

12 January 2017

**BY ELECTRONIC MAIL**

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

*Re: Cable Landing License Application for the Southeast Asia-US Submarine Cable System, FCC File No. SCL-LIC-20150626-00016*

Dear Ms. Dortch:

On behalf of the owners of the Southeast Asia-US (“SEA-US”) submarine cable system, I hereby respond to a request from International Bureau staff seeking confirmation of ownership information submitted in the above-referenced file. GTI Corporation remains an indirect, wholly-owned subsidiary of Globe Telecom, Inc., the ownership of which has not changed in any material way since the cable landing license application was filed on June 26, 2015.<sup>1</sup> Hawaiian Telcom Services Company, Inc., remains an indirect, wholly-owned subsidiary of Hawaiian Telcom Holdco, Inc., the ownership of which has not changed significantly since June 26, 2015. Black Diamond Capital Management, L.L.C.’s interest in Hawaiian Telcom Holdco, Inc., has been reduced slightly to 23.1 percent,<sup>2</sup> while Twin Haven Capital Partners, L.L.C.’s interest in Hawaiian Telcom Holdco, Inc., has increased slightly, to 21.9 percent.<sup>3</sup> The

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<sup>1</sup> See, e.g., Globe Telecom, Inc., *Top 100 Common Shareholders* (as of Sept. 30, 2016) (Oct. 13, 2016), [http://investor-relations.globe.com.ph/content/dam/multi-microsites/docs/2016/GLO\\_Top-100\\_3Q16.pdf](http://investor-relations.globe.com.ph/content/dam/multi-microsites/docs/2016/GLO_Top-100_3Q16.pdf); Globe Telecom, Inc., *Top 100 Preferred Shareholders* (as of Sept. 30, 2016) (Oct. 13, 2016), [http://investor-relations.globe.com.ph/content/dam/multi-microsites/docs/2016/GLOPA\\_Top-100\\_3Q16.pdf](http://investor-relations.globe.com.ph/content/dam/multi-microsites/docs/2016/GLOPA_Top-100_3Q16.pdf).

<sup>2</sup> See, e.g., Hawaiian Telcom Holdco, Inc. SEC Schedule 13D (filed Feb. 25, 2016), <http://services.corporate-ir.net/SEC/Document.Service?id=P3VybD1hSF1wY0RvdkwYRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TURjM01UZ3pNU1p6ZFdkemFXUTIOVGM9JnR5cGU9MiZmbj1lYXdhZWlhblRlbGNvbUhhvGRjb0luYy5wZGY=>.

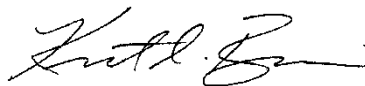
<sup>3</sup> See, e.g., Hawaiian Telcom Holdco, Inc. SEC Form 13-D (filed Mar. 14, 2016), [http://services.corporate-](http://services.corporate-ir.net/SEC/Document.Service?id=P3VybD1hSF1wY0RvdkwYRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TURjM01UZ3pNU1p6ZFdkemFXUTIOVGM9JnR5cGU9MiZmbj1lYXdhZWlhblRlbGNvbUhhvGRjb0luYy5wZGY=)

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respective ownership of RAM Telecom International, Inc. and TeleGuam Holdings, LLC d/b/a GTA has not changed in any material way since June 26, 2015.<sup>4</sup> Telekomunikasi Indonesia International (USA) Inc. remains a direct, wholly-owned, subsidiary of PT Telekomunikasi Indonesia International, the ownership of which has not changed in any material way since June 26, 2015.<sup>5</sup>

Should you require any additional information, please do not hesitate to contact me.

Respectfully submitted,



Kent Bressie

*Counsel for the SEA-US Owners*

cc: Jodi Cooper  
David Krech

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ir.net/SEC/Document.Service?id=P3VybD1hSFIwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFXOXVQVkJFUmlacGNHRm5aVDB4TURneE5EY3hOU1p6ZFdkemFXUTIOVGM9JnR5cGU9MiZmbj1lYXdhYWlhbIRlbGNvbUhhbGRjb0luYy5wZGY=.

<sup>4</sup> See, e.g., TeleGuam Holdings, LLC, Current FCC Form 602 Ownership Disclosure Filing, <http://wireless2.fcc.gov/ownerQryDetail/ownership-search-results-detail.htm?applId=8931562&editttype=R/O&OwnershipSearch=Y&reqPage=2>; (GTA – Corporate Profile – Ownership (last visited Jan. 11, 2017)).

<sup>5</sup> See, e.g., Telkom Indonesia, *Stock Info – Share Ownership* (as of Mar. 21, 2016), [www.telkom.co.id/en/hubungi-kami/pt-telekomunikasi-indonesia-tbk/investor-relations/laporan-tahunan/informasi-saham/kepemilikan-saham](http://www.telkom.co.id/en/hubungi-kami/pt-telekomunikasi-indonesia-tbk/investor-relations/laporan-tahunan/informasi-saham/kepemilikan-saham).