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June 23, 2008

Via Courier

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

**Re: File No. SCL-LIC-20080516-00010 - Supplement to
Application for a License to Construct, Land, and Operate an
Undersea Fiber Optic Cable Connecting the United States and
Japan**

Dear Ms. Dortch:

This supplement is filed in connection with the above-captioned Application for a license to Construct, Land, and Operate an Undersea Fiber Optic Cable Connecting the United States and Japan, filed with the FCC on May 16, 2006. This supplement provides additional information with respect to the operation of the primary Network Operations Center for the Unity Cable System.

Enclosed please find an original and six copies. Please contact the undersigned should you have any questions concerning this submission. Please date-stamp the enclosed extra copy of this cover letter and return it with the courier.

Respectfully submitted,



Katie B. Besh

FILED/ACCEPTED

JUN 23 2008

Federal Communications Commission
Office of the Secretary

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

FILED/ACCEPTED
JUN 23 2008
Federal Communications Commission
Office of the Secretary

In the 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)

File No. SCL-LIC-20080516-00010

SUPPLEMENT TO APPLICATION FOR A CABLE LANDING LICENSE
STREAMLINED PROCESSING REQUESTED

This supplement is filed in connection with the above-captioned Application for a License to Construct, Land, and Operate an Undersea Fiber Optic Cable Connecting the United States and Japan (“Application”), filed with the Federal Communications Commission (“FCC”) on May 16, 2008, to provide additional information with respect to the operation of the primary Network Operations Center for the Unity Cable System (“Unity”).

In connection with the construction and operation of Unity, Applicants have entered into a NOC Operations and Administrations Agreement (the “NOC Agreement”) between Singapore Telecommunications Ltd. (“SingTel”) and the remaining Applicants. Pursuant to the NOC Agreement, the Network Operations Center (“NOC”) for Unity will be located in Singapore and will be operated and administered by SingTel on behalf of Applicants.

The NOC will provide a variety of specified functions related to the operation and management of the Common Infrastructure of Unity. Most fundamentally, the NOC will be

responsible for ensuring that Unity is operated and maintained in accordance with the performance levels established by the Unity parties and by international standards. This responsibility will include the ongoing monitoring of the Common Infrastructure of Unity, the collection and analysis of performance data from the various segments of the system, the coordination and oversight of routine maintenance, and the identification and resolution of faults affecting the Common Infrastructure.

The NOC also will play a role in the activation, maintenance, and deactivation of capacity on the system, as well as the provisioning of equipment necessary to activate additional capacity. Specifically, the NOC will receive requests from an Applicant to activate (or deactivate) a portion of that Applicant's capacity and take the steps necessary to ensure that the requested capacity is provisioned in a timely manner. The NOC will serve as the point of contact for Applicants and their customers for issues related to the performance of capacity on Unity. Finally, the NOC will maintain the circuit database and the capacity ownership records for Unity.

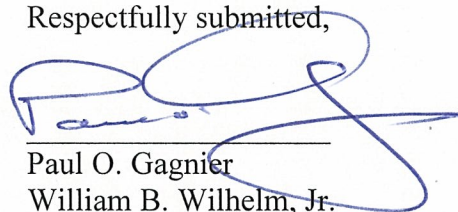
As described in the Application, a second, redundant, NOC will be located in the U.S. and will be controlled by Applicant GU Holdings. The Singapore NOC will have primary responsibility for the operation and administration of those portions of Unity located outside of the United States and will have secondary responsibility for those portions located in U.S. territory. Conversely, the U.S. NOC will be the primary NOC for the U.S. portions of Unity and will be the backup for all segments located outside U.S. territory. Because of this division of responsibility, the Singapore NOC also will be responsible for liaising with the U.S. NOC for operation and maintenance matters related to the U.S.-based facilities.

Aside from its responsibilities related to the activation and maintenance of capacity on Unity, as described above, the NOC will have no role in the provision of services to customers of

the Applicants or any ability to dictate how the Applicants utilize their assigned capacity. The NOC will not have access to customer information or records. More fundamentally, the NOC will receive only aggregate information regarding the usage by each Applicant of its assigned capacity and will be unable to determine how an Applicant is using its capacity, much less access the content of the communications of an Applicant or an Applicant's customers.

Please do not hesitate to contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,



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Counsel for Applicants

Dated: June 23, 2008

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, DC 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>
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Katie Besha
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