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BY ELECTRONIC MAIL
AND ELECTRONIC FILING

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

*Re Application to Transfer Control of the American Samoa-Hawaii Cable System,
FCC File Nos. SCL-T/C-20101022-00024, SCL-LIC-20080814-00016, and SCL-
T/C-20101022-00025; IB Docket No. 10-229*

Dear Messrs. Cooley and Sofield and Ms. Dortch:

In the above-referenced matters, eLandia International, Inc. (“eLandia”) and Amper S.A. (“Amper”) have sought consent from the Federal Communications Commission (“FCC”) to transfer control of American Samoa Hawaii Cable, LLC (“ASHC”), Samoa American Samoa Cable, LLC (“SASC”), and AST Telecom, LLC d/b/a Blue Sky Communications (“Blue Sky”) (together with ASHC and SASC, “Licensees,” together with eLandia and Amper, “Applicants”) and their jointly-held cable landing license for the American Samoa Hawaii Cable System (“ASCH Cable”) from eLandia to Amper in connection with Amper’s acquisition of a majority

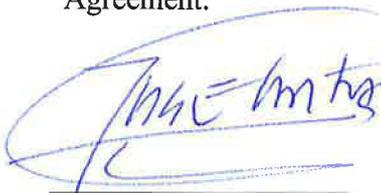
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of the outstanding shares of eLandia (the "Proposed Transaction"). In a letter dated August 6, 2010, counsel for the Licensees had previously notified the Department of Homeland Security ("DHS") of the Proposed Transaction, pursuant to Section 4.2 of the agreement by and between the Licensees and DHS executed on January 9, 2009, to address national security, law enforcement, and public safety concerns in connection with the original grant of a cable landing license for the ASH Cable by the Commission (the "Security Agreement").

Subject to receipt of all necessary U.S. and regulatory approvals by no later than early February 2011, the Applicants expect to consummate the Proposed Transaction in early March 2011. Thereafter, eLandia will continue to operate as a majority-owned subsidiary of Amper. Amper will indirectly control the Licensees, which will retain their existing American Samoa-based management.

The Applicants have negotiated revisions to the Security Agreement (the "Revised Security Agreement") with DHS and DOJ. By executing that Revised Security Agreement, the Licensees confirm their commitment to abide by the terms of the Revised Security Agreement and reaffirm that they will remain parties to the Revised Security Agreement upon consummation of the Proposed Transaction. The Licensees also affirm that they will continue to hold jointly the cable landing license for the ASH Cable until they obtain FCC consent for any future substantial assignment or transfer of control beyond the Proposed Transaction. Amper and eLandia understand the commitments made by the Licensees in the Security Agreement and reaffirm that the Licensees will continue to abide by those commitments following the consummation of the Proposed Transaction.

The Applicants understand that the Licensees' compliance with the Revised Security Agreement will serve a condition of the cable landing license for the ASH Cable. The Applicants therefore request that the FCC condition consent to the transfer of control of the cable landing license for the ASH Cable upon the Licensees' compliance with the Revised Security Agreement.



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Respectfully submitted,

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Attachment

cc: Richard Hagar (DHS)
David Krech (FCC/IB)
Kent Bressie