



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

Stamp and Return

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SEP 19 2008

Federal Communications Commission
Office of the Secretary

Nancy J. Victory
202.719.7344
nvictory@wileyrein.com

September 19, 2008

VIA HAND DELIVERY

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

Re: Application to Modify the Trans-Pacific Express Cable Network, File No. SCL-MOD-20080714-00012; Supplemental Information

Dear Ms. Dortch:

The Trans-Pacific Express Cable Network (“TPE”) Consortium, by counsel, hereby supplements the above-referenced modification application. This application was submitted to modify the TPE cable network to add NTT Communications Corporation (“NTT Com”) as a licensee on the TPE cable and to extend the TPE cable to add a landing station in Shinmaruyama, Japan. As evidenced by the information provided below, this modification application qualifies for streamlined processing pursuant to Section 1.767(k) of the Commission’s rules, 47 C.F.R. § 1.767(k), because all of NTT Com’s affiliated foreign carriers lack market power in their respective markets.

As reported in the modification application, NTT Com is a foreign carrier in Japan, which is a member of the WTO, and NTT Com agrees to accept and abide by the reporting requirements contained in Section 1.767(l) of the Commission’s rules, 47 C.F.R. § 1.767(l).

Additionally, all of NTT Com’s affiliated foreign carriers, that operate in China, Taiwan, and Korea, lack market power in the international transport and the local access markets in those countries.

- NTT Com Asia Ltd. provides a range of data services in China. This entity has less than fifty percent market share in the international transport and the local access markets in China.
- NTT Com Asia Network Systems (Guangzhou) Company Limited provides consultation services in China regarding the building of a data network. This entity has no facilities and has less than fifty percent



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market share in the international transport and the local access markets in China.

- HKNet Company Ltd. provides ISP service in China. This entity has less than fifty percent market share in the international transport and the local access markets in China.
- HKNet Wireless Co. Ltd. does not provide telecommunications service in China. As such, the company has no telecommunications facilities, and has less than fifty percent market share in the international transport and the local access markets in China.
- NTT Taiwan Ltd. provides a range of data services in Taiwan. This entity has less than fifty percent market share in the international transport and the local access markets in Taiwan.
- NTT Korea Co., Ltd. provides a range of data services in Korea. This entity has less than fifty percent market share in the international transport and the local access markets in Korea.

Thus, pursuant to Section 1.767(k)(2) and (3) of the Commission's rules, 47 C.F.R. § 1.767(k)(2) and (3), the above-referenced modification application qualifies for streamlined processing.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,


Nancy J. Victory