

December 19, 2019

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ATTORNEYS AT LAW

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 Hong Kong-Guam Cable System,
File No. SCL-LIC-20191122-00037*

Dear Ms. Dortch:

Through their counsel, RTI Solutions, Inc. (“RTI Solutions”), RTI HK-G Pte. Ltd. (“RTI HK-G”), and RTI Connectivity Pte. Ltd. (“RTI Connectivity”) (collectively, “RTI Applicants” or “RTI Group”) supplement the above-referenced application for the Hong Kong-Guam (“HK-G”) system that will connect Hong Kong and Guam (the “Application”). This supplement clarifies the information presented in the Application, as follows:

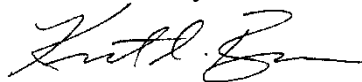
First, the RTI Applicants update Appendix A to confirm that RTI Solutions is a California corporation with a principal place of business in California.

Second, the RTI Applicants update Appendix B to clarify that RTI HK-G has a 100-percent ownership interest in Fiber Pairs 2 through 4 (rather than Segments).

Third, the RTI Applicants update Appendix B to confirm the name of the Trustee for the RTI HK-G Share Trust: Ocorian Singapore Trust Company Pte Ltd. The Trustee’s role is reflected on the enclosed, updated Attachment 1 to Appendix B.

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 HK-G Pte.
Ltd., and RTI Connectivity Pte. Ltd.*

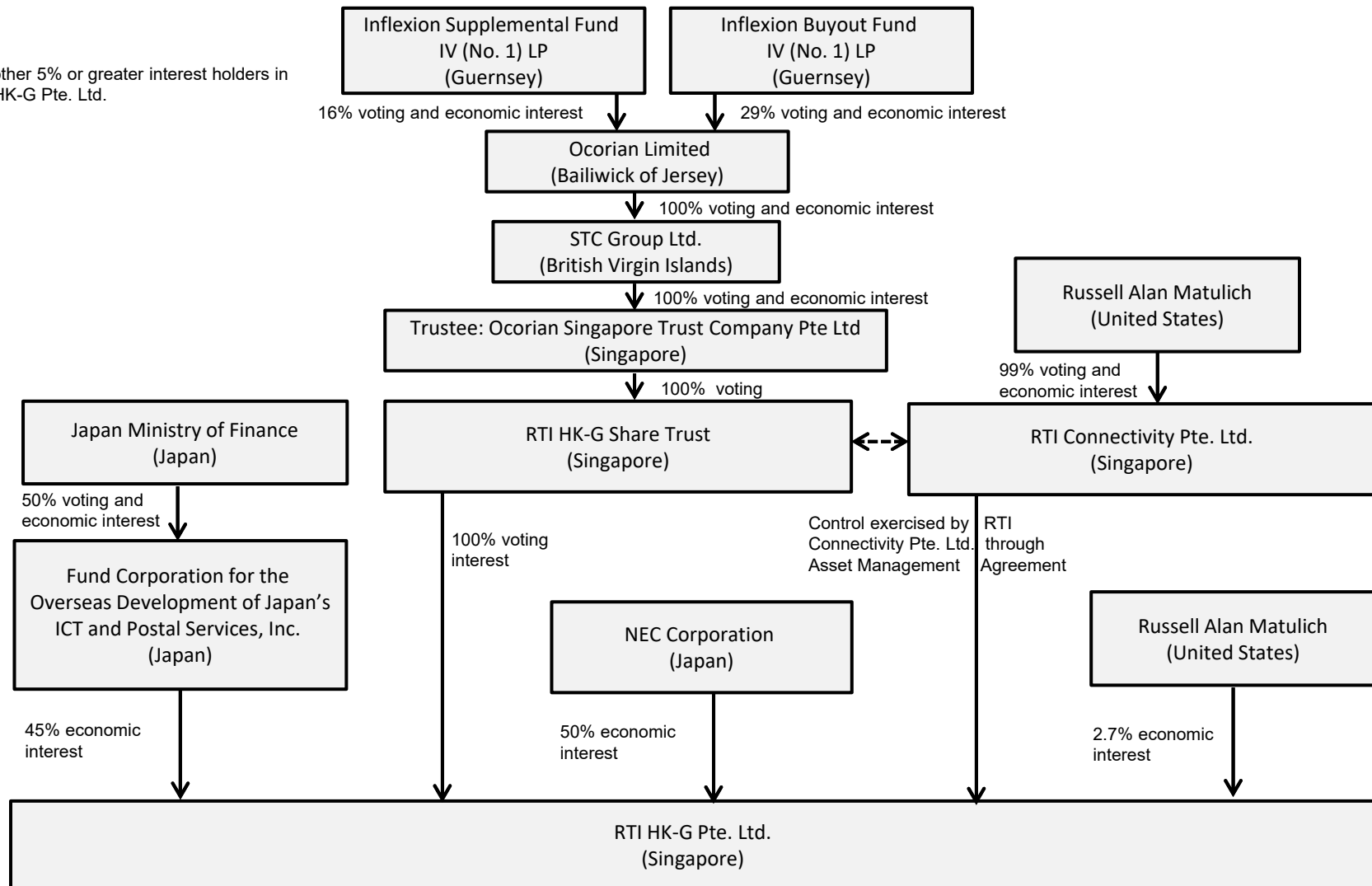
Attachment

cc: David Krech
Jodi Cooper

Attachment 1

RTI HK-G Pte. Ltd. Ownership Structure

No other 5% or greater interest holders in RTI HK-G Pte. Ltd.



↔ Asset Management Agreement