

April 24, 2019

**VIA ELECTRONIC FILING**

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

*Re: Application for Cable Landing License for the JGA North System, File No.  
SCL-LIC-20181106-00035*

Dear Ms. Dortch:

Through their counsel, RTI Solutions, Inc. (“RTI Solutions”), RTI JGA Pte. Ltd. (“RTI JGA”), and RTI Connectivity Pte. Ltd. (“RTI Connectivity”) (collectively, “Applicants”) supplement the above-referenced application for the JGA North system that will connect Guam and Japan (the “Application”). This supplement updates the disclosures set forth in paragraph G of the Application with respect to the ownership of the Guam landing station.

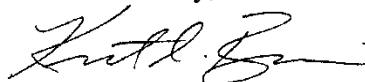
As stated in the Application, RTI Solutions will serve as the U.S. landing party and will control the Piti, Guam, landing arrangements under a contract with the cable landing station owner, Gateway Network Connections, Inc. (“GNC”). Initially a Guam corporation, GNC is in the process of being converted into a limited liability company. Also as stated in the Application, TeleGuam Holdings, LLC, will own 49 percent of GNC. As Guam cable landing station development has progressed, however, the RTI Group has decided to structure its ownership of that facility in a different manner. Consequently, GNC’s 51-percent owner will no longer be Asia Connectivity Elements Pte. Ltd., a Singapore entity (which is to be dissolved). Instead, GNC’s 51-percent owner will be Asia Connectivity Elements, Inc. (“ACE”), a newly-formed Guam corporation. Mr. Russell Matulich, a U.S. citizen, holds a direct, 100-percent voting and economic interest in ACE.

The above-identified change does not affect the ownership structure of Applicants or RTI Solutions’ ability to control the Guam cable landing station facilities, and accordingly should have no material impact on the Commission’s review of the pending Application.

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Should you have any questions regarding the information provided above, please contact Kent Bressie by telephone at +1 202 730 1337 or by e-mail at kbressie@hwglaw.com.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Kent Bressie".

Kent Bressie  
Colleen Sechrest

*Counsel to RTI Solutions, Inc., RTI JGA Pte. Ltd.,  
and RTI Connectivity Pte. Ltd.*

cc: David Krech  
Jodi Cooper