

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

February 9, 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;
ULS File No. 0004531711; Petition for Declaratory Ruling –
IBFS File No. ISP-PDR-2010216-00021

Dear Ms. Dortch:

AP TeleGuam Holdings, Inc. (AP TeleGuam Holdings), by its attorneys, hereby provides the following responses to the questions listed in the February 3, 2011 letter from James Ball, Chief of the Policy Division of the International Bureau.¹ Specifically, analyses of investor interests in AP IV GP Partnership and AP Cayman Partners II General Partner, L.P. are attached as Exhibit 1 to this letter. In addition, in response to the second question posed in Mr. Ball's letter, a document providing the principal place of business and related information for each of the non-U.S. entities listed in Annex 1 to the above-referenced Petition² is attached as Exhibit 2.

In the course of preparing this filing, AP TeleGuam Holdings discovered that the "Analysis of Investor Interests in the Limited Partners of the AP TG Funds," filed as Annex 2 to the Petition for Declaratory Ruling,³ inadvertently included information about the limited partners of Japan Ireland Investment Partners, L.P. in the table labeled "Japan

¹ Letter from James Ball, FCC, to Gil Strobel, Lawler, Metzger, Keeney & Logan, LLC (Feb. 3, 2011).

² Petition for Declaratory Ruling of AP TeleGuam Holdings, Inc., IBFS File No. ISP-PDR-20101216-00021 (Dec. 16, 2010) ("Petition for Declaratory Ruling"), *also attached* to Joint Application, WC Docket No. 10-260 (filed Dec. 17, 2010), and to ULS Application File No. 0004531711 (filed Dec. 16, 2010).

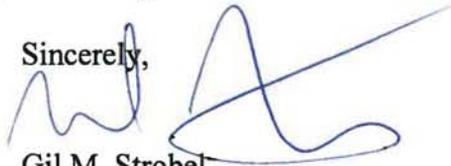
³ *Id.* at Annex 2.

Ms. Marlene Dortch
February 9, 2011
Page 2

Ireland Investment Partners.”⁴ Information about the investors in Japan Ireland Investment Partners is already set forth on page 7 of the Petition.⁵

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

Sincerely,



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

cc: James Ball
Carrie-Lee Early
Jodie May
Kathy Harris
David Krech
Neil Dellar

⁴ See *id.* at Annex 2, page 5.

⁵ *Id.* at 7; see also *id.* at Annex 1 (providing ownership information regarding each investor in Japan Ireland Investment Partners).

Exhibit 1

APIV GP PARTNERSHIP¹

Category of Investor	Aggregate % Equity	Country of Citizenship/ Country of Organization/ Principal Place of Business
Individuals that are citizens of the US	47.0%	United States
Individuals that are citizens of foreign countries (WTO members)	52.1%	Japan
Individuals that are citizens of foreign countries (non-WTO members)	0%	N/A
Banks, insurance companies, pension plans, and foundations/endowments organized in the US and controlled by US citizens	0%	N/A
Banks, insurance companies, pension plans, and foundations/endowments organized in the foreign countries (WTO members) and controlled by foreign citizens (WTO members)	0%	N/A
Banks, insurance companies, pension plans, and foundations/endowments organized in foreign countries (non-WTO members) and controlled by foreign citizens (non-WTO members)	0%	N/A
Private equity funds and mutual funds organized in the US and with principal place of business in the US	0%	N/A
Private equity funds and mutual funds organized in foreign countries (WTO members) and with principal place of business in foreign countries (WTO members)	1.0%	Japan
Private equity funds and mutual funds organized in foreign countries (non-WTO members) or with principal place of business in foreign countries (non-WTO members)	0%	N/A
Foreign governments and government-controlled investors (WTO members)	0%	N/A

¹ The total equity percentage equals 100.1% due to rounding.

Foreign governments and government-controlled investors (non-WTO members)	0%	N/A
Funds-of-funds organized in the US and with principal place of business in the US	0%	N/A
Funds-of-funds organized in foreign countries (WTO members) and with principal place of business in foreign countries (WTO members)	0%	N/A
Funds-of-funds and mutual funds organized in foreign countries (non-WTO members) or with principal place of business in foreign countries (non-WTO members)	0%	N/A
Other – Organized in the US and have principal place of business in the US	0%	N/A
Other – Organized in foreign countries (WTO members) and have principal place of business in foreign countries (WTO members)	0%	N/A
Other – Organized in foreign countries (non-WTO members) or have principal place of business in foreign countries (non-WTO members)	0%	N/A

AP CAYMAN PARTNERS II GENERAL PARTNER, L.P.²

Category of Investor	Aggregate % Equity	Country of Citizenship/ Country of Organization/ Principal Place of Business
Individuals that are citizens of the US	47.0%	United States
Individuals that are citizens of foreign countries (WTO members)	52.1%	Japan
Individuals that are citizens of foreign countries (non-WTO members)	0%	N/A
Banks, insurance companies, pension plans, and foundations/endowments organized in the US and controlled by US citizens	0%	N/A
Banks, insurance companies, pension plans, and foundations/endowments organized in the foreign countries (WTO members) and controlled by foreign citizens (WTO members)	0%	N/A
Banks, insurance companies, pension plans, and foundations/endowments organized in foreign countries (non-WTO members) and controlled by foreign citizens (non-WTO members)	0%	N/A
Private equity funds and mutual funds organized in the US and with principal place of business in the US	0%	N/A
Private equity funds and mutual funds organized in foreign countries (WTO members) and with principal place of business in foreign countries (WTO members)	1.0%	Cayman Islands
Private equity funds and mutual funds organized in foreign countries (non-WTO members) or with principal place of business in foreign countries (non-WTO members)	0%	N/A
Foreign governments and government-controlled investors (WTO members)	0%	N/A

² The total equity percentage equals 100.1% due to rounding.

Foreign governments and government-controlled investors (non-WTO members)	0%	N/A
Funds-of-funds organized in the US and with principal place of business in the US	0%	N/A
Funds-of-funds organized in foreign countries (WTO members) and with principal place of business in foreign countries (WTO members)	0%	N/A
Funds-of-funds and mutual funds organized in foreign countries (non-WTO members) or with principal place of business in foreign countries (non-WTO members)	0%	N/A
Other – Organized in the US and have principal place of business in the US	0%	N/A
Other – Organized in foreign countries (WTO members) and have principal place of business in foreign countries (WTO members)	0%	N/A
Other – Organized in foreign countries (non-WTO members) or have principal place of business in foreign countries (non-WTO members)	0%	N/A

Exhibit 2

PRINCIPAL PLACE OF BUSINESS SHOWINGS

AP Cayman Partners II, L.P.

Principal Place of Business: *Cayman Islands*

Principal Place of Business Factors:

- (i) Country of organization: *Cayman Islands*
- (ii) Location of world headquarters: *Cayman Islands*
- (iii) Tax jurisdiction: *Cayman Islands*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States, Netherlands, Cayman Islands*
- (v) Countries from which capital has been contributed: *Australia, Belgium, Cayman Islands, Germany, Hong Kong, Ireland, Italy, Japan, Netherlands, Singapore, Switzerland, United Kingdom, United States*

AP Cayman Partners II General Partner, L.P.

Principal Place of Business: *Cayman Islands*

Principal Place of Business Factors:

- (i) Country of organization: *Cayman Islands*
- (ii) Location of world headquarters: *Cayman Islands*
- (iii) Tax jurisdiction: *Cayman Islands*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States, Japan, Cayman Islands*
- (v) Countries from which capital has been contributed: *United States, Japan, Cayman Islands*

Cayman Capital Management II, Inc.

Principal Place of Business: *Cayman Islands*

Principal Place of Business Factors:

- (i) Country of organization: *Cayman Islands*
- (ii) Location of world headquarters: *Cayman Islands*
- (iii) Tax jurisdiction: *Cayman Islands*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States*
- (v) Countries from which capital has been contributed: *United States*

Advantage Partners IV, ILP

Principal Place of Business: *Japan*

Principal Place of Business Factors:

- (i) Country of organization: *Japan*
- (ii) Location of world headquarters: *Japan*
- (iii) Tax jurisdiction: *Japan*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *Japan*
- (v) Countries from which capital has been contributed: *Japan*

AP IV GP Partnership

Principal Place of Business: *Japan*

Principal Place of Business Factors:

- (i) Country of organization: *Japan*
- (ii) Location of world headquarters: *Japan*
- (iii) Tax jurisdiction: *Japan*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States, Japan*
- (v) Countries from which capital has been contributed: *United States, Japan*

AP IV GP Co., Ltd

Principal Place of Business: *Japan*

Principal Place of Business Factors:

- (i) Country of organization: *Japan*
- (ii) Location of world headquarters: *Japan*
- (iii) Tax jurisdiction: *Japan*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States, Japan*
- (v) Countries from which capital has been contributed: *Japan*

Advantage Partners, LLP

Principal Place of Business: *Japan*

Principal Place of Business Factors:

- (i) Country of organization: *Japan*
- (ii) Location of world headquarters: *Japan*
- (iii) Tax jurisdiction: *Japan*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States, Japan*
- (v) Countries from which capital has been contributed: *United States, Japan*

Japan Ireland Investment Partners

Principal Place of Business: *Ireland*

Principal Place of Business Factors:

- (i) Country of organization: *Ireland*
- (ii) Location of world headquarters: *Ireland*
- (iii) Tax jurisdiction: *Ireland*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *Cayman Islands, Ireland*
- (v) Countries from which capital has been contributed: *Cayman Islands*

JIIP, LTD

Principal Place of Business: *Cayman Islands*

Principal Place of Business Factors:

- (i) Country of organization: *Cayman Islands*
- (ii) Location of world headquarters: *Cayman Islands*
- (iii) Tax jurisdiction: *Cayman Islands*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *Cayman Islands, Ireland*
- (v) Countries from which capital has been contributed: *Cayman Islands*

Japan Ireland Investment Partners, L.P.

Principal Place of Business: *Cayman Islands*

Principal Place of Business Factors:

- (i) Country of organization: *Cayman Islands*
- (ii) Location of world headquarters: *Cayman Islands*
- (iii) Tax jurisdiction: *Cayman Islands*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *Cayman Islands, Ireland*
- (v) Countries from which capital has been contributed: *Australia, Bermuda, British Virgin Islands, Canada, Cayman Islands, Channel Islands, Denmark, France, Guernsey, Hong Kong, Ireland, Japan, Liechtenstein, Luxembourg, Singapore, Spain, Sweden, Switzerland, United Kingdom, United States*

Japan Ireland Investment Partners, LTD

Principal Place of Business: *Cayman Islands*

Principal Place of Business Factors:

- (i) Country of organization: *Cayman Islands*
- (ii) Location of world headquarters: *Cayman Islands*
- (iii) Tax jurisdiction: *Cayman Islands*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *Cayman Islands, Ireland, Japan*
- (v) Countries from which capital has been contributed: *Japan*

AP5 Co., Ltd

Principal Place of Business: *Japan*

Principal Place of Business Factors:

- (i) Country of organization: *Japan*
- (ii) Location of world headquarters: *Japan*
- (iii) Tax jurisdiction: *Japan*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *United States, Japan*
- (v) Countries from which capital has been contributed: *Japan*

Advantage Partners Tousekumiai No. XX

Principal Place of Business: *To Be Determined*

Principal Place of Business Factors:

- (i) Country of organization: *To Be Determined / Likely Japan*
- (ii) Location of world headquarters: *To Be Determined / Likely Japan*
- (iii) Tax jurisdiction: *To Be Determined / Likely Japan*
- (iv) Citizenship or principal place of business of controlling principals, directors, and/or investment managers: *To Be Determined*
- (v) Countries from which capital has been contributed: *To Be Determined*