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15 March 2005

RECEIVED

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Federal Communications Commission
Office of Secretary

**BY ELECTRONIC MAIL
AND HAND DELIVERY**

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

Re: Tyco Telecommunications (US) Inc. et al., Application for Assignment of a Cable Landing License for the Tyco Atlantic Submarine Cable System and of a Jointly-Held Cable Landing License for the Tyco Pacific Submarine Cable System, and Tyco International Ltd. et al., Application for Transfer of Control of a Jointly-Held Cable Landing License for the Tyco Pacific Submarine Cable System

Dear Ms. Dortch:

International Bureau staff have confirmed that Tyco Telecommunications (US) Inc. ("Tyco Telecom") may require authority under the Cable Landing License Act in order to retain ownership of the stub of the unbuilt southern segment of the Tyco Pacific submarine cable system ("Tyco Pacific") following the consummation of the transactions described in the above-referenced application.¹ Consequently, International Bureau staff have indicated their intention to issue a separate file number for the unbuilt southern segment of Tyco Pacific, including the cable stub.

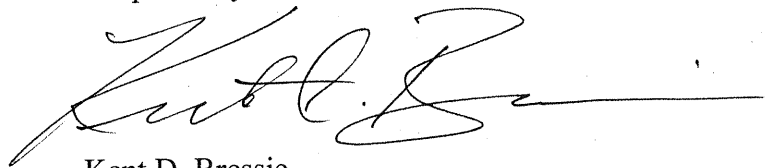
¹ See Tyco Telecommunications (US) Inc. et al., Application for Assignment of a Cable Landing License for the Tyco Atlantic Submarine Cable System and of a Jointly-Held Cable Landing License for the Tyco Pacific Submarine Cable System, and Tyco International Ltd. et al., Application for Transfer of Control of a Jointly-Held Cable Landing License for the Tyco Pacific Submarine Cable System, at 9 n.13 (filed March 4, 2005).

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To address the International Bureau's preferred course of action, Tyco Telecom and Tyco Networks (Guam) L.L.C. ("Tyco Guam") hereby amend the above-referenced application in two respects. *First*, Tyco Telecom and Tyco Guam request that the Commission treat Tyco Telecom's request for any necessary residual authority to own the cable stub as a license modification request, to be considered simultaneously with the applicants' request for Commission consent to consummate the transactions described in the application. *Second*, Tyco Telecom and Tyco Guam amend the application to state that prior to the closing of the transactions described in the application, Tyco Guam will assign to Tyco Telecom its entire ownership interest in the unbuilt southern segment of Tyco Pacific—including any new cable landing license issued for the unbuilt southern segment of Tyco Pacific. Thus, at the time of closing, Tyco Guam will have no interest in the unbuilt southern segment of Tyco Pacific, the cable stub, or any separate cable landing license issued for that unbuilt segment and cable stub.

If you have any questions, please do not hesitate to contact me by telephone at +1 202 730 1337 or by email at kbressie@harriswiltshire.com.

Respectfully submitted,



Kent D. Bressie

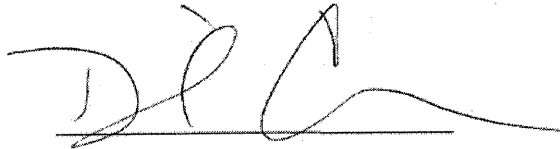
*Counsel for Tyco Telecommunications (US) Inc.
and Tyco Networks (Guam) L.L.C.*

Attachment

cc: Jim Ball
Kate Collins
Susan O'Connell

CERTIFICATION

I, David R. Coughlan, President of Tyco Telecommunications (US) Inc. ("Tyco Telecom") and Manager of Tyco Networks (Guam) L.L.C. ("Tyco Guam"), hereby certify that Tyco Telecom and Tyco Guam seek to amend the application to to assign and transfer the cable landing licenses for the Tyco Atlantic and Tyco Pacific submarine cable systems in the manner described in the attached letter.

A handwritten signature in black ink, appearing to read 'DRC', is written over a horizontal line.

David R. Coughlan

President, Tyco Telecommunications (US) Inc.
Manager, Tyco Networks (Guam) L.L.C.

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