

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 New Cross Pacific Submarine Cable System, FCC File No. SCL-LIC-20151104-00029

Dear Ms. Dortch:

On behalf of the owners of the New Cross Pacific (“NCP”) submarine cable system, I hereby respond to a request from International Bureau staff seeking confirmation of ownership information submitted in the above-referenced file. Microsoft Infrastructure Group, LLC, and Microsoft Operations Pte Ltd remain wholly-owned subsidiaries of Microsoft Corporation, the ownership of which has not changed in any material way since the cable landing license application was filed on November 3, 2015.¹ China Mobile International Limited remains a wholly-owned subsidiary of China Mobile Limited, the ownership of which has not changed in any material way since the cable landing license application was filed on November 3, 2015.² The respective ownership details of China Telecommunications Corporation, China United Network Telecommunications Group Company Limited, and KT Corporation have not changed in any material way since the original application was filed on November 3, 2015.³ Chunghwa

¹ See, e.g., Microsoft Corporation, SEC Form 10-K (filed July 28, 2016), <https://apps.shareholder.com/sec/viewerContent.aspx?companyid=MSFT&docid=11509606>.

² See, e.g., China Mobile Limited, *Interim Report 2016*, at 41 (Aug. 11, 2016), www.chinamobileltd.com/en/ir/reports/ir2016.pdf; China Mobile Limited, *About China Mobile Limited – Corporate Governance – Shareholders*, <http://www.chinamobileltd.com/en/about/cg.php> (last visited Jan. 11, 2017).

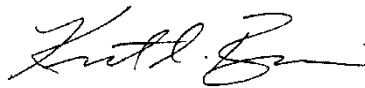
³ See, e.g., China Telecom Corporation Limited, SEC Form 20-F at 7 (filed Apr. 28, 2016), www.chinatelecom-h.com/en/ir/report/2015_20f.pdf; China Unicom (Hong Kong Limited), *Interim Report 2016*, at 16 (Aug. 17, 2016), <http://www.chinaunicom.com.hk/en/ir/reports/ir2016.pdf>; KT Corporation, SEC Form 20-F, at 91 (filed Apr. 29, 2016), <https://www.sec.gov/Archives/edgar/data/892450/000119312516566595/d157381d20f.htm>;

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Telecom Co., Ltd.'s ownership has not changed in any material way since the original application was filed on November 3, 2015.⁴

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

Respectfully submitted,



Kent Bressie

Counsel for the NCP Applicants

cc: Jodi Cooper
David Krech

KT Corporation, *Investor Relations – Stock Information – Shareholding Structure*,
www.kt.com/eng/ir/stocks_02.jsp (last visited Jan. 11, 2017).

⁴ See, e.g., Chunghwa Telecom Co., Ltd., SEC Form 20-F, at 101 (filed Apr. 27, 2016),
www.cht.com.tw/en/ir/upload/files/2015_20F_final.pdf; Chunghwa Telecom Co., Ltd.,
Investors FAQ, www.cht.com.tw/en/ir/faq.html (last visited Jan. 11, 2017).