

LAWLER, METZGER, KEENEY & LOGAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

GIL M. STROBEL
gstrobel@lawlermetzger.com

PHONE (202) 777-7728
FACSIMILE (202) 777-7763

January 10, 2011

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

Dear Ms. Dortch:

AP TeleGuam Holdings, Inc., (AP TeleGuam Holdings), by its attorneys, hereby supplements the above-referenced application by providing additional information for inclusion in the docket of this proceeding. Specifically, the purpose of this letter is to clarify that Advantage Partners IV, ILP (Only for Qualified Institutional Investors (with Resale Restriction to Non-Qualified Institutional Investors) and for a Small Number of Other Investors), is an Investment Limited Partnership (ILP). An ILP is a partnership formed for the purpose of investing in enterprises. The main difference between an ILP and limited liability partnership (LLP) is that an ILP, unlike an LLP, includes both general and limited partners, with only the general partners having the rights and obligations to manage the partnership's operations. In an LLP each partner has limited liability, as well as the right and obligation to manage the partnership.

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

Sincerely,



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

cc: David Krech
Jodie May
Susan O'Connell