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April 12, 2002

BY HAND DELIVERY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, N.E., Ste. 110  
Washington, DC 20002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

IB DKT. 02-111

Re: Application on FCC Form 312 for a Transfer of Control from Bell Atlantic New Zealand Holdings, Inc. to Pacific Telecom Inc. of the Common Camer Earth Station Licensed to GTE Pacifica, Inc.; Call Sign: E000164; IBFS File No. IB2002000513

Dear Mr. Caton:

On April 11, 2002, Bell Atlantic New Zealand Holdings, Inc. and Pacific Telecom Inc. filed electronically via the International Bureau's Filing System the above-referenced application on FCC Form 312 for approval to transfer control of the license for the common carrier earth station with call sign E000164 held by GTE Pacifica, Inc. Exhibit. Item 32 to that application inadvertently omitted a diagram summarizing the ownership information after consummation of the proposed transaction. Enclosed for inclusion with that exhibit is the diagram.

We apologize for any inconvenience this omission may have caused. Should you have any questions, please do not hesitate to contact the undersigned or counsel for Pacific Telecom, Ken Patrich (202-383-3342) and Tim Cooney (202-383-3361) of Wilkinson Barker Knauer LLP. Thank you.

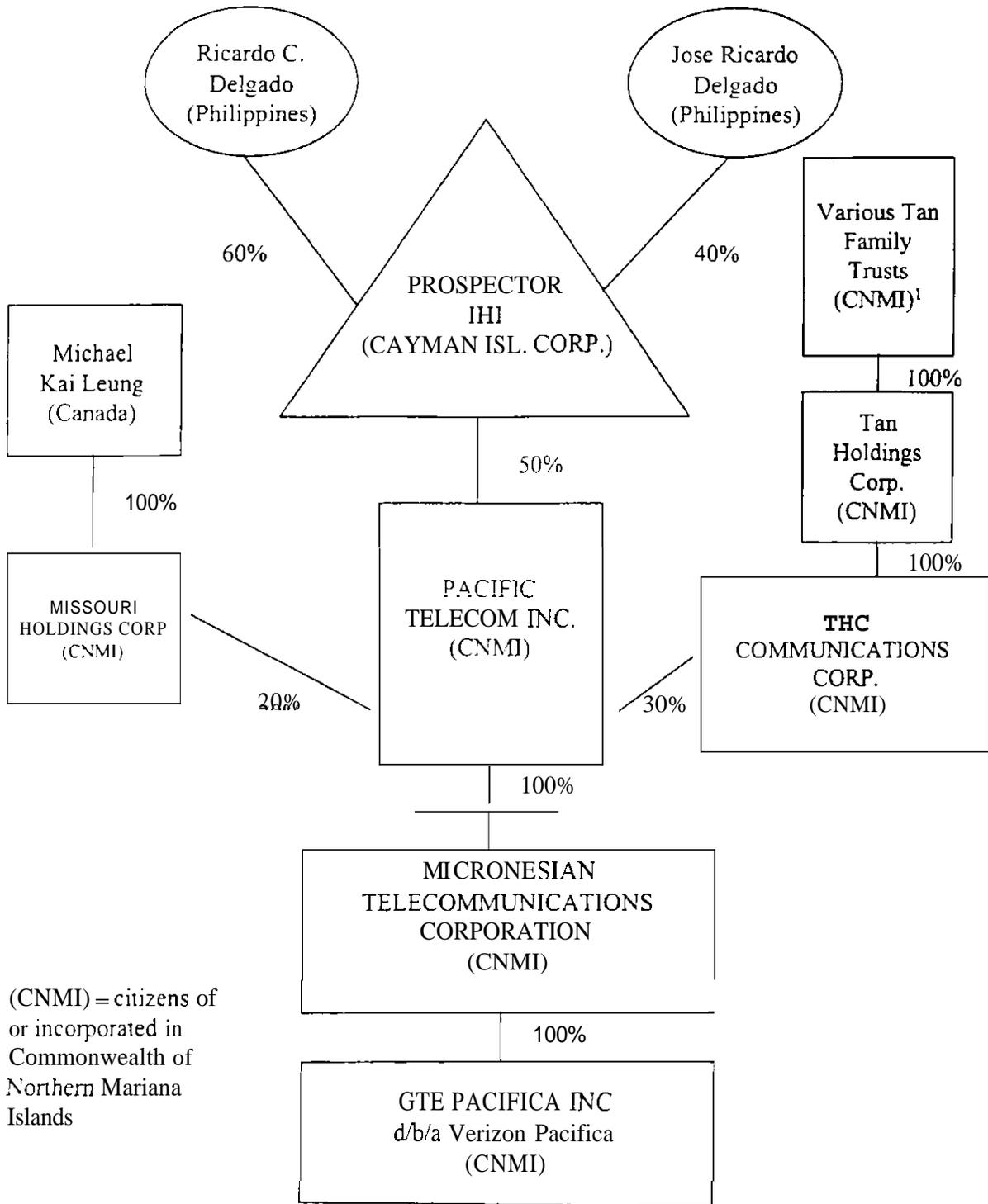
Sincerely,

Jennifer D. Hindin

cc: Neil Dellar  
John Branscome  
Claudia Fox  
Bill Dever  
Frank Peace

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Not Att'd

# PACIFIC TELECOM INC. OWNERSHIP STRUCTURE



<sup>1</sup> See *Petition for Declaratory Ruling Under Section 310(b)(4)* for description of 7 percent foreign (WTO) beneficiaries (2.1 percent diluted foreign interest in Pacific Telecom Inc.).