



WILTSHIRE  
& GRANNIS LLP

1200 18TH STREET, N.W., STE. 1200  
WASHINGTON, D.C. 20036-2516  
U.S.A.

TEL +1 202 730 1337  
FAX +1 202 730 1301  
WWW.WILTSHIREGRANNIS.COM

ATTORNEYS AT LAW

25 January 2010

**BY ELECTRONIC FILING**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

*Re: Surrender of Interest in American Samoa-Hawaii Cable System, FCC File No. SCL-LIC-20080814-00016*

Dear Ms. Dortch:

By this letter, Pac-Rim Redeployment, LLC (“PRR,” FRN 0017882309) surrenders its interest in the cable landing license for the American Samoa-Hawaii Cable System (“ASHC System”). PRR, American Samoa Hawaii Cable, LLC (“ASHC”), and AST Telecom, LLC d/b/a Blue Sky Communications (“Blue Sky”) are licensed to land and operate the ASHC System, a non-common carrier fiber-optic submarine cable network connecting Keawaula, Hawaii, Iliili, American Samoa, and Apia, the Independent State of Samoa (“Samoa”).<sup>1</sup>

PRR has submitted this surrender notice in paper form, as IBFS will not permit electronic filing with respect to a partial surrender of a cable landing license. ***Please note that ASHC and Blue Sky are not surrendering their interests in the cable landing license for the ASHC system.***

---

<sup>1</sup> File No. SCL-LIC-20080814-00016. See Public Notice, *Actions Taken Under Cable Landing License Act*, Report No. SCL-00080, DA 09-45 (Jan. 16, 2009) (“ASHC Cable Landing License”). Concurrently with this surrender and modification filing, ASHC and its affiliates have filed with the Commission (1) an application for consent to the substantive transfer-of-control of the cable landing license for the ASHC System resulting from the recapitalization of its indirect parent, eLandia International, Inc., in February 2009, (2) an application for consent to the substantive transfer-of-control of the international Section 214 authorizations of AST Telecom, LLC, and eLandia Technologies, Inc., resulting from the recapitalization of its indirect parent, eLandia International, Inc., in February 2009, and (3) a notice of *pro forma* partial assignment notice with respect to ownership of the Samoa-American Samoa segment of the ASHC System.

Pursuant to Section 1.767(m)(2) of the Commission's rules,<sup>2</sup> PRR requests that the Commission modify the cable landing license for the ASHC System, File No. SCL-LIC-20080814-00016, by removing PRR as a joint licensee. The grant of the Cable Landing License to PRR, ASHC, and Blue Sky contemplated that PRR would transfer its interests in the ASHC System upon commissioning of the submarine cable. The Commission's grant of the ASHC Cable Landing License provides, in relevant part:

PRR will construct and initially own the wet link portion of the ASHC System, including the Hawaii, American Samoa, and the Samoa shore-end portions of the system. Upon commissioning, pursuant to a Purchase Agreement, ASHC will acquire the ASHC System. ASHC will operate the wet-link portion of the ASHC System, including the Hawaii-American Samoa and American Samoa-Samoa segments, as well as the Hawaii, American Samoa, and Samoa shore-end portions of the ASHC System.

The ASHC System has been commissioned and, on June 4, 2009, PRR transferred to ASHC the deployed Hawaii-American Samoa segment of the ASHC System, including the Hawaii and American Samoa shore-end portions of the ASHC System.<sup>3</sup> PRR transferred to Samoa American Samoa Cable, LLC, a wholly-owned subsidiary of ASHC, the Samoa-American Samoa segment.<sup>4</sup>

Pursuant to Section 1.767(m)(2) of the Commission's rules, PRR requests that the Commission modify the ASHC System Cable Landing License to delete PRR as a licensee. PRR is not required, pursuant to Section 1.767(h),<sup>5</sup> to remain a licensee because it (1) no longer owns or controls a cable landing station in the United States and (2) no longer owns any interest in the ASHC System. ASHC (and ASHC's wholly-owned subsidiary Samoa American Samoa Cable, LLC) and Blue Sky retain collectively *de jure* and *de facto* control of the U.S. portion of the cable system as contemplated in the Commission's grant of the cable landing license for the ASHC System.<sup>6</sup>

---

<sup>2</sup> 47 C.F.R. § 1.767(m)(2).

<sup>3</sup> Blue Sky owns and operates the Iiili cable station in American Samoa.

<sup>4</sup> SamoaTel Limited owns and operates the Apia cable station in Samoa.

<sup>5</sup> 47 C.F.R. § 1.767(h).

<sup>6</sup> PRR, ASHC, and Blue Sky are each controlled by eLandia International, Inc. PRR is a wholly-owned indirect subsidiary of eLandia International, Inc. ("eLandia International"). Blue Sky is a wholly-owned direct subsidiary of eLandia International. ASHC is majority-owned by eLandia International.

Ms. Marlene Dortch

25 January 2010

Page 3

Should you have any questions, please contact Kent Bressie at +1 202 730 1337 or kbressie@wiltshiregrannis.com.

Respectfully submitted,



Kent D. Bressie

Jonathan B. Mirsky

*Counsel to Pac-Rim Redeployment, LLC,  
American Samoa Hawaii Cable, LLC, and  
AST Telecom, LLC d/b/a Blue Sky Communications*