



August 1, 2018

BY ELECTRONIC FILING

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

*Re: Cable Landing License Application for the JUPITER System,
FCC File No. SCL-LIC-20180517-00012*

Dear Ms. Dortch:

The applicants for a cable landing license for the JUPITER submarine cable system hereby respond to questions posed by Commission staff by e-mail on June 18, 2018.

1. Please provide information regarding the length of the Philippines Branch and the Oregon Branch

The Philippines Branch will have a total length of 3,505 kilometers. The Oregon Branch will have a total length of 740 kilometers.

2. Table 1 in Appendix A shows that NTT Com Asia Ltd. does not own/control a cable landing station, whereas Table 1 in Appendix B shows that NTT Com Asia Ltd. owns/controls a cable landing station. Please clarify this discrepancy.

The information in Appendix B is correct. NTT America, Inc., hereby corrects Table 1 in Appendix A to reflect that NTT Com Asia Ltd. owns/controls a cable landing station (that is unrelated to the JUPITER system).

3. Please provide the telephone numbers of Johanna Ravelo and Andrew Guhr, who are identified as points of contact in Section I.3 of Appendix C.

The phone number for Ms. Ravelo and Mr. Guhr is +1 650 543 4800.

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4. ***Please provide the citizenship information of Manuel V. Pangilinan, whom the application states has been appointed as proxy or duly authorized representative of BTF Holdings to represent and vote the PLDT shares of voting preferred stock of BTF Holdings in the annual meeting of PLDT (Appendix E).***

Mr. Pangilinan is a Philippines citizen.

5. ***Please clarify the state of incorporation of Amazon.com Services, Inc. and Amazon.com, Inc. (Appendix G).***

Each of these entities is a Delaware corporation.

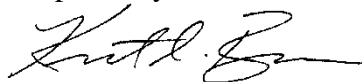
6. ***Please provide additional information regarding the ownership of HKT Global (Singapore) Pte. Ltd.***

Please see Attachment A to this letter.

* * * * *

Please contact me with any questions.

Respectfully submitted,



Kent Bressie

Attachment

cc: Denise Coca
Gabrielle Kim
David Krech

ATTACHMENT A

In response to follow-up questions from the Commission staff, HKT Global (Singapore) Pte. Ltd. (“HKTGS”) provides the following information to supplement Appendix D:

- Appendix D states that the “HKT Trust is not a legal entity.” HKTGS clarifies that trusts are not required to register with the government under Hong Kong law, thus the HKT Trust is not a registered legal entity. Given that the HKT Trust is not a legal entity, it cannot hold assets. Rather, its assets are held by a Trustee-Manager, which in this case is HKT Management Limited. The shares of the HKT Trust are “stapled” to the shares of HKT Limited, and listed on the Hong Kong Stock Exchange. In other words, the shares of the HKT Trust are contractually bound with those of HKT Limited such that the shares of the HKT Trust and HKT Limited cannot be bought or sold separately.
- HKTGS confirms that there are no other individuals or entities (except as disclosed in Appendix D) that hold a 10% or greater direct or indirect voting or equity ownership interest in HKTGS. This includes any other individuals or entities that may hold a direct or indirect ownership interest in OS Holdings Limited, PCCW Limited, Pacific Century Regional Developments Limited, the HKT Trust, or HKT Limited.
- The country of organization, address, and principal business for the Ocean Unit Trust, the Starlite Unit Trust, and Anglang Investments Limited are as follows:

Name: Ocean Unit Trust

Address: Richmond House, 12 Par-la-Ville Road, Hamilton, HM08, Bermuda

Place of organization/formation: Bermuda

Principal Business: Trust

Relationship: The Ocean Unit Trust is a trust constituted under the laws of Bermuda and holds no voting or equity interests of Pacific Century Group Holdings

Name: Starlite Unit Trust

Address: Richmond House, 12 Par-la-Ville Road, Hamilton, HM08, Bermuda

Place of organization/formation: Bermuda

Principal Business: Trust

Relationship: The Starlite Unit Trust is a trust constituted under the laws of Bermuda and holds no voting or equity interests of Pacific Century Group Holdings

Name: Anglang Investments Limited

Address: P.O. Box 957, Offshore Incorporations Centre, Road Town, Tortola, British Virgin Islands

Place of organization/formation: British Virgin Islands

Principal Business: Investment holding

Relationship: Anglang Investments Limited holds an approximate 44.12% equity and voting interest in Pacific Century Regional Developments Limited

- HKTGS confirms that there are no corporate officers and directors of HKTGS that are also officers or directors of foreign carriers.