchard
Singapore 238891
Ownership: 55.96% (54.14 direct and 1.82 indirect)
Place of Formation: Singapore
Principal Business: Investment company that owns and manages its assets on a commercial basis.

Temasek Holdings is wholly owned by:

Name: Minister for Finance, Inc.
Address: 100 High Street #06-03
The Treasury
Singapore 179434
Ownership: 100% (representing a 55.96% indirect interest in SingTel)
Place of Formation: Singapore
Permitted Activities: The Minister for Finance, Inc. may acquire, purchase, take, hold and enjoy movable and immovable property of every description, and may convey, assign, surrender and yield up, mortgage, demise, reassign, transfer or otherwise dispose of, or deal with, any movable or immovable property vested in the entity upon such terms as it deems fit.

Minister for Finance, Inc. is controlled by the Minister for Finance of the Government of Singapore.

The remainder of SingTel's issued ordinary shares are publicly traded. Based on information available to SingTel as of May 30, 2007, approximately 5.5% of SingTel's publicly-traded shares are held by The Capital Group Companies, Inc.

Name: The Capital Group Companies, Inc.
Address: 333 S. Hope Street, 53rd Floor
Los Angeles, CA 90071
Telephone: 213-486-9988
Ownership: 5.5%
Place of Formation: United States
Principal Business: Investment management

To the knowledge of Applicant, except for the interest of the Minister for Finance of the Government of Singapore, no foreign government has an ownership interest in SingTel.

Information requested by Section 63.18(i):

SingTel USA's parent company, SingTel, is a foreign carrier, as that term is defined by Section 63.09 of the Commission's Rules. In Singapore, SingTel, directly and through its subsidiaries, is licensed to provide various telecommunications services to the public. In addition, SingTel provides telecommunications services to the public through affiliates operating in the following countries:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
SingTel Optus Pty Limited	Australia
Singapore Telecom Hong Kong Limited	Hong Kong
Singapore Telecom Japan Co Ltd	Japan
Singapore Telecommunications Korea Limited	South Korea
SingTel Taiwan Limited	Taiwan
SingTel (Europe) Limited	United Kingdom

Information requested by Section 63.18(j):

As noted above, SingTel's affiliate, Singapore Telecommunications Japan Co Ltd ("SingTel Japan") is a foreign carrier in Japan.

Information requested by Section 63.18(k):

Japan has been a full member of the WTO since January 1, 1995. Further, Singapore Telecommunications Japan Co Ltd is a competitive entrant and lacks market power in Japan.

Information requested by Section 63.18(o):

SingTel USA certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(5) Routine Conditions Specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g)

SingTel USA certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

ELIGIBILITY FOR STREAMLINED PROCESSING - 47 C.F.R. § 1.767(k)

SingTel USA is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. Although SingTel Japan, is a foreign carrier in Japan under Section 63.09 of the Commission's rules, it is a competitive entrant and lacks sufficient market power in Japan to affect competition adversely on the U.S.-Japan route. Finally, Japan is a WTO Member. Accordingly, streamlined treatment is appropriate.

AMENDED APPENDIX B FOR GLOBAL TRANSIT LIMITED

AMENDED APPENDIX B – GLOBAL TRANSIT LIMITED

Global Transit Limited (“GTL”) operates the fastest growing IP Transit network in South Asia. The company's content rich network provides high availability services to leading service providers and enterprises across the region. Global Transit is headquartered in Kuala Lumpur and is an affiliate of The AIMS Asia Group, a pan-Asian operator of network neutral data centers. Additional information regarding Global Transit is available at <http://www.aims.com.my/globaltransit.htm>.

Global Transit and its affiliates do not hold authority under Section 214 of the Communications Act of 1934, as amended, or the Cable Landing License Act.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767 (a)

1. Name, Address and Telephone Number of the Applicant

Global Transit Limited
18th Floor, Menara Aik Hua
Cangkat Raja Chulan
50200 Kuala Lumpur, Malaysia
Tel: +60320314988

2. Place of Formation

GTL is formed under the laws of Malaysia.

3. Correspondence concerning the application should be sent to the following:

Afzal Abdul Rahim, Chief Executive Officer
Global Transit Ltd
18th Floor, Menara Aik Hua
Cangkat Raja Chulan
50200 Kuala Lumpur, Malaysia
Tel: +60 (3) 2031 4988
Fax: +60 (3) 2031 8948
Email: afzal.rahim@aims.com.my

With a copy to:

Ng MyMin
Ho, Loke & Koh
A-1-1, Megan Phileo Promenade
189, Jalan Tun Razak
50400 Kuala Lumpur, Malaysia
Email: ngwm@hkk.com.my

4. Certification and Ownership Information Requested by Sections 63.18 (h)-(k) and (o) of the Commission's Rules

Information requested by Section 63.18 (h):

The following entities and persons have a 10% or greater ownership interest in Applicant Global Transit Limited ("Global Transit"):

Name: Megawisra Sdn Bhd
Address: Suite 9.2A, 9th Floor
Menara Aik Hua, Cangkat Raja Chulan
50200 Kuala Lumpur, Malaysia
Ownership: 42.9%
Place of Formation: Malaysia
Principal Business: Telecommunication services

Name: Halfmoon Bay Capital Limited ("Halfmoon Bay")
Address: Trident Chambers, PO Box 146, Road Town,
Tortola, British Virgin Islands
Ownership: 20.46%
Place of Formation: British Virgin Islands
Principal Business: Private Equity Investments

Name: Accurate Gain Profits Limited
Address: PO Box 957, Offshore Incorporation Centre
Road Town, Tortola, British Virgin Islands
Ownership: 12.27%
Place of Formation: British Virgin Islands
Principal Business: Private Equity Investments

Name: Continuum Capital Sdn Bhd
Address: Level 33, Tower 2, Petronas Twin Towers
Kuala Lumpur City Centre, 50088
Kuala Lumpur, Malaysia
Ownership: 12.27%
Place of Formation: Malaysia
Principal Business: Private Equity Investments

Name: Nicholas Ping LIM
Address: Apartment 9, Pavillions on the Bay
501, Glebe Point Road,
Glebe, NSW, Australia 2037
Ownership: 12.1%
DOB/ Place of Birth: Malaysia
Principal Business: Telecommunication services

Megawisra Sdn Bhd is wholly-owned by:

Name: Megawisra Investment Ltd
Address: Akara Building, 24 De Castro Street
Wickhams Clay I
Road Town, Tortola, British Virgin Islands
Ownership: 100%
Place of Formation: British Virgin Islands
Principal Business: Investment holdings

Each of the following persons has an ownership interest in Megawisra Investment Ltd that represents an indirect ownership interest in Global Transit of 10% or greater:

Name: Afzal Abdul Rahim
Address: 27, Jalan Cinta Alam
Country Heights
43000 Kajang, Malaysia
Ownership: 75% ownership of Megawisra Investment Ltd (32.2% interest in GTL)
Principal Business: Investments and promotion of various businesses

Name: Gan Te-Shen
Address: No. 29, Jalan Taman Seputeh 2
Taman Seputeh
58000 Kuala Lumpur, Malaysia
Ownership: 25% ownership of Megawisra Investment Ltd (10.7% interest in GTL)
Principal Business: Investments and promotion of various businesses

Each of the following persons/companies has an ownership interest in Halfmoon Bay that represents an indirect ownership interest in Global Transit of 10% or greater:

Name: Nik Anida Bte Nik Manshor
Address: Suite 10.3 10th Floor West Wing Rohas Perkasa
9 Jalan P Ramlee, 50250 Kuala Lumpur
Ownership: 66.64% ownership of Halfmoon Bay (13.6% interest in GTL)
Principal Business: Investment and promotion of various businesses

Continuum Capital Sdn Bhd is wholly owned by:

Name: Pulau Tiga Ventures Sdn Bhd
Address: Level 33, Tower 2, Petronas Twin Towers
Kuala Lumpur City Centre, 50088
Kuala Lumpur, Malaysia
Ownership: 100%
Principal Business: Investment Holding

Pulau Tiga Ventures Sdn Bhd is wholly owned by:

Name: Khazanah Nasional Berhad
Address: Level 33, Tower 2, Petronas Twin Towers
Kuala Lumpur City Centre, 50088
Kuala Lumpur, Malaysia
Ownership: 100%
Principal Business: Investment Holding

All of the equity of Khazanah Nasional Berhad is owned by Minister of Finance (MOF Inc), which is in turn owned by the Malaysian Ministry of Finance. In essence Khazanah is a wholly-owned entity of the Malaysian Government.

No other person or entity holds a 10% or greater direct or indirect interest in GTL.

Applicant does not have any interlocking directorates with a foreign carrier.

Information requested by Section 63.18(i):

GTL or its affiliates are authorized to engage in provision of telecommunications services in the following jurisdictions.

Affiliate Name	Country Where Licensed
Global Transit (Hong Kong) Limited	Hong Kong
Global Transit Communications Sdn. Bhd.	Malaysia
Global Transit Singapore Pte Ltd	Singapore

Information requested by Section 63.18(j):

GTL and its affiliates are not licensed carriers in Japan.

Information requested by Section 63.18(k):

Not applicable.

Information requested by Section 63.18(o):

Global Transit Limited certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988

5. Routine Conditions Specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R § 1.767(g)

Global Transit Limited certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

ELIGIBILITY FOR STREAMLINED PROCESSING PURSUANT TO 47 C.F.R. § 1.767(k)

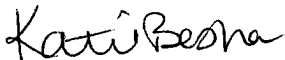
GTL is eligible for streamlined processing under the FCC's rules pursuant to 47 C.F.R. § 1.767(k) because it is not a foreign carrier in Japan and it is not affiliated with a foreign carrier in Japan.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following:

<p>Hillary Morgan Defense Information Systems Agency Code RGC 701 S. Courthouse Road Arlington, VA 22204 (via first class U.S. mail, postage prepaid)</p>	<p>Ambassador David Gross U.S. Coordinator EB/CIP U.S. Department of State 2201 C Street, N.W. Washington, D.C. 20520-5818 (via first class U.S. mail, postage prepaid)</p>
<p>David Krech International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 (via electronic mail to David.Krech@fcc.gov)</p>	<p>Kathy Smith Office of Chief Counsel/NTIA U.S. Department of Commerce 14th Street and Constitution Ave., N.W. Washington, D.C. 20230 (via first class U.S. mail, postage prepaid)</p>
<p>Susan O'Connell International Bureau Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 (via electronic mail to Susan.O'Connell@fcc.gov)</p>	



Katie Besha
November 24, 2008