

December 31, 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 South System, File No.  
SCL-LIC-20190502-00016*

Dear Ms. Dortch:

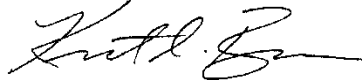
Through their counsel, RTI Solutions, Inc., RTI JGA Pte. Ltd. (“RTI JGA”), and RTI Connectivity Pte. Ltd. (collectively, “RTI Applicants”) supplement the above-referenced application for the JGA South system that will connect Guam and Australia (the “Application”). This supplement updates RTI JGA’s ownership disclosures in Appendix C to reflect that Tan Boon Aun Rudy no longer holds an interest in STC Group Ltd., the parent company of Ocorian Singapore Trust Company Pte. Ltd. (which has updated its name from Singapore Trust Company Pte. Ltd.), Trustee of the RTI JGA Share Trust. Ocorian Limited’s interest has correspondingly increased from 80 percent to 100 percent. This change is illustrated on the enclosed updated Attachment 1 to Appendix C. The updated Attachment 1 also depicts the trustee role of Ocorian Singapore Trust Company Pte Ltd.

The above-identified ownership changes do not affect substantively the ownership structure of the RTI Applicants, 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,



Kent Bressie  
Colleen Sechrest

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

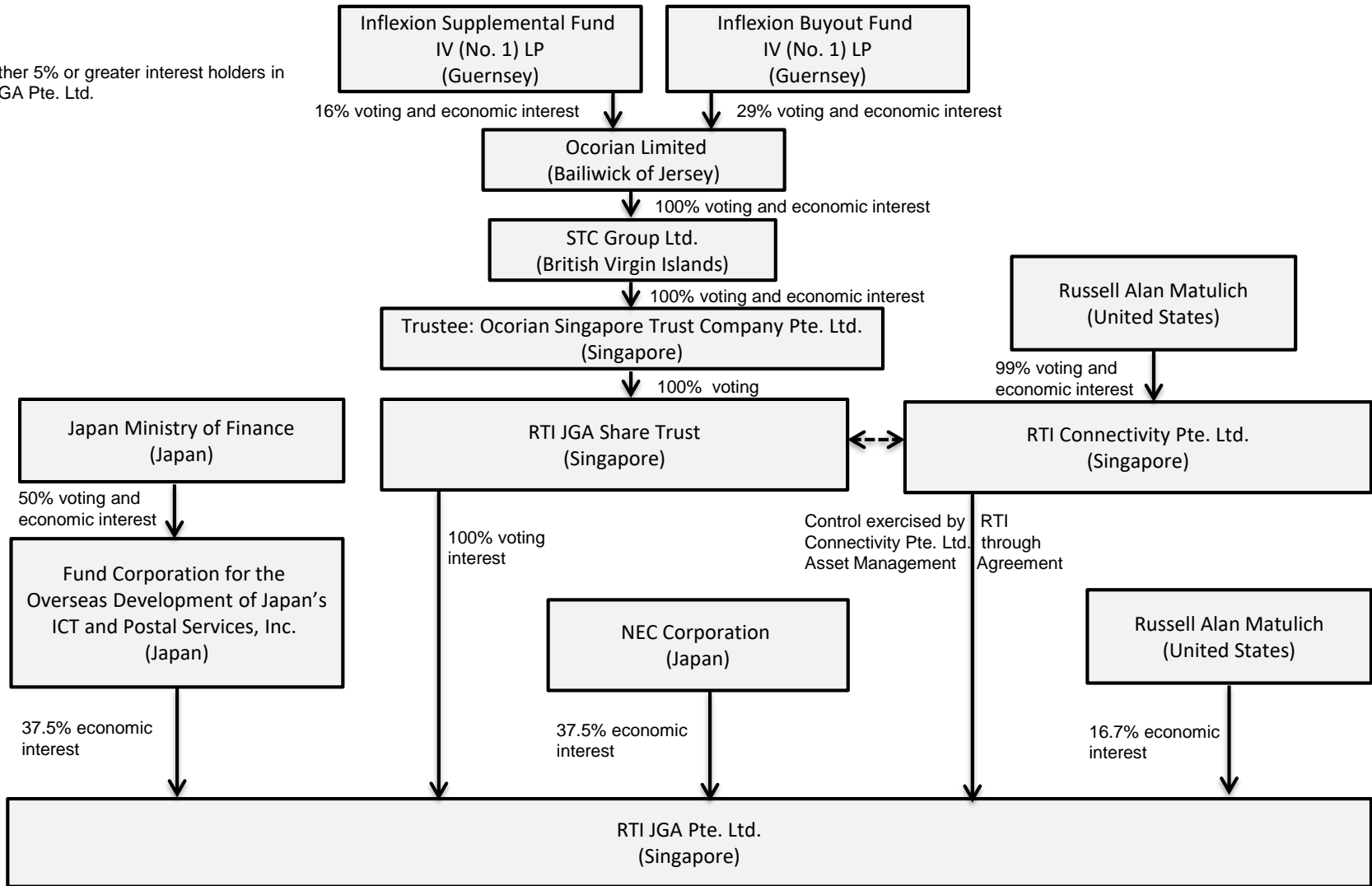
Attachment

cc: David Krech  
Jodi Cooper

**Appendix C**  
**Attachment 1**

**RTI JGA Pte. Ltd. Ownership Structure**

No other 5% or greater interest holders in RTI JGA Pte. Ltd.



↔ Asset Management Agreement