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February 13, 2015

**By IBFS**

Ms. Jodi Cooper  
International Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Transfer of Control of Application of Pacnet International Limited, Pacnet Limited, Pacnet Services (USA) Inc., Telstra Holdings Pty Limited and Bedrock Holdings (Bermuda) Limited for a Transfer of Control of a Submarine Cable Landing License, SCL-T/C-20150202-00004  
**Supplemental Ownership Information**

Dear Ms. Cooper:

On February 2, 2015, an application was filed with the Federal Communications Commission ("FCC") requesting consent to the transfer of control that will occur as a result of a merger transaction ("Merger Transaction") involving Pacnet International Limited, Pacnet Limited, Pacnet Services (USA) Inc., Telstra Holdings Pty Limited ("Telstra Holdings") and Bedrock Holdings (Bermuda) Limited ("Bedrock Holdings") ("Telstra Holdings" with "Bedrock Holdings", the "Telstra Applicants"). Pacnet Services holds a submarine cable landing license on the Unity Cable System.

In response to your e-mail request made on February 11, 2015, the Telstra Applicants provide additional information, pursuant to section 1.767(a)(11)(i) of the FCC's rules, 47 C.F.R. § 1.767(a)(11)(i), regarding the percentage of voting and ownership interests held by the three entities that hold ten percent or more of the stock of Telstra Corporation Limited ("Telstra Corp."). Telstra Corp. is the direct parent of Telstra Holdings and indirect parent of Bedrock Holdings.

Telstra Corp. is a company formed under the laws of Australia with registered offices at Level 25, 242 Exhibition Street, Melbourne in Victoria, Australia 3000. Telstra Corp.

**KELLEY DRYE & WARREN LLP**

Ms. Jodi Cooper  
February 13, 2015  
Page 2

is a publicly traded company and, as such, its ownership is widely held. The following three entities hold 10 percent or more of the outstanding stock of Telstra Corp. The percentage of voting and ownership interests held by each entity is included below.

1. HSBC Custody Nominees (Australia) Limited  
Address: HSBC Centre  
Level 32, 580 George Street  
Sydney, NSW 2000  
Citizenship: Australia  
Principal business: Asset management company  
Percent Ownership Interest: 15.48%  
Percent Voting Interest: 15.48%
2. J.P. Morgan Nominees Australia Ltd.  
Address: Level 26, Grosvenor Place  
225 George Street  
Sydney, NSW 2000  
Citizenship: Australia  
Principal business: Asset management company  
Percent Ownership Interest: 12.26%  
Percent Voting Interest: 12.26%
3. National Nominees Limited  
Address: Level 12, 500 Bourke Street  
Melbourne, VIC 3000  
Citizenship: Australia  
Principal business: Asset management company  
Percent Ownership Interest: 11.96%  
Percent Voting Interest: 11.96%

Should you have any questions regarding this filing please direct them to the undersigned at (202) 342-8400.

KELLEY DRYE & WARREN LLP

Ms. Jodi Cooper  
February 13, 2015  
Page 3

Respectfully submitted,



John Heitmann.  
Denise N. Smith

*Counsel to Telstra Corporation Limited, Telstra  
Holdings Pty Limited and Bedrock Holdings  
(Bermuda) Limited*

cc: Jodi Cooper, FCC (by e-mail)  
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U.S. Department of Commerce (by overnight delivery)  
U.S. Department of State (by overnight delivery)