



1200 18TH STREET, N.W.
SUITE 1200
WASHINGTON, D.C. 20036-2516
UNITED STATES OF AMERICA

TEL +1 202 730 1337
FAX +1 202 730 1301
WWW.HARRISWILTSHIRE.COM

12 January 2009

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Joint Cable Landing License Application of American Samoa Hawaii Cable, LLC, Pac-Rim Redeployment, LLC, and AST Telecom, LLC, FCC File No. SCL-LIC-20080814-00016

Dear Ms. Dortch:

By their counsel, American Samoa Hawaii Cable, LLC (“ASHC”), Pac-Rim Redeployment, LLC (“PRR”), and AST Telecom, LLC, d/b/a/ Blue Sky Communications (“Blue Sky”) (together with ASHC and PRR, “Applicants”), hereby respond to two questions posed by the International Bureau staff in a December 23, 2008, e-mail regarding the Applicants’ cable landing license application American Samoa-Hawaii Cable System (“ASHC System”).¹ This letter addresses each of the two questions.

I. Details re Earth Stations Serving American Samoa

In their e-mail, the International Bureau staff requested (1) a listing of all the earth stations that serve American Samoa, (2) ownership details for those owns the earth stations,

¹ See Joint Application of American Samoa Hawaii Cable, LLC, Pac-Rim Redeployment, LLC, and AST Telecom, LLC, d/b/a/ Blue Sky Communications for Cable Landing License, FCC File No. SCL-LIC-20080814-00016 (filed Aug. 13, 2008) (“Application”).

Ms. Marlene H. Dortch
 Federal Communications Commission
 12 January 2009
 Page 2 of 4

(3) confirmation of whether those earth stations operate on a common carrier or non-common carrier basis, and (4) details regarding the satellites used by each of those earth stations.

To the Applicants knowledge, American Samoa is presently served by three earth stations and will soon be served by an additional three earth stations. The particulars of these earth stations are summarized in Table 1 below.

Table 1: Earth Stations Serving American Samoa				
Call Sign	Owner	Operational Status	Regulatory Classification	Satellites Used
E990019	American Samoa License, Inc. (“ASL”) ²	In service	Common-carrier	Intelsat 602; JCSat2
KA33	Samoa Technologies, Inc. (“STI”) ³	In service	Non-common-carrier	Intelsat 701; NSS-5
E080182	American Samoa Telecommunications Authority (“ASTCA”)	Expected to commence service by 2Q 2009	Non-common-carrier	To be determined
E080183	ASTCA	Expected to commence service by 2Q 2009	Non-common-carrier	To be determined
E080184	ASTCA	Expected to commence service by 2Q 2009	Non-common-carrier	To be determined
Unknown	Pacifica IT d/b/a TOA Com or a third party doing business with it ⁴	In service	Unknown	Unidentified Ku-Band satellite

² ASL is an affiliate of Blue Sky, an Applicant for the ASHC System cable landing license.

³ STI currently provides exclusive service to ASTCA, American Samoa’s local exchange carrier. This arrangement will likely change once ASTCA’s own earth stations become operational.

⁴ The Applicants understand that this earth station operated by or in conjunction with the prepaid VoIP carrier business of Pacifica IT d/b/a TOA Com. See www.toacom.net. The Applicants have been unable to confirm any additional ownership or technical details regarding this earth station, which does not appear in the FCC’s licensing records available through the International Bureau Filing System.

Ms. Marlene H. Dortch
Federal Communications Commission
12 January 2009
Page 3 of 4

As Table 1 reveals, international capacity is available in American Samoa on a common-carrier basis through ASL. Moreover, once ASTCA transitions its traffic from STI to its own earth stations, STI will have additional incentive to compete with other providers of international connectivity.

In terms of competition from satellites, the Applicants believe that the ASHC System's principal competitor will be O3b Networks Ltd. ("O3b"), the Jersey (Channel Islands)-based satellite company that is building a medium-Earth-orbit ("MEO") NGSO constellation principally to provide broadband services in the Ka band.⁵ With the financial backing of Google, HSBC Principal Investments, and Liberty Global, O3b has already entered into supply and launch agreements with Thales Alenia Space, Gilat, and Sea Launch, and instructed Thales Alenia Space to proceed with the construction of 16 initial satellites, which are scheduled to enter into service in late-2010.⁶ Consequently, the Applicants believe that a variety of networks and facilities will compete vigorously with the ASHC System.

II Update on the Status of the South Pacific Islands Network

In their e-mail, the International Bureau staff also requested a status update on the South Pacific Islands Network ("SPIN") system, including a timetable for SPIN's deployment to American Samoa. SPIN's development and deployment continues to progress in line with the general timetable set forth in the attachment to the Applicant's September 25, 2008, supplementary letter to the Commission.⁷ SPIN invited supplier tenders in September 2008, four

⁵ See O3b Networks Ltd. Company Backgrounder, available at www.o3bnetworks.com/company_backgrounder.html.

⁶ See *O3b Links With Google for Fast Satellite Internet Capacity*, THE NEW YORK TIMES (Sept. 9, 2008), available at www.nytimes.com/idg/IDG_852573C400693880002574BF00346775.html?ref=technology; *Thales Alenia Space building a new satellite constellation for O3b Networks Ltd.*, Press Release (Sept. 9, 2008), available at www.thalesgroup.com/Press-Room/Press-Release-search-all/Press-Release-search-result/Press-Release-Article.html?link=7c394e3c-553b-3531-437e-7a7528334a4e:central&locale=EN-gb&Title=Thales+Alenia+Space+building+a+new+satellite+constellation+for+O3b+Networks+Ltd.&dis=1.

⁷ See *SPIN: Offering Better Connectivity to South Pacific Markets* (presented at Oceania.com, Sydney, July 2007) ("SPIN Overview"), attached as Exhibit 1 to Letter from Kent D. Bressie to FCC Secretary Marlene H. Dortch, FCC File No. SCL-LIC-20080814-00016 (filed Sept. 25, 2008).

HARRIS, WILTSHIRE & GRANNIS LLP

Ms. Marlene H. Dortch
Federal Communications Commission
12 January 2009
Page 4 of 4

months later than the target date of May 2008.⁸ In November 2008, SPIN received at least 3 bids from major suppliers and is currently evaluating those bids, meaning that the supplier selection process has extended beyond the target supplier selection date of August 2008.⁹ The Applicants understand that SPIN's target ready-for-service date—including connectivity to American Samoa—is still late-2010. This understanding is consistent with the Applicants' knowledge of cable ship availability and available capacity at the major suppliers' cable factories.

* * * * *

Should you have any questions regarding this letter or require additional information, please contact me by telephone at +1 202 730 1337 or by email at kbressie@harriswiltshire.com.

Respectfully submitted,



Kent D. Bressie
*Counsel for American Samoa Hawaii Cable, LLC,
Pac-Rim Redeployment, LLC, and AST Telecom, LLC
d/b/a Blue Sky Communications*

Attachments

cc: Jim Ball (IB)
Imani Ellis-Cheek (IB)
David Krech (IB)
George Li (IB)

⁸ See SPIN Overview at 10.


⁹ See *id.*

CERTIFICATION OF FAY ALAILIMA-ROSE

I, Fay Alailima-Rose a employee of eLandia Group and a consultant to American Samoa Hawaii Cable, LLC (“ASHC”), and Pac-Rim Redeployment, LLC (“PRR”), hereby certify to the following:

- (1) I have personal knowledge of the factual representations provided in the January 5, 2009, response of ASHC, PRR, and AST Telecom, LLC (“Blue Sky”) (collectively, “Applicants”), with respect to the second question (pertaining to the status of the American Samoa Earth Stations) posed in the December 23, 2008 e-mail sent by FCC staff to the Applicants’ counsel. I assisted in preparing the Applicants’ response to this question.
- (2) The information provided in the above-noted response is true and accurate to the best of my knowledge.

I certify under penalty of perjury that the foregoing is true and correct. Executed on January 12, 2009.



Fay Alailima-Rose

CERTIFICATION OF JOHN HIBBARD

I, John Hibbard, Chief Executive Officer of Hibbard Consulting Pty. Ltd. and a consultant to American Samoa Hawaii Cable, LLC (“ASHC”), and Pac-Rim Redeployment, LLC (“PRR”), hereby certify to the following:

- (1) I have personal knowledge of the factual representations provided in the January 9, 2009, response of ASHC, PRR, and AST Telecom, LLC (“Blue Sky”) (collectively, “Applicants”), with respect to the second question (pertaining to the status of the South Pacific Island Network) posed in the December 23, 2008 e-mail sent by FCC staff to the Applicants’ counsel. I assisted in preparing the Applicants’ response to this question.
- (2) The information provided in the above-noted response is true and accurate to the best of my knowledge.

I certify under penalty of perjury that the foregoing is true and correct. Executed on January 9, 2009.



John Hibbard