

6. Name of Assignor / Transferor

|                   |                                            |                          |                         |
|-------------------|--------------------------------------------|--------------------------|-------------------------|
| <b>Name:</b>      | Guam Wireless Telephone<br>Company, L.L.C. | <b>Phone<br/>Number:</b> | 671-788-0588            |
| <b>DBA Name:</b>  |                                            | <b>Fax Number:</b>       | 671-788-1001            |
| <b>Street:</b>    | 125 Tun Jesus Crisostomo st.<br><br># 208  | <b>E-Mail:</b>           | johnwu@guamwireless.com |
| <b>City:</b>      | Tamuning                                   | <b>State:</b>            | GU                      |
| <b>Country:</b>   | USA                                        | <b>Zipcode:</b>          | 96913                   |
| <b>Attention:</b> | John Wu                                    |                          |                         |

7. Name of Assignee / Transferee

|                   |                              |                      |                      |
|-------------------|------------------------------|----------------------|----------------------|
| <b>Name:</b>      | Guam Cellular & Paging, Inc. | <b>Phone Number:</b> | 671-649-7243         |
| <b>DBA Name:</b>  |                              | <b>Fax Number:</b>   | 671-649-7247         |
| <b>Street:</b>    | 219 S Marine Drive Ste 206   | <b>E-Mail:</b>       | tgibson@guamcell.net |
| <b>City:</b>      | Tamuning                     | <b>State:</b>        | GU                   |
| <b>Country:</b>   | USA                          | <b>Zipcode:</b>      | 96911                |
| <b>Attention:</b> | TOM GIBSON                   |                      | -                    |

8a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity     Noncommercial educational licensee     Notification of Pro Forma (No fee required.)
- Other (please explain):

8b. You must file a separate application for each legal entity that holds one or more Section 214 authorizations to be assigned or transferred.

Fee Classification CUT - Section 214 Authority

9. Description (Summarize the nature of the application.)

(If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Application to Assign International Section 214 Authorization From  
Guam Wireless Telephone Company, L.L.C. to Guam Cellular and Paging,  
Inc. (As Controlled By DoCoMo Guam Holdings, Inc.)

10. In Attachment 1, please respond to paragraphs (c) and (d) of Section 63.18 with respect to the assignor/transferor and the assignee/transferee. Label your response "Answer to Question 10".

11. Does any entity, directly or indirectly, own at least ten (10) percent of the equity of the assignee/transferee as determined by successive multiplication in the manner specified in the note to Section 63.18(h) of the rules?

Yes  No

If you answered "Yes" to this question, provide in Attachment 1, the name, address, citizenship, and principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of the assignee/transferee, and the percentage of equity owned by each of those persons or entities (to the nearest one percent). Label your response "Answer to Question 11."

12. Does the assignee/transferee have any interlocking directorates with a foreign carrier?

Yes  No

If you answered "Yes" to this question, identify each interlocking officer/director in Attachment 1. (See Section 63.09(g).) Provide the name and position/title of the individual or entity, the name of the foreign carrier, and the country in which the foreign carrier is authorized to operate. Label your response: "Answer to Question 12."

13. Provide in Attachment 1 a narrative of the means by which the proposed assignment or transfer of control will take place. In circumstances of a substantial assignment or transfer of control pursuant to Section 63.24(e), where the assignor seeks authority to assign only a portion of its U.S. international assets and/or customer base, please specify whether the assignor requests authority to continue to operate under any or all of its international Section 214 File Nos. after consummation; and, if so, please specify in Attachment 1 each File No. it seeks to retain in its own name. Label your response "Answer to Question 13."

Note: The assignor may retain any or all of its international Section 214 File Nos. In that case, the assignor will continue to hold the international section 214 authorizations that it specifies in response to this question. The ITC-ASG File No. that the Commission assigns to this application will, when granted, constitute Commission authorization of the proposed assignment of assets and /or customers from the assignor to the assignee. Unless Commission grant of the assignment application specifies otherwise, the assignee may provide the same services on the same routes as permitted under the assignor's Section 214 authorization(s), and the assignee may provide such service to any customers it may obtain in the ordinary course of business.

If this filing is not a notification of a pro forma assignment or pro forma transfer of control, please respond to Questions 14-20 below. (See Section 63.24(d).) Otherwise, you may proceed to Question 21 below.

14. Check "Yes" below if the assignee is a foreign carrier or if, upon consummation of the proposed assignment or transfer of control, the Section 214 holder would be affiliated with a foreign carrier. (See Section 63.18 (i).) The terms "foreign carrier" and "affiliated" are defined in Section 63.09 (d) & (e) of the rules respectively.  Yes  No

If you answered "Yes" to this question, please specify in Attachment 1 each foreign country in which the assignee is a foreign carrier or in which the Section 214 holder, upon consummation, would be affiliated with a foreign carrier. Label your response, "Answer to Question 14."

15. If this application is granted and the proposed assignment or transfer is consummated, would the Section 214 holder be authorized to provide service to any destination country for which any of the following statements is true?

Yes  No

- (1) The Section 214 holder is a foreign carrier in that country; or
- (2) The Section 214 holder controls a foreign carrier in that country; or
- (3) Any entity that owns more than 25 percent of the Section 214 holder, or that controls the Section 214 holder, controls a foreign carrier in that country.
- (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Section 214 holder and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

If you answered "Yes" to this question, please specify in Attachment 1 each foreign carrier and country for which any of the above statements would be true. Label your response, "Answer to Question 15."

16. If you answered "Yes" to question 14, do you request classification of the Section 214 holder as a "non-dominant" carrier, upon consummation of the proposed transaction, between the United States and any or all countries listed in response to Question 14? See Section 63.10 of the rules.

Yes  No

If you answered "Yes" to this question, you must provide information in Attachment 1 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination country route where it would be a foreign carrier, or would be affiliated with a foreign carrier and for which you request non-dominant classification. Label your response, "Answer to Question 16."

17. If you answered "Yes" to question 14 and you have not provided information in response to Question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination route where it would be a foreign carrier, or be affiliated with a foreign carrier, check "Yes" below to certify that the assignee/transferee agrees to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in the provision of international service between the United States and any foreign country(ies) for which you have not provided the required information.

Yes, I certify that I agree to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in my provision of international service between the United States and the following foreign country(ies):

Japan

No, Does not apply.

18. If you answered "Yes" to question 15, and if you have not provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules in its provision of service to each of the countries identified in response to question 15, the Section 214 holder may not be eligible to provide international telecommunications service between the U.S. and each such country following consummation of the assignment or transfer. In order to determine whether the public interest would be served by authorizing service on these U.S.-destination country routes, the assignee/transferee must provide information, in Attachment 1, to satisfy one of the showings specified in Section 63.18(k) of the rules. Label your response, "Answer to Question 18."

19. If the assignee, or the Section 214 holder that is the subject of this transfer of control application, is a provider of Commercial Mobile Radio Services, you need not answer this question.

If any of the Section 214 authorization(s) that would be assigned or transferred, authorize the Section 214 holder to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country listed in response to question 14, and unless you have provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10(a)(3) of the rules for each country, check "Yes" below to certify that the assignee/transferee will file the quarterly traffic reports required by Section 43.61(c) of the rules; and/or state in Attachment 1 that the foreign carrier(s) for which the applicant has not made a showing under Section 63.10(c)(3) do(es) not collect settlement payments from U.S. international carriers. (See Section 63.18(l).)

Yes, I certify that I agree to comply with the quarterly traffic reporting requirements set forth in section 43.61( c ) of the rules.

20. If the applicant desires streamlined processing pursuant to Section 63.12 of the rules, provide in Attachment 1 a statement of how the application qualifies for streamlined processing. (See Section 63.18(p).) Note that, if the application is being filed in connection with a sale of assets or reorganization of a carrier or its parent pursuant to the U.S. bankruptcy laws, the application may not be eligible for streamlined processing until final bankruptcy court approval of the proposed sale or reorganization.

Applicant certifies that its responses to questions 21 through 25 are true:

21. The assignee/transferee certifies that it has not agreed to accept special concessions directly or indirectly from a foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into any such agreements in the future.  Yes  No

22. By signing this application, the undersigned certify either (1) that the authorization(s) will not be assigned or that control of the authorization(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) that prior Commission consent is not required because the transaction is subject to the notification procedures for pro forma transactions under Section 63.24 of the rules. The assignee/transferee also acknowledges that the Commission must be notified by letter within 30 days of a consummation or of a decision not to consummate. (See Section 63.24(e)(4).)  Yes  No

23. If this filing is a notification of a pro forma assignment or transfer of control, the undersigned certify that the assignment or transfer of control was pro forma and that, together with all previous pro forma transactions, does not result in a change in the actual controlling party.  Yes  No  
 Not a Pro Forma

|                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <p>24. The undersigned certify that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>                                                                                                                                                                                          | <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> |
| <p>25. The assignee/transferee certifies that neither it nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.</p> | <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> |

**CERTIFICATION**

|                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>26. Printed Name of Assignor / Transferor<br/>Guam Wireless Telephone Company, L.L.C.</p>                                                                                                                                                                                                                                  | <p>29. Printed Name of Assignee / Transferee<br/>Guam Cellular and Paging, Inc.</p>                                                                |
| <p>27. Title (Office Held by Person Signing)<br/>Managing Member</p>                                                                                                                                                                                                                                                          | <p>30. Title (Office Held by Person Signing)<br/>Chairman, President and CEO</p>                                                                   |
| <p>28. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files)<br/>John K. Wu</p>                                                                                                                                                                                  | <p>31. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files)<br/>Phillip N. Lyons</p> |
| <p style="text-align: center;"><b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT<br/>(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION<br/>(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</b></p> |                                                                                                                                                    |

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**STAMP & RETURN**

**LAW OFFICES OF THOMAS K. CROWE, P.C.**

1250 24th STREET, N.W.  
SUITE 300  
WASHINGTON, D.C. 20037

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TELEPHONE (202) 263-3640  
FAX (202) 263-3641  
E-MAIL [firm@tkcrowe.com](mailto:firm@tkcrowe.com)

April 11, 2006

**BY HAND**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RECEIVED**

APR 11 2006

Federal Communications Commission  
Office of Secretary

Re: Amendment to the Application to Assign the International  
Section 214 Authorization of Guam Wireless Telephone Company,  
L.L.C. to Guam Cellular and Paging, Inc.; ITC-ASG-20060404-00181

Dear Ms. Dortch:

By this letter, Guam Wireless Telephone Company, L.L.C. ("Guam Wireless") and Guam Cellular and Paging, Inc. ("Guam Cellular") amend and replace Attachment 1 of the above-referenced application to assign the international Section 214 authorization of Guam Wireless to Guam Cellular (the "Application").

The Application was filed electronically on April 4, 2006 via the International Bureau's Filing System ("IBFS").<sup>1</sup> The Application has not yet been placed on public notice. Only Attachment 1 to the Application is being amended, but we include for your convenience a copy the FCC's electronic 214 Main Form application.

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<sup>1</sup> The amended Attachment 1 is being filed on paper because IBFS does not allow amendments to be filed electronically.

Marlene H. Dortch  
April 11, 2006  
Page 2

If you have any questions regarding this amendment, please contact the undersigned.

Sincerely,



Thomas K. Crowe  
Gregory E. Kunkle\*,  
Counsel for Guam Wireless  
Telephone Company, L.L.C.

cc: David LaFuria (Counsel to Guam Cellular)  
David Krech (International Bureau)  
Susan O'Connell (International Bureau)

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\* Admitted only in Virginia; practice limited to federal communications matters.

## ATTACHMENT 1

### **Application To Assign International Section 214 Authorization From Guam Wireless Telephone Company, L.L.C To Guam Cellular and Paging, Inc. (As Controlled By DoCoMo Guam Holdings, Inc.)**

This application ("Application") is one of a series of concurrently-filed applications seeking Commission consent for NTT DoCoMo, Inc. ("DoCoMo") to acquire indirectly all ownership shares of Guam Cellular and Paging, Inc. ("Guam Cellular") and certain wireless assets of Guam Wireless Telephone Company, L.L.C. ("Guam Wireless"). As further discussed below, control of Guam Cellular will be transferred to DoCoMo Guam Holdings, Inc. ("DoCoMo Guam"), a wholly-owned subsidiary of DoCoMo organized under the laws of Guam, and the assets of Guam Wireless will be assigned to Guam Cellular. The proposed transfer and assignment will occur simultaneously upon consummation.

Accordingly, the Application seeks consent to assign Guam Wireless' international Section 214 authorization to Guam Cellular, as controlled by DoCoMo. Information in the Application addressing Guam Cellular assumes approval of DoCoMo's proposed indirect ownership of Guam Cellular through DoCoMo Guam. A separate Section 214 application is being filed concurrently seeking consent to transfer control of Guam Cellular to DoCoMo Guam.

#### **Answers to Question 10**

##### ***Assignor Contact Information***

John K. Wu  
Managing Member  
Guam Wireless Telephone Company L.L.C.  
125 Tun Jesus Crisostomo  
Suite 208  
Tamuning, GU 96913  
(671) 788-0588

*With a copy to:*

Thomas K. Crowe  
Legal Counsel  
Law Offices of Thomas K. Crowe, PC  
1250 24<sup>th</sup> St., N.W.  
Suite 300  
Washington, D.C. 20037  
(202) 263-3640

##### ***Assignee Contact Information***

Tom Gibson  
Guam Cellular and Paging, Inc.  
219 S. Marine Dr  
Suite 206  
Tamuning, GU 96913  
(671) 649-7243

*With a copy to:*

David LaFuria  
Lukas, Nace, Gutierrez & Sacks, Chartered  
1650 Tysons Blvd.  
Suite 1500  
McLean, VA 22102  
(703) 584-8661

***Prior International Section 214 Authorizations***

Assignor Guam Wireless holds international Section 214 authorization ITC-214-20000507-00304 to provide global international telecommunications service on a facilities and resale basis pursuant to Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules.

Assignee Guam Cellular holds global facilities-based authority pursuant to Section 63.18(e)(1) of the Commission's rules. File No. ITC-214-19961120-00583. Guam Cellular also holds global resale authority pursuant to Section 63.18(e)(2) of the Commission's rules. File No. ITC-214-20040517-00201. Neither DoCoMo nor DoCoMo Guam holds an international Section 214 authorization.

**Answers to Question 11**

Pursuant to Section 63.18(h) of the Commission's rules, following is the relevant ownership information listing the entities that will directly or indirectly hold a ten percent or greater interest in Assignee Guam Cellular.

***Direct Ownership***

Name: DoCoMo Guam Holdings, Inc.  
Address: c/o NTT DoCoMo USA, Inc.  
1399 New York Ave., NW  
Suite 450  
Washington, D.C. 20005  
Citizenship: Guam (U.S.)  
Principal Business: Telecommunications and information services  
Percentage Held: 100 percent direct voting and equity interest in Guam Cellular

***Indirect Ownership***

Name: NTT DoCoMo, Inc.  
Address: 2-11-1 Nagata-cho  
Chiyoda-ku, Tokyo 100-6150  
Japan  
Citizenship: Japan  
Principal Business: Mobile telecommunications and information services  
Percentage Held: 100 percent direct voting and equity interest in DoCoMo Guam,  
thus 100 percent indirect interest in Guam Cellular

Name: Nippon Telegraph and Telephone Corporation (“NTT”)  
Address: 3-1, Otemachi 2-Chome  
Chiyoda-ku, Tokyo 100-8116  
Japan  
Citizenship: Japan  
Principal Business: Telecommunications and information services  
Percentage Held: 61.96 percent direct voting and equity interest in DoCoMo, thus  
61.96 percent indirect interest in Guam Cellular<sup>1</sup>

Name: Japan Ministry of Finance  
Address: 3-1-1 Kasumigaseki  
Chiyoda-ku, Tokyo 100-8940  
Japan  
Citizenship: Japan  
Principal Business: Japanese government  
Percentage Held: 38.37 percent direct voting and equity interest in NTT, thus 23.77  
percent indirect interest in Guam Cellular<sup>2</sup>

DoCoMo and NTT are publicly-traded corporations. Other than the entities disclosed above, no single entity directly or indirectly holds a ten percent or greater ownership interest in Guam Cellular. Guam Cellular has no interlocking directorates with a foreign carrier.

### **Answer to Question 13**

#### ***Description of Transaction***

On March 20, 2006, DoCoMo entered into: (1) a Share Purchase Agreement with the shareholders of Guam Cellular; and (2) an Asset Purchase Agreement with Guam Wireless. Guam Cellular and Guam Wireless provide commercial mobile radio service (“CMRS”) in Guam and the Northern Mariana Islands (“CNMI”), both of which are classified as rural service areas and which collectively have a population of less than 225,000 people. Guam Cellular also provides landline interexchange and international services. The parties intend to close the Share Purchase Agreement and the Asset Purchase Agreement simultaneously.

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<sup>1</sup> Pursuant to Section 63.18(h) of the Commission’s rules, attribution of indirect ownership interests held indirectly by through one or more intervening entities will be determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain and application of the relevant attribution benchmark to the resulting product, except that wherever the ownership percentage for any link in the chain equals or exceeds 50 percent or represents actual control, it shall be treated as if it were a 100 percent interest.

<sup>2</sup> See *id.*

To effectuate the Share Purchase Agreement, DoCoMo has formed DoCoMo Guam, a wholly-owned subsidiary organized under the laws of Guam. Under the Share Purchase Agreement, DoCoMo, through DoCoMo Guam, will acquire 100 percent of the common shares of Guam Cellular for cash consideration. Following DoCoMo Guam's acquisition of the shares, Guam Cellular will continue in existence and become an indirect wholly-owned subsidiary of DoCoMo.

Under the Asset Purchase Agreement, DoCoMo will acquire for cash consideration certain assets, properties, goodwill and rights of Guam Wireless used to provide wireless voice and data communications products and services in Guam and the CNMI. To effectuate the acquisition, Guam Wireless will assign its FCC authorizations and certain other assets, properties, goodwill and rights to Guam Cellular. Upon closing, Guam Cellular will hold Guam Wireless' wireless-related assets and will continue to operate the business of Guam Wireless. Guam Cellular also will become the licensee of Guam Wireless' international Section 214 authorization.

Currently, DoCoMo expects to retain most of the managerial officers and employees of both Guam Cellular and Guam Wireless and to continue operating, for the time being, two separate networks in Guam and the CNMI. DoCoMo's plans include enhancing the quality of Guam Wireless' GSM network by adding General Packet Radio Service ("GPRS") capability and in the future deploying a W-CDMA network for third generation ("3G") services over Guam Cellular's cellular licenses.

The parties are filing a series of applications to effectuate the proposed transaction. In addition to the Application, the parties are filing a joint international/domestic Section 214 application seeking Commission consent to transfer control of Guam Cellular to DoCoMo Guam. Two FCC Form 603 applications also are being submitted, one which seeks Commission consent to assign Guam Wireless' PCS license to Guam Cellular (as controlled by DoCoMo through DoCoMo Guam) and one which seeks Commission consent to transfer control of Guam Cellular to DoCoMo (through DoCoMo Guam). In addition, the parties are seeking a declaratory ruling that upon consummation of the transaction, the public interest would not be served by denying approval of DoCoMo's indirect foreign ownership of Guam Cellular pursuant to Section 310(b)(4) of the Communications Act of 1934, as amended.

A more detailed description of this transaction, request for declaratory ruling, and public interest demonstration is attached hereto.

#### **Answer to Question 14**

Upon consummation of the proposed transaction, Guam Cellular will become affiliated with certain foreign service providers by virtue of DoCoMo's indirect interest in Guam Cellular. Specifically, Guam Cellular will become affiliated with foreign carriers in the following countries: Japan, the United Kingdom, France, Italy, Germany, Belgium, the Netherlands, Hong Kong, China, Korea, Australia, Singapore, Brazil, Taiwan, Malaysia, and Sri Lanka.

### **Answer to Question 15**

Upon consummation of the proposed transaction, Guam Cellular will become affiliated with the foreign carriers identified below because it will be a wholly-owned indirect subsidiary of DoCoMo and a partially-owned indirect subsidiary of NTT. DoCoMo and/or NTT directly or indirectly control each of the following foreign carriers. The country or countries in which each company is licensed to provide service also is noted below.

- NTT DoCoMo Hokkaido, Inc. (Japan)
- NTT DoCoMo Tohoku, Inc. (Japan)
- NTT DoCoMo Tokai, Inc. (Japan)
- NTT DoCoMo Hokuriku, Inc. (Japan)
- NTT DoCoMo Kansai, Inc. (Japan)
- NTT DoCoMo Chugoku, Inc. (Japan)
- NTT DoCoMo Shikoku, Inc. (Japan)
- NTT DoCoMo Kyushu, Inc. (Japan)
- NTT East Corporation (Japan)
- NTT West Corporation (Japan)
- NTT Communications Corporation (Japan)
- NTT-ME CORPORATION (Japan)
- NTT NEOMEIT CORPORATION (Japan)
- NTT Europe Ltd. (the United Kingdom, France, Italy, Germany, Belgium, and the Netherlands)
- NTT Com Asia Limited (China and Hong Kong)
- NTT Korea Co., Ltd. (Korea)
- NTT Australia Pty Ltd. (Australia)
- NTT Singapore Pte. Ltd. (Singapore)
- inter-touch Spectrum Pte. Ltd. (Singapore) (not yet providing telecommunications services)
- NTT do Brasil Telecomunicações Ltda. (Brazil)
- NTT Taiwan Ltd. (Taiwan)
- NTT MSC Bdn. Shd. (Malaysia)
- Sri Lanka Telecom Ltd. (Sri Lanka)

**Answer to Questions 16 and 18**

Pursuant to Section 63.10 of the Commission's rules, Guam Cellular requests "non-dominant" status upon consummation of the proposed transaction on all routes between the United States and the countries listed in response to Question 15 above, *except* Japan (the "Non-Dominant Routes"). Each of those countries is a member of the World Trade Organization ("WTO"). Further, none of the foreign carrier affiliates that operate at the foreign end of each Non-Dominant Route is a monopoly provider of communications services, and each lacks 50 percent market share in the international transport and local access markets on the foreign end of its respective U.S.-international route. Accordingly, under Section 63.10(a) and 63.18(k)(2), Guam Cellular is presumptively classified as non-dominant on all of the Non-Dominant Routes.