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January 20, 2011

*Via Electronic Filing*

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:

In response to an inquiry from Commission staff, AP TeleGuam Holdings, Inc., by its attorneys, hereby supplements the above-referenced application by providing additional information regarding 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) (“Advantage Partners IV”). As noted in the application, Advantage Partners IV is an Investment Limited Partnership (“ILP”) organized under Japanese law. An ILP is a form of organization authorized by Japan’s Limited Partnership Act for Investment.<sup>1</sup> As far as we are aware, United States law does not provide for the formation of ILPs. As indicated in the supplemental letter filed on January 10, 2011, however, Japanese ILPs operate in a fashion that is largely similar to the traditional limited liability partnerships (“LLPs”) that are common in the United States.

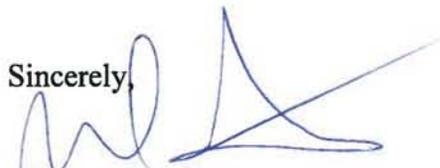
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<sup>1</sup> Tōshi Jigyo Yugen Sekinin Kumiai Keiyaku ni Kansuru hōritsu [Limited Partnership Act for Investment], Law No. 90 of June 3, 1998, *available at*: <http://www.japaneselawtranslation.go.jp/law/detail/?id=96&vm=04&re=02&new=1> (Japan) (establishing the ILP as a type of limited partnership under Japanese law).

Ms. Marlene Dortch  
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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