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December 30, 2010

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

Re: Joint Application of Shamrock TeleGuam Holdings, LLC and AP  
TeleGuam Holdings, Inc., WC Docket No. 10-260; Petition for  
Declaratory Ruling, IBFS File No. ISP-PDR-20101216-00021

Dear Ms. Dortch:

AP TeleGuam Holdings, Inc., (AP TeleGuam Holdings), by its attorneys, hereby supplements the above-referenced applications and Petition for Declaratory Ruling by providing the following additional information for inclusion in the docket of this proceeding.

1. The sole shareholder of Cayman Capital Management II, Inc. is Douglas R. Stringer, a U.S. citizen. His address and phone number are:

Cayman Capital Management II, Inc.  
c/o Walkers  
Walker House, 87 Mary Street, George Town  
Grand Cayman KY1-9002, Cayman Islands

Phone: 852-2596-3345

We will update AP TeleGuam Holdings' Form 602 to include Mr. Stringer as a disclosable interest holder.

2. Although Advantage Partners, LLP (Advantage Partners) does not exercise direct or day-to-day control over Japan Ireland Investment Partners, Advantage Partners IV, ILP, or AP TeleGuam Holdings, Advantage Partners understands that the

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FCC may view Advantage Partners as having *de facto* control over AP TeleGuam Holdings, for purposes of its foreign ownership analysis. Information regarding Advantage Partners is already included in the Joint Application, filed December 17, 2010, and in the Form 602 currently on file for AP TeleGuam Holdings.

3. STG Representative Holdings, LLC, listed on page 4 of the Joint Application, is a Delaware limited liability company.

Please let me know if you have any questions regarding the information provided in this letter, or in the above-referenced applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Gil M. Strobel". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gil M. Strobel  
Counsel for AP TeleGuam Holdings, Inc.

cc: David Krech  
Jodie May  
Susan O'Connell