

February 7, 2018

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St. SW  
Room TW-B204  
Washington, D.C. 20554

Re: *Applications for the Transfer of Control of AST Telecom, LLC d/b/a Bluesky, American Samoa Hawaii Cable, LLC, and Samoa American Samoa Cable, LLC from Amper S.A. to Amalgamated Telecom Holdings Limited and Request for Declaratory Ruling; IB Docket No. 16-420*

Dear Ms. Dortch:

Amalgamated Telecom Holdings Limited (“ATH”), by its undersigned counsel, supplements the above-referenced applications to transfer control of AST Telecom, LLC d/b/a Bluesky (“AST”), American Samoa Hawaii Cable, LLC, and Samoa American Samoa Cable, LLC (collectively, the “Bluesky Licensees”), from Amper, S.A. to ATH. Specifically, this supplement notifies the Commission of a new foreign carrier affiliate of ATH, as well as confirms the recent formation of “U.S. HoldCo” as described in the applications.

With respect to the applications to transfer control of the cable landing license for the American Samoa Hawaii Cable system and international Section 214 authority held by AST, ATH supplements its responses to 47 C.F.R. §§ 1.767(a)(8)(ii)-(iv), 63.18(i)-(k), and 63.24(e)(2). In 2017, ATH acquired 100 percent of the shares of Telecom Vanuatu Limited (“Telecom Vanuatu”). Telecom Vanuatu is identified on the FCC’s list of foreign carriers presumed to possess market power in a foreign market (in this case Vanuatu).<sup>1</sup> Neither ATH nor Telecom Vanuatu owns or controls a cable landing station in Vanuatu.

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<sup>1</sup> The International Bureau Revises and Reissues the Commission’s List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Public Notice, DA No. 07-233 (rel. Jan. 26, 2007).

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Upon consummation of the proposed transaction, the Bluesky Licensees also will become affiliated with Telecom Vanuatu. Upon consummation, ATH will ensure that AST will comply with the dominant carrier safeguards contained in Section 63.10(c) of the Commission's rules on the route between the United States and Vanuatu, while reserving the right to seek reclassification in the future. Vanuatu is a World Trade Organization member.

With respect to those same applications, the related applications to transfer control of AST's satellite earth station authorizations and various wireless licenses, and the petition for declaratory ruling filed with respect to 47 U.S.C. § 310(b), ATH supplements its responses to 47 C.F.R. §§ 1.767(a)(8)(i), 1.990(a), 63.18(h), and 63.24(e)(2), FCC Form 312 Questions 34 and A20, and FCC Form 603 Questions 99a and 99b. ATH has formed a wholly-owned U.S.-incorporated holding company – described as “U.S. HoldCo” in the applications – that will purchase all of the issued and outstanding member interests of AST. The name of U.S. HoldCo is Amalgamated Bluesky Telecom Holdings Incorporated, and it was organized under the laws of the state of Delaware. Its address is Level 2, Harbour Front Building, Rodwell Rd., G.P.O. Box 11643, Suva, Fiji Islands.

Please contact the undersigned if you have any questions regarding this supplement.

Respectfully submitted,

/s/ Jennifer L. Kostyu

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cc: David Krech  
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