

July 17, 2015

**VIA IBFS**

David Krech  
Associate Division Chief  
International Bureau Policy Division  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Jodi Cooper  
Attorney-Advisor  
International Bureau Policy Division  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

*RE: Response to Additional Questions Regarding SEA-US Cable Landing License  
Application, File No. SCL-LIC-20150626-00016*

Dear Mr. Krech and Ms. Cooper:

On July 16, 2015, the Federal Communications Commission requested additional information from Globe Telecom, Inc., GTI Corporation, Hawaiian Telcom Services Company, Inc., RAM Telecom International, Inc. (“RTI”), TeleGuam Holdings, LLC d/b/a GTA TeleGuam (“GTA”), PT Telekomunikasi Indonesia International, and Telekomunikasi Indonesia International (USA) Inc. (“Telkom USA”) (together, the “Applicants”) related to their application for a submarine cable landing license filed on June 26, 2015.<sup>1</sup> The Applicants provide a response to those follow-up questions below.

***1. Can you please provide us with a current organizational chart for GTA as well as organizational charts pre and post transaction?***

Please find attached a pre-transaction organizational chart for GTA and Telkom USA, as well as a post-transaction organizational chart. These charts also appear in the public record

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<sup>1</sup> File No. SCL-LIC-20150626-00016.

associated with the transfer-of-control application filed by GTA and Telkom USA on June 12, 2015.<sup>2</sup>

**2. Also, has construction begun on the cable system, and, if so, when?**

Installation has not yet begun on the SEA-US cable system, although manufacturing of the necessary equipment is already underway.

**3. Finally, Appendix D, RTI ownership information, is the remaining 8.5% ownership (fully diluted) held by individuals or entities from WTO Member countries?**

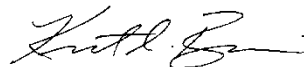
In Appendix D to the SEA-US application, RTI provided ownership information for its ten-percent-or-greater owners, as required by Sections 1.767(a)(8)(i) and 63.18(h) of the Commission's rules. The three owners that RTI disclosed in that document—all of whom are citizens of World Trade Organization ("WTO") member countries—own a combined total of 87.3 percent of RTI. The remaining 12.7 percent of RTI is also held by individuals or entities from WTO member countries, including Australia, Canada, Hong Kong, Japan, Singapore, and the United States.<sup>3</sup>

\* \* \*

Attached to this letter please find the signed declaration of Russell Matulich, RTI's Chief Executive Officer, certifying to the accuracy of the information provided in response to questions two and three. Because GTA and Telkom USA previously certified to the accuracy of the organizational charts filed with their transfer-of-control application, this information does not require the submission of an additional declaration.

Should you have any questions, please contact Danielle Piñeres by telephone at +1 202 730 1306 or by e-mail at [dpineres@hwglaw.com](mailto:dpineres@hwglaw.com).

Yours sincerely,



Kent Bressie  
Danielle Piñeres  
*Counsel for the Applicants*

Enclosures

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<sup>2</sup> File No. ITC-T/C-20150612-00146; WC Docket No. 15-148.

<sup>3</sup> See World Trade Organization, *Members and Observers* (as of April 26, 2015), [http://www.wto.org/english/thewto\\_e/whatis\\_e/tif\\_e/org6\\_e.htm](http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm).

**DECLARATION OF RUSSELL MATULICH**

I, Russell Matulich, Chief Executive Officer of RAM Telecom International, Inc., have reviewed the accompanying letter and declare under penalty of perjury under the laws of the United States of America that the information provided in response to questions two and three contained therein is true and correct. Executed on July 17, 2015.

A handwritten signature in cursive script, reading "Russell Matulich", written over a horizontal line.

Russell Matulich

## **EXHIBIT A**

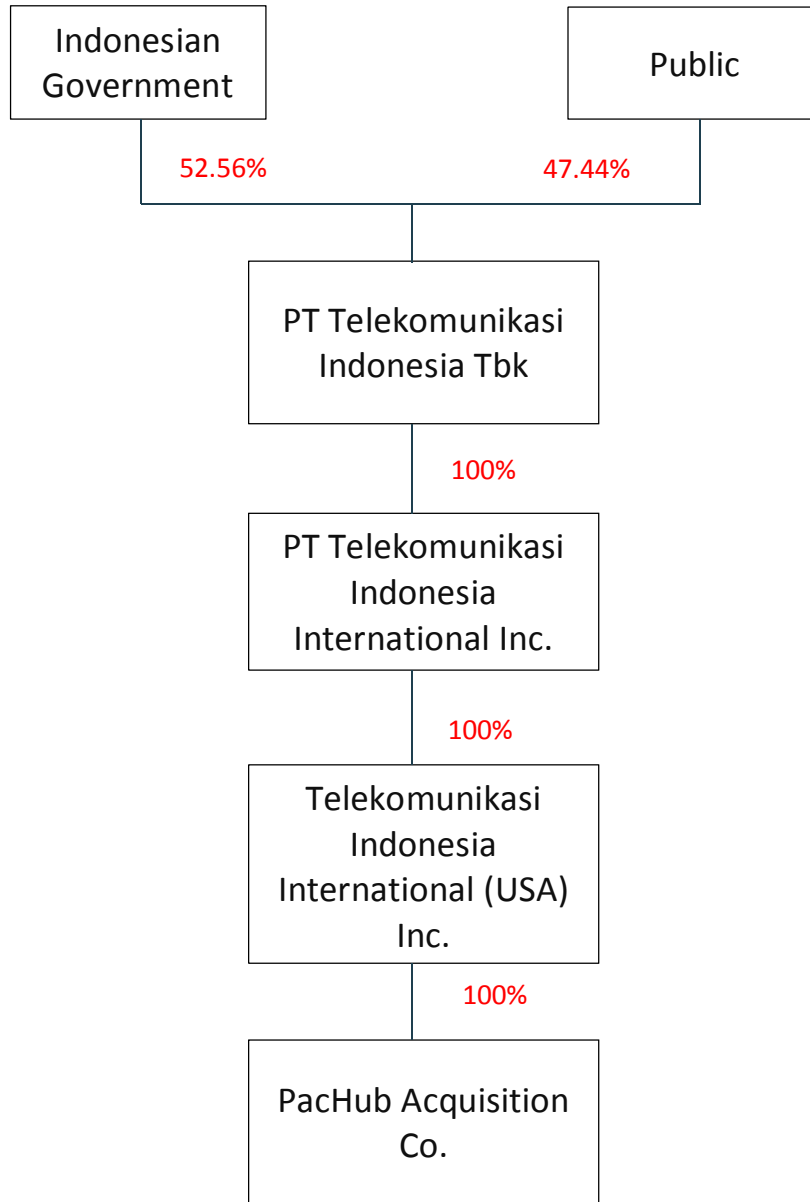
Diagram of the pre-transaction corporate structure of  
TeleGuam and AP TG



## **EXHIBIT B**

Diagram of the pre-transaction corporate structure of Telkom USA

Telkom Indonesia International (USA) Inc.  
Pre-Merger Ownership and Structure Chart\*



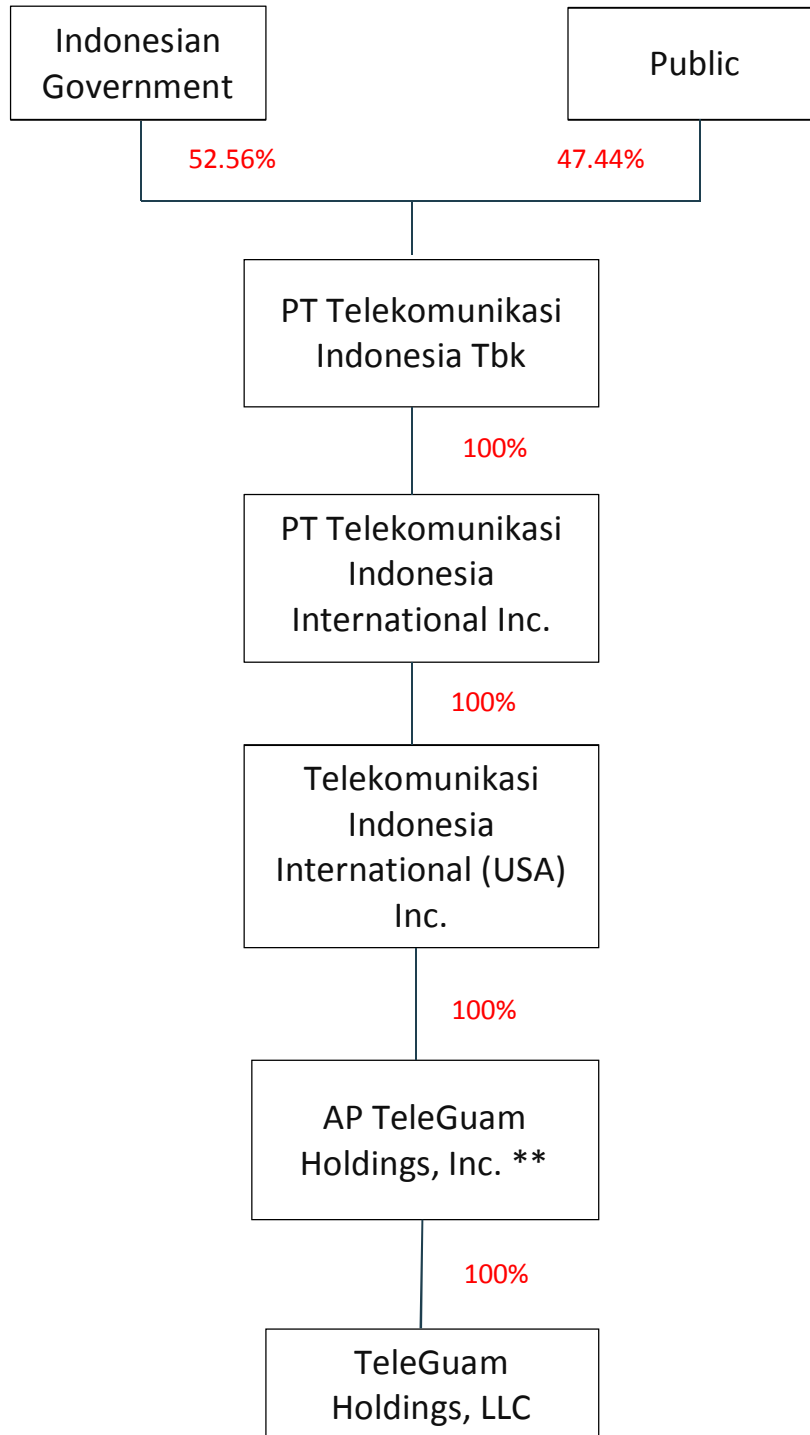
\* Note that these diagrams highlight the ownership chain of the entities impacted by the transaction; unaffected affiliate entities have been omitted to provide greater clarity of the transaction.

## **EXHIBIT C**

Diagram of the corporate structure of  
Telkom USA, AP TG and TeleGuam post-closing



Telkom Indonesia International (USA) Inc.  
Post-Merger Ownership and Structure Chart\*



\* Note that these diagrams highlight the ownership chain of the entities impacted by the transaction; unaffected affiliate entities have been omitted to provide greater clarity of the transaction.

\*\* AP TeleGuam Holdings will have merged with PacHub Acquisition with AP TeleGuam surviving the merger.