

September 12, 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” or “RTI Group”) 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 updated in RTI Group’s supplement of April 24, 2019 (“Supplement”).

As stated in the Application and Supplement, 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, LLC (“GNC”). TeleGuam Holdings, LLC, holds a 49-percent voting and economic interest in GNC. GNC’s 51-percent owner is Asia Connectivity Elements, Inc. (“ACE”), a newly-formed Guam corporation, previously owned 100-percent by Mr. Russell Matulich, a U.S. citizen and RTI Group’s Chief Executive Officer.

As Applicants advised the Commission in the Supplement, ACE has made further distributions of shares to both RTI Group management and other investors. Based on these distributions, RTI Group executives collectively hold a controlling 51-percent interest in ACE. Specifically, Mr. Russell Matulich now holds a 23.68-percent interest directly and through his wholly-owned corporation, Making Chaos Global, LLC. RTI Group’s President, Brett Lay, holds a 17-percent interest, and RTI Group’s Chief Financial Officer, Brian Mass, holds a 10.32-

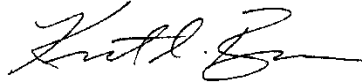
Ms. Marlene H. Dortch
Federal Communications Commission
September 12, 2019
Page 2 of 2

percent interest. Only one other investor, 360 CDIP Guam Pty Ltd, holds an interest above 5-percent in ACE. Specifically, 360 CDIP Guam Pty Ltd, an Australian entity, holds a 36.33-percent interest in ACE.

The above-identified changes in ownership of the Guam landing station does not affect the ownership structure of the Applicants, nor RTI Solutions' ability to control the Guam cable landing station, and accordingly should have no material impact on the Commission's review of the pending Application.

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,



Kent Bressie
Colleen Sechrest

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

cc: David Krech
Jodi Cooper