

June 19, 2008

Filed via ECFS

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

**Re: WC Docket No. 08-54; Domestic Section 214 Application Filed for the
Transfer of Assets of IT&E Overseas, Inc. to PTI Pacifica, Inc.**

Dear Ms. Dortch:

GTA TeleGuam, LLC (“GTA”), through its undersigned counsel, files this *ex parte* letter to supplement the Petition to Condition filed by GTA and other telecommunications providers operating in Guam and the Commonwealth of the Northern Marianas Islands (“CNMI”) in the above-referenced docket (the “Joint Petition”).¹ The application filed in this docket (and the associated applications being processed by the International Bureau and Wireless Telecommunications Bureau) seek the Commission’s approval to transfer the assets and business of IT&E Overseas, Inc. (“IT&E”), and IT&E’s associated Commission licenses, to PTI Pacifica, Inc. (“PTI”). The Joint Petition requested that the Commission impose conditions on any approval of the transaction to ensure that IT&E and PTI cannot be able to use their combined market power to hinder effective competition in Guam and the CNMI.

GTA, through its subsidiaries, has provided a full range of local, long distance, broadband and wireless services to the residents and businesses of Guam for over 40 years. In the last two years, GTA has invested over \$30 million to upgrade Guam’s telecommunications network and services, and the company plans additional investments of \$70 million.

PTI’s proposed acquisition of IT&E is troubling for several reasons, many of which are discussed in the Joint Petition. GTA will not repeat the arguments made in the Joint Petition; instead, this letter focuses on a single issue: the potential impact of the proposed acquisition on the national security of the United States.

Guam is of critical and strategic importance to the national security of the United States. While Guam has long had a large military presence, the island is in the process of being transformed into the epicenter of U.S. military operations in the Western Pacific. In addition to planned expansion of Naval Base Guam and Anderson Air Force Base, the U.S. Government is constructing a new base for the Marine Corps, expanding Guam’s naval facilities to accommodate aircraft carriers, and building missile defense facilities

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¹ *In re IT&E Overseas, Inc. and PTI Pacifica, Inc.*, WC Docket No. 08-54, *Petition to Condition* (filed May 12, 2008).

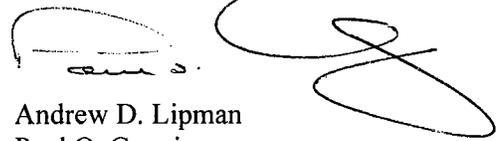
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for the Army.² Nearly 40,000 military personnel, contractors, and dependents expected to be transferred to the territory from other military facilities between now and 2014.³

Given the significance of these operations, GTA questions whether it is appropriate for IT&E -- the largest long distance carrier in Guam and a major provider of wireless and other services -- to be owned by the Philippines-based Delgado family. The Executive Branch has filed a letter in this proceeding asking that the Commission defer action on the applications until any national security issues are addressed. GTA supports that request and urges the Commission to work closely with the Executive Branch to take steps to ensure that the Delgados' proposed ownership does not threaten national security. Specifically, GTA submits that the combined IT&E/PTI should be required to divest any business that it does with the U.S. Armed Forces and should be prevented from providing services to the military in the future. In this way, the Commission and the Executive Branch can be confident that the planned acquisition does not threaten the vital security provided to our nation by our Guam-based armed forces.

We would be pleased to meet with the Commission's staff to discuss these matters further. Please contact the undersigned in that regard or if you have any questions regarding this letter.

Respectfully submitted,



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² Pacific Daily News, "Gates arrives on Guam: Governor talks buildup with Secretary of Defense," available at <http://www.guampdn.com/apps/pbcs.dll/article?AID=/20080530/NEWS01/805300306/1002> (May 30, 2008).

³ Washington Post, "Guam Braces for Peaceful Military Incursion," available at <http://www.washingtonpost.com/wp-dyn/content/article/2008/01/24/AR2008012403509.html> (Jan. 25, 2008).