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November 9, 2009

Via ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Notification of Pro Forma Transfer of Control of Cable Landing License
(SCL-LIC-19990301-00005)¹

Dear Ms. Dortch:

In accordance with Section 1.767(g)(7) of the Commission's Rules, 47 C.F.R. § 1.767(g)(7), Reliance Globalcom Limited ("Reliance Globalcom")² hereby notifies the Commission of a pro forma transfer of control arising from a series of transactions involving the transfer of ownership interests from an entity controlling Reliance Globalcom to other corporate affiliates of Reliance Globalcom.

In a series of transactions that took place on October 10, 2009, and October 31, 2009, respectively, AAA Communications Private Limited ("AAACPL"), an indirect owner of Reliance Globalcom, reduced its shareholding interest in Reliance Communications Limited ("RCOM"), an intermediate direct parent of Reliance Globalcom, such that AAACPL's interest in RCOM and, by extension, in Reliance Globalcom, decreased from 54.16% to approximately 39.15%.³ The aggregate 15% interest transferred by AAACPL went to two corporate affiliates, ADA Enterprises and Ventures Private Limited ("ADAEVPL") and AAA Industries Private

¹ In April 2004 the Commission approved an application to modify this license to include the pro forma condition in 47 C.F.R. § 1.767(g)(7) as an amendment to paragraph (5) of the license. See IBFS File No. SCL-MOD-20040211-00005.

² Reliance Globalcom was formerly known as FLAG Telecom Group Limited, and notified the Commission of its name change by a letter filed April 3, 2008.

³ See Exhibit 1 for a diagram depicting the corporate structure prior to the pro forma transactions.

Limited (“AAAIPL”), each of which received an additional aggregate interest of 7.50%, and thereby increased each of their ownership interests in RCOM and, by extension, in Reliance Globalcom, from 4.61% to 12.11%.⁴

This change in ownership interests, which results in AAACPL going from holding a greater than 50% interest to holding a less than 50% (but still controlling) interest in the licensee, does not change the ultimate ownership or control of the international submarine cable landing license held by Reliance Globalcom. RCOM continues to be the ultimate corporate parent of Reliance Globalcom, and RCOM, in turn, continues to be majority-owned and controlled by Mr. Anil Ambani.

As the foregoing transactions (1) resulted in no actual change in control over Reliance Globalcom; (2) resulted in no change in the entities contained in the corporate structure above Reliance Globalcom; and (3) merely resulted in an indirect owner of the licensee going from holding a greater than 50% interest to holding a less than 50% (but still controlling) interest in the licensee, they were pro forma as defined in Section 63.24 of the Commission’s Rules. 47 C.F.R. § 63.24 (d) (“Transfers of control or assignments that do not result in a change in the actual controlling party are considered non-substantial or pro forma.”); *see also id.*, Note 2 to Paragraph (d) (“Assignment or transfer from a corporation to a wholly owned direct or indirect subsidiary thereof, or vice versa” and “Corporate reorganization that involves no substantial change in the beneficial ownership of the corporation” are presumptively pro forma).

Reliance Globalcom further certifies, as required by Rule 1.767(g)(7), that this pro forma transaction taken together with all previous pro forma transaction does not result in a change in the licensee’s ultimate control. *See* 47 C.F.R. § 1.767(g)(7).

If you have any questions regarding this notification, please contact the undersigned.

Respectfully submitted,

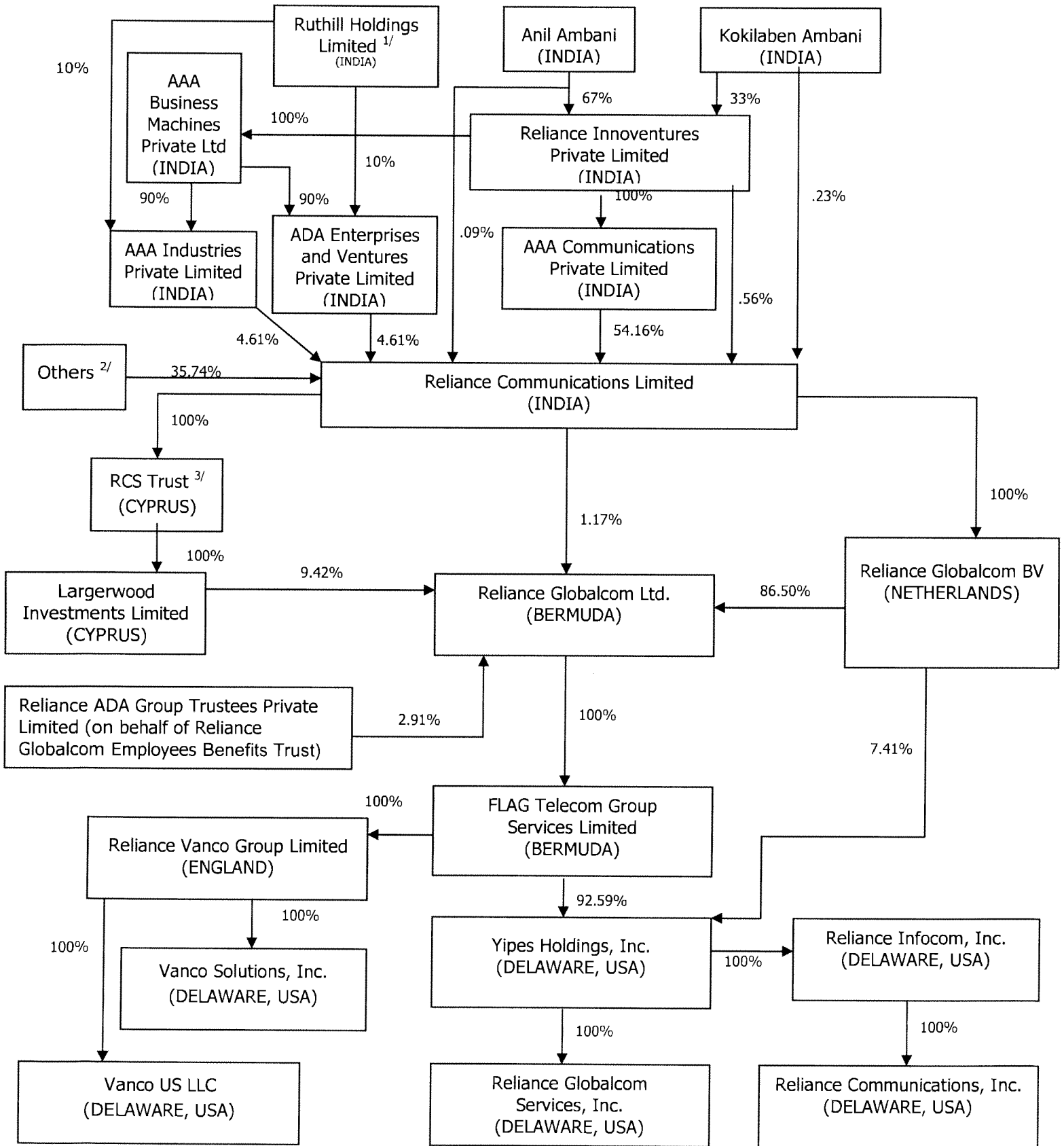
/s/

Christopher C. Tai
Rhonda M. Bolton

Counsel for Reliance Globalcom Limited

⁴ *See* Exhibit 2 for a diagram depicting the corporate structure after the pro forma transactions.

Exhibit 1
Reliance Corporate Structure Before October 10, 2009

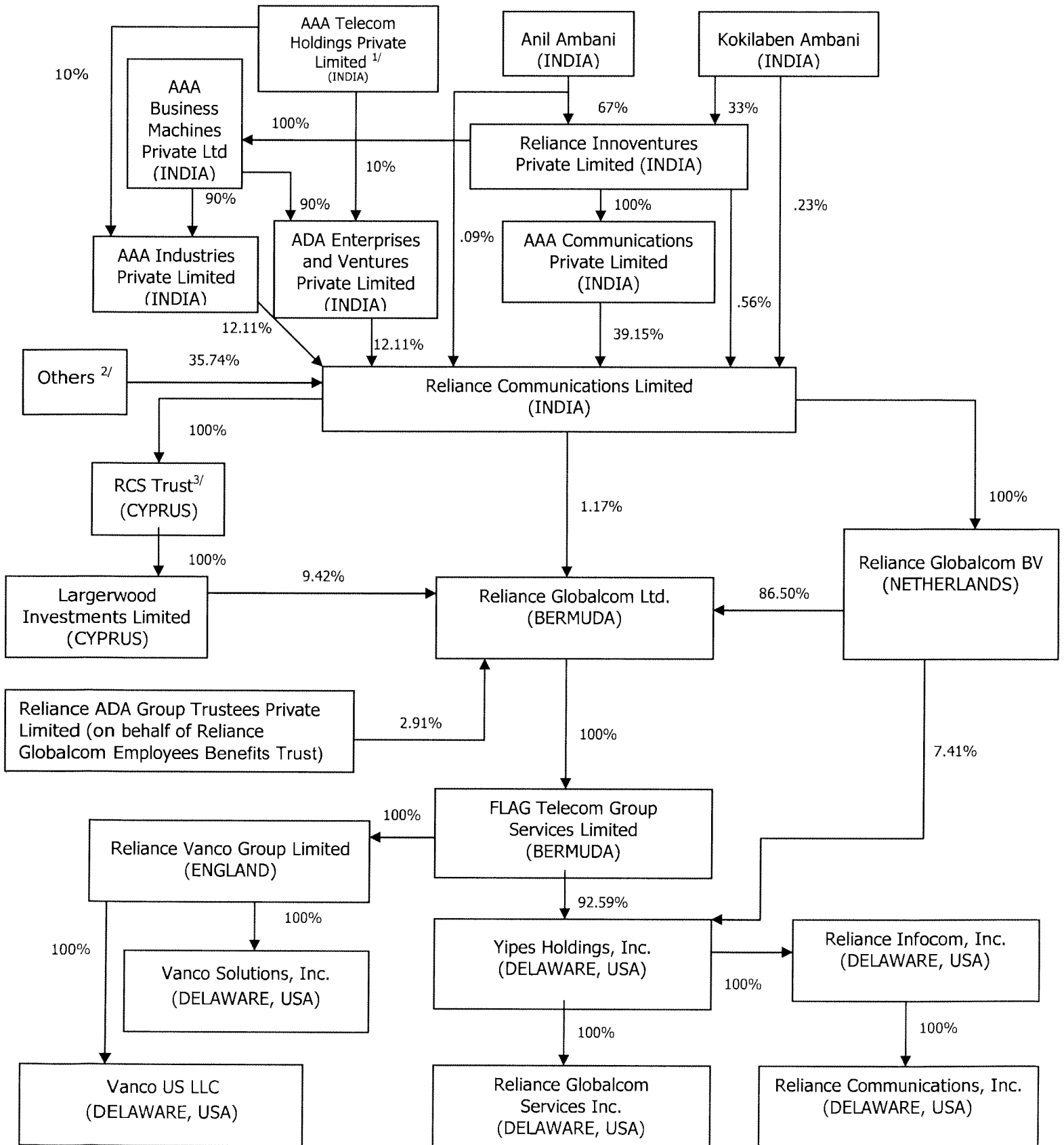


1/ This entity subsequently changed its name to AAA Telecom Holdings Private Limited.

2/ Consists of millions of shareholders, the vast majority of which individually holds a less than 1% interest in RCOM.

3/ The 100% economic interest of the RCS Trust will remain with Reliance/Reliance Subsidiaries.

Exhibit 2
Reliance Corporate Structure After October 31, 2009



^{1/} Previously known as Ruthill Holdings Limited.

^{2/} Consists of millions of shareholders, the vast majority of which individually holds a less than 1% interest in RCOM.

^{3/} The 100% economic interest of the RCS Trust will remain with Reliance/Reliance Subsidiaries.