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May 4, 2015

By IBFS

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

Re: 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

Change in Information to Whom Correspondence Should Be Sent for Pacnet International and Pacnet Services (USA) Inc.

Dear Ms. Cooper:

On February 2, 2015, Pacnet International Limited (“Pacnet International.”), Pacnet Limited, Pacnet Services (USA) Inc., (“Pacnet Services”), Telstra Holdings Pty Limited (“Telstra Holdings”), and Bedrock Holdings (Bermuda) Limited (“Bedrock Holdings”) (collectively, the “Applicants”) filed the above-referenced application (“Application”) with the Federal Communications Commission (“Commission”) requesting consent to the transfer of control of Pacnet Services. In the Application, the Applicants indicated that further correspondence for Pacnet International and Pacnet Services should be directed to Simon George Smith, Director of Regulatory Affairs.

By letter dated April 29, 2015, counsel for the Applicants provided the Commission with a supplement to the Application, explaining that Telstra Holdings will now acquire indirect control of Pacnet Services through a two-step transaction, the first step of which has already been completed.¹ Prior to the first step, direct ownership and control of Pacnet

¹ See Letter of Edward A. Yorkgitis, Jr., Kelley Drye & Warren, LLP, Counsel to Pacnet Limited and Pacnet Services (USA) Inc., and John J. Heitmann, Kelley Drye & Warren, LLP, Counsel to Telstra Holdings, to Marlene H. Dortch, Secretary, Federal

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Services were transferred on a *pro forma* basis to Pacnet International. Subsequently, as the first step, Pacnet Limited, then a subsidiary of Pacnet International, was then transferred to Telstra Holdings, along with Pacnet Limited's subsidiaries. Upon receipt of Commission approval, the Applicants will consummate the second step of the transaction, namely Pacnet Global Corporation (S) Pte. Ltd., now a Telstra Holdings indirect subsidiary, will purchase 100 percent ownership of Pacnet Services from Pacnet International.

Through this supplemental submission, Pacnet International and Pacnet Services hereby notify the Commission that future correspondence related to the Application and addressed to either Pacnet International or Pacnet Services should be directed to:

Brian Churm
Secretary and Director of Operations
Pacnet Services (USA), Inc.
100 Pringle Ave, Suite 515
Walnut Creek, CA 95496
Phone: (707) 354-2800
Email: Brian.Churm@pacnet.com

Communications Commission, Supplement to 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 (April 29, 2015).

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Questions regarding this filing should be directed to the undersigned counsel at
(202) 342-8400.



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*Counsel for Pacnet International Limited and
Pacnet Services (USA), Inc.*

cc: Tyrone Brown, DOJ (by e-mail)
John Carlin, DOJ (by e-mail)
Jonathan Frenkel, FBI (by e-mail)
Richard Hagar (by e-mail)
Shahram Hojati, DOJ (by e-mail)
David Krech, FCC (by e-mail)
Defense Information Systems Agency (by overnight delivery)
U.S. Department of Commerce (by overnight delivery)
U.S. Department of State (by overnight delivery)