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April 6, 2020

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: China Unicom (Americas) Operations Limited
SCL-T/C-20170301-00004

Dear Ms. Dortch:

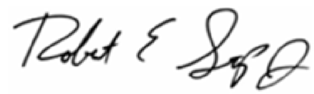
At the direction and on behalf of China Unicom (America) Operations Limited ("**CUA**"), the undersigned counsel hereby submits this letter regarding file number SCL-T/C-20170301-00004. Specifically, in response to inquiry from International Bureau staff, CUA has reviewed the notification filed March 1, 2017 ("**Pro Forma Notification**"), and determined that the notification was not necessary because CUA did not hold any interests in the Trans-Pacific Express Cable Network ("**TPE**"). Instead, the interests that were the subject of that notification were originally applied for by, granted to, and have always been held by, China United Telecommunications Corporation, later renamed China United Network Communications Group Company Limited ("**China Unicom**").[1]

[1] See File No. SCL-LIC-20070222-00002. In addition to its original interests in TPE, pursuant to a corporate restructuring that occurred effective as of January 1, 2009, China Unicom absorbed China Network Communications Group Corporation ("**China Netcom**"), resulting in the pro forma assignment of China Netcom's interest in TPE to China Unicom. See File No. SCL-ASG-20090204-00001.

CUA is part of the larger China Unicom family of companies, the company through which U.S. operations are conducted, and an indirect subsidiary of China Unicom. When an internal restructuring of China Unicom subsidiaries took place on January 31, 2017, it necessitated filing a pro forma notification with respect CUA's FCC licenses, including its international Section 214 authorizations.[2] In preparing the necessary filing, however, the TPE interests were mistakenly included as part of that notice because it was believed at the time that CUA held all FCC licenses for the China Unicom family of companies. As stated above, we confirm that: (i) China Unicom has always directly held its interests in TPE, and (ii) CUA has never held such interests.

If you have any questions or require additional information, please let me know.

Respectfully submitted,



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[2] A discussion of the restructuring is included in the Pro Forma Notification. The two international Section 214 authorizations bear file numbers ITC-214-20020728-00361 and ITC-214-20020724-00427.