

REQUEST FOR DECLARATORY RULING

ITC Global, Inc. (ITC), pursuant to Section 1.2 of the Commission's Rules, respectfully requests a declaratory ruling that the public interest will not be adversely affected by direct and indirect ownership in ITC by two citizens of Australia and one citizen of the United Kingdom, totalling in excess of 25 percent of the ownership interests in ITC.

Seaspin Pty Ltd., Aphrodite Trust A/C (Seaspin) holds 16.7% of the capital stock of ITC. Seaspin is an Australian corporation. Controlling interest in Seaspin is held by Charles Morgan, a citizen of Australia.

Christopher R. Hill, a citizen of Australia, holds 8.6% of the capital stock of ITC in his own right.

CRH Telnet (CRH), an Australian corporation, holds 0.2% of the capital stock of ITC. CRH is controlled by Christopher R. Hill.

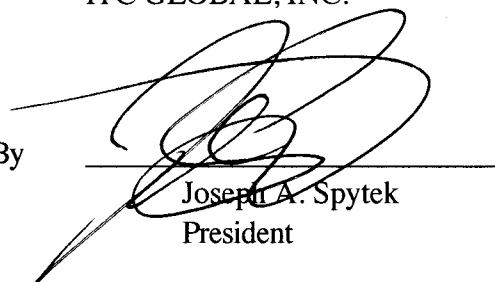
Simon Bull, a citizen of the United Kingdom, holds 4.8% of the capital stock of ITC.

Collectively, these three individuals hold, directly and indirectly, 30.3% of the capital stock in ITC.

Consistent with the Commission's policy concerning citizens of nations which are members of the World Trade Organization, ITC respectfully requests that the Commission declare that the public interest would not be adversely affected by these citizens of Australia holding more than one-fifth of the capital stock of ITC.

Respectfully submitted,  
ITC GLOBAL, INC.

By



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Joseph A. Spytek  
President

Dated: \_\_\_\_\_

4 May 2011