

**COPY**

WILKINSON ) BARKER ) KNAUER ) LLP

2300 N STREET, NW  
SUITE 700  
WASHINGTON, DC 20037  
TEL 202.783.4141  
FAX 202.783.5851  
www.wbklaw.com

ZACHARY A. ZEHNER  
(202) 383-3424  
zzehner@wbklaw.com

April 12, 2002

William F. Caton, Acting Secretary  
Federal Communications Commission  
1270 Fairfield Road  
Gettysburg PA 17325-7245

Re: Pacific Telecom Inc.  
FCC Ownership Disclosure Information for the Wireless  
Telecommunications Services (FCC Form 602)

Dear Mr. Caton:

Pursuant to Section 1.919 of the Commission's rules, 47 C.F.R. § 1.919, Pacific Telecom Inc. hereby files an FCC Ownership Disclosure Information for the Wireless Telecommunications Services (FCC Form 602). This FCC Form 602 is being filed in conjunction with the electronic filing on April 11, 2002 of FCC Form 603 for the transfer of control of the licensee of Station KNKN616 in the Cellular Radio Service to Pacific Telecom Inc. as transferee.

The enclosed Form 602 includes a facsimile signature. Upon receipt of the original signature, Pacific Telecom Inc. will re-file the instant Form 602.

Please contact the undersigned should you have any questions concerning this submission.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Zachary A. Zehner

Enclosure

\* Practice limited to matters before federal courts and agencies.

4/18/2



Applicant Licensee Information

1) First Name (if individual):	MI:	Last Name:	Suffix:
2) Applicant Name (if entity): Pacific Telecom Inc. ("PTI")		3) FCC Registration Number (FRN): 0006-2435-54	

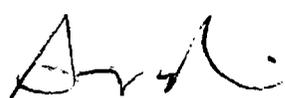
Related FCC Regulated Businesses of Applicant Licensee

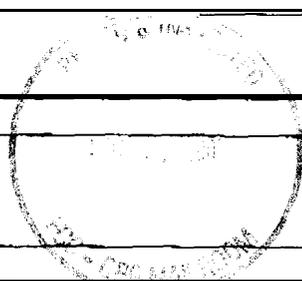
4a) Name and address of all FCC Regulated Businesses owned by Applicant/ Licensee (use additional sheets, if necessary):	4b) Principal Business:	4c) FCC Registration Number (FRN):	4d) Percent of Interest Held:
The Micronesian Telecommunications Corp. ("MTC") PO Box 500306, Saipan, MP 96950	Communications Investment	0004-3502-52	100%
GTE Pacific B Inc. PO Box 500306, Saipan, MP 96950	Communications	0004-3399-33	100%

Signature

5) Typed or Printed Name of Party Authorized to Sign

First Name: George	MI:	Last Name: Chiu	Suffix:
Title: Director and Authorized Representative			

Signature: 	Date: 4-10-02
---	------------------



Failure to Sign This Application May Result in Dismissal of The Application And Forfeiture Of Any Fees Paid

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1) AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).**

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Prospector Investment Holdings Inc. ("Prospector")		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: c/o Trident Trust (Cayman) Ltd., One Capitol Place, P.O. Box 847 Grand Cayman, B.W.I.			
5) Type of Interest in Applicant (I) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( C (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 50%	
8) Disclosable Interest Holders Type of Ownership (C) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting		9) Disclosable Interest Holder's Country of Citizenship: British West Indies	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; Prospector holds 50% of PTI. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	IIb) Principal Business:	IIc) FCC Registration Number (FRN):	1 Id) Percent of Interest Held:

Schedule for Disclosable interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Missouri Holdings Corp.		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: P.O. Box 500712, Saipan, MP 96950			
5) Type of Interest in Applicant (I) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): (C) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 20%	
8) Disclosable Interest Holder's Type of Ownership (C) (refer to instructions for list):  (X) Voting ( ) Non-Voting		9) Disclosable Interest Holder's Country of Citizenship: USA/CNMI	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): WTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; Missouri Holdings Corp. holds 20% of PTI. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

1(a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	1(b) Principal Business:	1(c) FCC Registration Number (FRN):	1(d) Percent of Interest Held:

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual): Ricardo	MI: C.	Last Name: Delgado	Suffix:
2) Disclosable Interest Holder's Name (if entity):		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: 4/F SGV II Building, 6758 Ayala Ave., Makati City, Philippines			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( I ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 30%	
8) Disclosable interest Holder's Type of Ownership (C) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting		9) Disclosable Interest Holders Country of Citizenship: Philippines	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; Prospector holds 50% of PTI; Ricardo Delgado holds 60% of Prospector. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

I(a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	I(b) Principal Business:	I(c) FCC Registration Number (FRN):	I(d) Percent of Interest Held:

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual): Jose	MI: Ricardo	Last Name: Delgado	Suffix:
2) Disclosable Interest Holder's Name (if entity):		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: 4/F SGV II Building, 6758 Ayala Ave., Makati City, Philippines			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( I ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 20%	
8) Disclosable Interest Holder's Type of Ownership (C) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting		9) Disclosable Interest Holder's Country of Citizenship: Philippines	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; Prospector holds 50% of PTI; Jose Delgado holds 40% of Prospector. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

I(a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	I(b) Principal Business:	I(c) FCC Registration Number (FRN):	I(d) Percent of Interest Held:

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holders Name (if entity): Tan Holdings Corp.		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: Attn: Jerry Tan P.O. Box 501280, Saipan, MP 96950			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( C ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 30%	
8) Disclosable Interest Holder's Type of Ownership (C) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting	9) Disclosable Interest Holder's Country of Citizenship: USA/CNMI		
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; THC holds 30% of PTI; Tan Holdings Corp. holds 100% of THC. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	11b) Principal Business:	11c) FCC Registration Number (FRN):	11d) Percent of Interest Held:

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual): Michael	MI: Kai	Last Name: Leung	Suffix:
2) Disclosable Interest Holder's Name (if entity):		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: P.O. Box 500712 Saipan, MP 96950			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( I ) (refer to instructions for list of codes):	7) Percent of interest Held in Applicant: 20%	
8) Disclosable Interest Holder's Type of Ownership (C) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting		9) Disclosable Interest Holder's Country of Citizenship: USA/CNMI	
10) Relationship Description (if the discloseable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; Missouri Holdings Corp. holds 20% of PTI; Michael Kai Leung holds 100% of Missouri Holdings Corp. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	IIb) Principal Business:	IIc) FCC Registration Number (FRN):	IId) Percent of Interest Held:

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual): Siu	MI: Lin	Last Name: Tan	suffix:
2) Disclosable Interest Holder's Name (if entity):		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: P.O. Box 501280, Saipan, MP 96950			
5) Type of Interest in Applicant ( 1 ) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( 1 ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 30%	
8) Disclosable Interest Holder's Type of Ownership (0) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting		9) Disclosable Interest Holder's Country of Citizenship:  USA	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; THC holds 30% of PTI; Tan Holdings Corp. holds 100% of THC; Siu Lin Tan as trustee controls 100% of Tan Holdings Corp. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	11b) Principal Business:	11c) FCC Registration Number (FRN):	11d) Percent of Interest Held:

Schedule for Disclosable Interest Holders

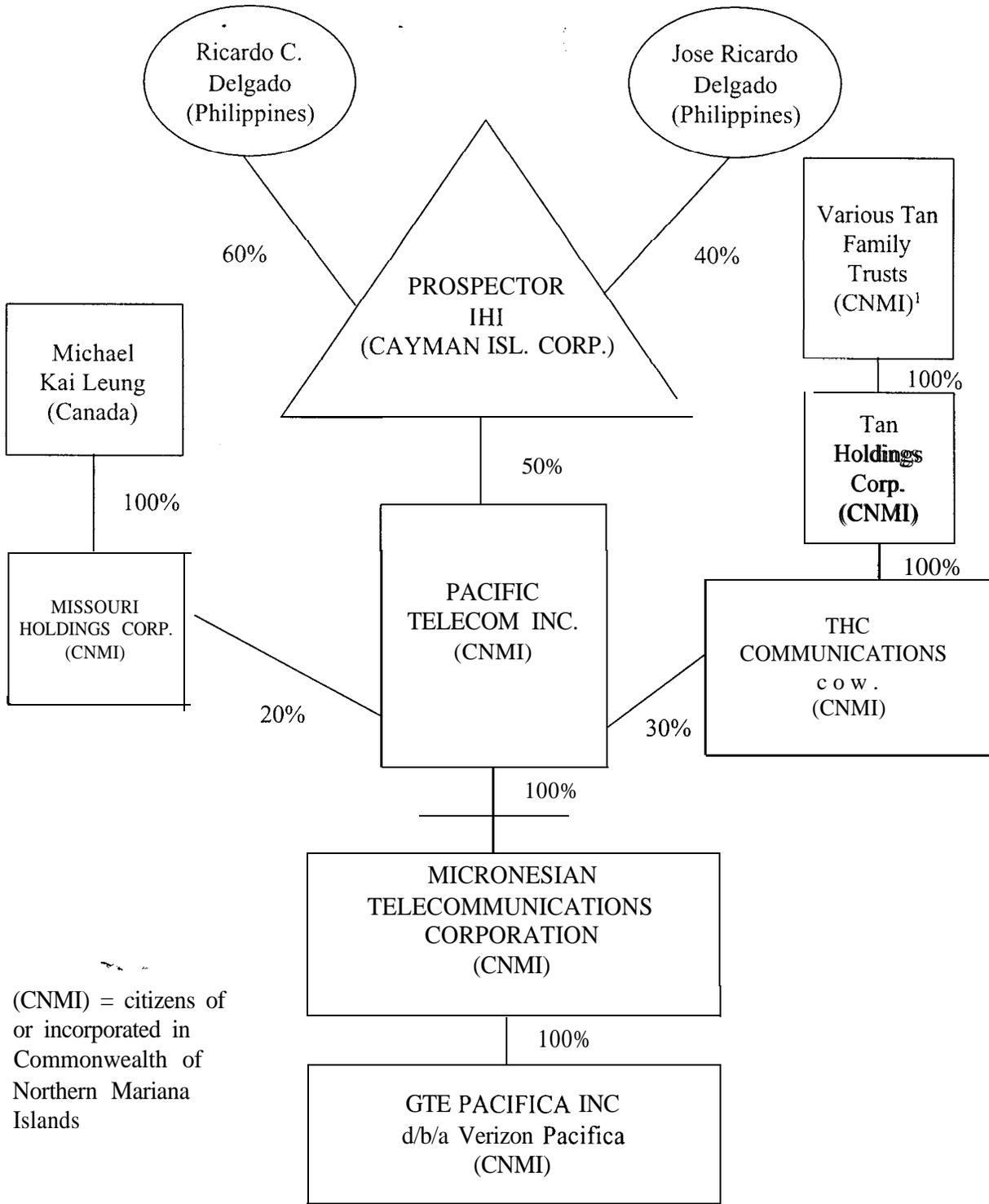
**Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)**

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): THC Communications Corp. ("THC")		3) FCC Registration Number(FRN):	
4) Disclosable Interest Holder's Address: P.O. Box 501280, Saipan, MP 96950			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list):	6) Disclosable Interest Holder is a (n): ( C ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 30%	
8) Disclosable Interest Holder's Type of Ownership (C) (refer to instructions for list):  ( X ) Voting ( ) Non-Voting		9) Disclosable Interest Holder's Country of Citizenship: USA/CNMI	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): MTC holds 100% of GTE Pacifica Inc.; PTI holds 100% of MTC; THC holds 30% of PTI. (See exhibit).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

I1a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in Item 1 or 2 (use additional sheets, if necessary):	I1b) Principal Business:	I1c) FCC Registration Number (FRN):	I1d) Percent of Interest Held:

# PACIFIC TELECOM INC. OWNERSHIP STRUCTURE



<sup>1</sup> See *Petition for Declaratory Ruling Under Section 310(b)(4)* for description of 7 percent foreign (WTO) beneficiaries (2.1 percent diluted foreign interest in Pacific Telecom Inc.).