SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 295-8478
WWW.SWIDLAW.COM

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
TEL.(212) 973-0111
FAX (212) 891-9598

February 24, 2003

FILED ELECTRONICALLY

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

Re: In re Global Crossing Ltd. (Debtor-in-Possession), IB Docket No. 02-286
Response to the Commission's Letter dated February 14, 2003

Dear Secretary Dortch:

Global Crossing Ltd. ("GCL") and GC Acquisition Limited ("New GX" and, together with GCL, "Applicants") submit this letter in response to the Commission's letter of February 14, 2003, to clarify their responses to the Commission's further information requests of January 23, 2003.[1] The need for these clarifications was discussed among Applicants' counsel and the Commission's staff during a telephone call on February 14, 2003, which was conducted pursuant to Section 1.1204(a)(10) of the Commission's Rules, 47 C.F.R. § 1.1204(a)(10). This letter also amends other factual statements in the February 6 letter.

Applicants amend their response to the Commission's first information request of January 23 to correct minor mathematical errors. On page 3 of the February 6 letter, Applicants stated that non-U.S. Class C creditors from WTO Members were "believed to hold in the aggregate approximately 30.9984% of the Class C Claims." The correct percentage is 30.7599%. In a subsequent paragraph, Applicants stated that those creditors would receive in the aggregate 1.6603% of the common stock of New GX. The correct percentage is 1.8456%. Applicants also attach a revised copy of Exhibit 1A. Revised Exhibit 1A reflects the above changes and provides subtotals for the Class C Claims held by the WTO Member creditors and those creditors whose nationality could not be determined by Applicants, as well as the amount of New GX common stock expected to be obtained by those creditors.

On page 5 of the letter, Applicants round the percentages stated in the last paragraph -- 0.08129% and 0.01093% -- to four decimal places (0.0813% and 0.0109%, respectively) to be

---

[1] *See* Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Feb. 6, 2003.

consistent with the other percentages stated in the letter.[2] Applicants attach revised Exhibit 1D, which also rounds all percentages to four decimal places and provides subtotals for the Class F Claims held by WTO and non-WTO creditors and the amount of New GX common stock expected to be obtained by those creditors.

Additionally, Applicants amend their response to the Commission's second information request of January 23 to correct an error. Applicants' February 6 letter stated that "Li Ka-Shing Unity Trustee Company Limited ('TUT'), as trustee of The Li Ka-Shing Unity Trust (the 'LKS Unity Trust'), and companies controlled by TUT as trustee of the LKS Unity Trust (the 'Li Family Trusts') beneficially hold a combined 37.05% interest in CKHL."[3] The percentage stated in that sentence is incorrect. As indicated by the Declaration of Steven P. Allen, Group Senior Legal Counsel, Hutchison Whampoa Ltd. ("HWL"), which was appended to Applicants' February 6 letter as Exhibit 2 ("Declaration of Steven P. Allen"), the correct percentage is 33.32%.[4]

Finally, Applicants have been advised by Hutchison Telecommunications Ltd. that there were errors in certain information provided in the Declaration of Steven P. Allen. These errors are described in and corrected by the Supplemental Declaration of Steven P. Allen, dated February 24, 2003, which is appended hereto.

Please do not hesitate to contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

Paul O. Gagnier /mzc

Jean L. Kiddoo
Paul O. Gagnier
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Tel: 202-424-7500
Fax: 202-424-7645

Counsel for Global Crossing Ltd.
and GC Acquisition Limited

Attachments

cc: Paul Kouroupas (Global Crossing Ltd.)
Phillip Spector (Paul, Weiss, Rifkind, Wharton & Garrison)
Teresa Baer (Latham & Watkins)

---

[2] In the February 6 letter, Applicants rounded those percentages and the percentages stated in Exhibit 1D to five decimal places because several of the Class F Claims are so small that rounding to four decimal places appears to result in ownership interests in New GX of zero percent.

[3] Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Feb. 6, 2003, at 8.

[4] Declaration of Steven P. Allen at 3, n. 8.

Revised Exhibit 1A to February 6, 2003 Letter

Exhibit 1A (Revised)

Information Regarding Non-U.S. Class C Creditors

COUNTRY	WTO MEMBER	TOTAL ESTIMATED CLASS C CLAIMS FOR COUNTRY	ESTIMATED PERCENTAGE OF TOTAL CLASS C CLAIMS	ESTIMATED PERCENTAGE OF NEW GX COMMON STOCK
Bahrain	Yes	7,343,439	0.3249%	0.0195%
Canada	Yes	23,531,758	1.0411%	0.0625%
China	Yes	2,447,813	0.1083%	0.0065%
France	Yes	78,845,771	3.4884%	0.2093%
Germany	Yes	420,533,534	18.6056%	1.1163%
Israel	Yes	7,343,439	0.3249%	0.0195%
Netherlands	Yes	89,201,502	3.9465%	0.2368%
Switzerland	Yes	15,326,639	0.6781%	0.0407%
Taiwan	Yes	17,571,757	0.7774%	0.0466%
United Kingdom	Yes	33,107,495	1.4648%	0.0879%
SUB-TOTAL WTO MEMBERS		695,253,147	30.7599%	1.8456%
Nationality Unidentified	Unknown	69,788,288	3.0876%	0.1853%
TOTAL WTO MEMBERS AND UNIDENTIFIED		765,041,435	33.8475%	2.0309%

Revised Exhibit 1D to February 6, 2003 Letter

EXHIBIT 1D (Revised)

Information Regarding Non-U.S. Class F Creditors

COUNTRY	WTO MEMBER	TOTAL ESTIMATED CLASS F CLAIMS FOR COUNTRY	ESTIMATED PERCENTAGE OF TOTAL CLASS F CLAIMS	ESTIMATED PERCENTAGE OF NEW GX COMMON STOCK
Australia	Yes	1,475,963	0.0021%	0.0001%
Bahrain	Yes	5,228,125	0.0075%	0.0003%
Belgium	Yes	4,517,157	0.0064%	0.0002%
Brazil	Yes	877,713	0.0013%	0.0000%
Canada	Yes	22,779,027	0.0325%	0.0012%
Colombia	Yes	185,378	0.0003%	0.0000%
Denmark	Yes	813,932	0.0012%	0.0000%
France	Yes	433,532,269	0.6185%	0.0237%
Germany	Yes	44,127,715	0.0630%	0.0024%
Israel	Yes	14,149,142	0.0202%	0.0008%
Italy	Yes	702,714,869	1.0025%	0.0384%
Japan	Yes	2,729,760	0.0039%	0.0001%
Mexico	Yes	290,838	0.0004%	0.0000%
Netherlands	Yes	15,190,407	0.0217%	0.0008%
New Zealand	Yes	219,156	0.0003%	0.0000%
Panama	Yes	4,192,883	0.0060%	0.0002%
Peru	Yes	752,345	0.0011%	0.0000%
Slovak Republic	Yes	1,624,508	0.0023%	0.0001%
Sweden	Yes	4,047,165	0.0058%	0.0002%
Switzerland	Yes	397,345	0.0006%	0.0000%
United Kingdom	Yes	27,885,968	0.0398%	0.0015%
Venezuela	Yes	176,404	0.0003%	0.0000%
SUB-TOTAL WTO MEMBERS		1,287,908,069	1.8373%	0.0704%
Bahamas	No	200,000,000	0.2853%	0.0109%
TOTAL WTO AND NON-WTO MEMBERS		1,487,908,069	2.1226%	0.0813%

Supplemental Declaration of Steven P. Allen
Group Senior Legal Counsel, Hutchison Whampoa Ltd.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
GROUP SENIOR LEGAL COUNSEL, HUTCHISON WHAMPOA LTD.
FEBRUARY 24, 2003

1. My name is Steven P. Allen. I am Group Senior Legal Counsel of Hutchison Whampoa Ltd. ("HWL"). I understand that the Federal Communications Commission (the "FCC" or "Commission") has requested Global Crossing Ltd. (Debtor-in-Possession) and GC Acquisition Ltd. (together, "Applicants") to provide clarification regarding information presented in my declaration dated February 6, 2003.[1] I have prepared this supplemental declaration in response to the Commission's request.

Revised Exhibits

2. I have carefully reviewed all of the information that was used to prepare my February 6 Declaration, and have made additional inquiries to relevant persons. From this supplemental due diligence, I have learned the following:

(a) My February 6 Declaration overstated the direct shareholdings of HSBC Nominees (Hong Kong) Limited ("HSBC") in each of HWL and Cheung Kong (Holdings) Limited ("CKHL"). HKSCC Nominees Limited ("HKSCC") holds several hundred million shares of each of HWL and CKHL as nominee for The Hongkong and Shanghai Banking Corporation Ltd., which in turn holds the shares for HSBC.[2] Because I was unaware of this overlap of the shareholdings of HKSCC and HSBC, and relied on the total shareholdings reported to me by HSBC, my February 6 Declaration double counted hundreds of millions of shares, and thereby overstated the direct shareholdings of HSBC in each of HWL and CKHL.[3] Letters from HSBC noting the overlapping interests are appended hereto as Exhibit III.[4]

---

1 *See* Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Feb. 6, 2003, Declaration of Steven P. Allen, Group Senior Legal Counsel, HWL, dated Feb. 6, 2003 ("February 6 Declaration").

2 The Hongkong and Shanghai Banking Corporation Ltd. is an affiliate of HSBC.

3 In Applicants' December 18 letter to the Commission, Applicants stated that "[a]pproximately 66.76% of HWL's shares are held directly by" HSBC and HKSCC. Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Dec. 18, 2002, at 9. This statement was accurate as at December 18, 2002, and was not subject to double counting because the information was based on HWL's share register and not information reported by HSBC or HKSCC.

4 In originally reporting its total shareholdings, HSBC did not indicate that its reported shareholdings aggregated the shares it held directly and the shares it held indirectly through HKSCC. *See* February 6 Declaration, Exhibit III, Letter from HSBC to HWL, dated Jan. 29, 2003, Letter from HSBC to CKHL, dated Jan. 29, 2003.

(b) My February 6 Declaration was based on the erroneous assumption that Taiwan is not a member of the World Trade Organization ("WTO"). The Separate Customs Territory of Taiwan became a member of the WTO on January 1, 2002.[5]

3. I have revised Exhibits I, II, IV, and V to my February 6 Declaration to eliminate the foregoing errors. To avoid double counting shares, I revised Exhibits IV and V by treating HWL and CKHL shares held by HKSCC as nominee for The Hongkong and Shanghai Banking Corporation Ltd. as HSBC shares, and not as HKSCC shares.[6] Furthermore, I have revised Exhibits I, II, IV, and V using information obtained for a common record date. This common record date is January 28, 2003.[7] The revised exhibits are appended hereto as Exhibits I, II, IV, and V,[8] thereby following the same numbering scheme used for my February 6 Declaration.

Directors' Interests

4. I would also like to take this opportunity to provide clarification about the interest in HWL attributable to HWL's directors, and the interest in CKHL attributable to CKHL's directors. Applicants previously reported directors' interests to the Commission on December 18, 2002.[9] There is an overlap between directors' interests and

---

[5] *See* <http://www.wto.org> (last visited Feb. 20, 2003). As further clarification to my February 6 Declaration, I note that I have used the term "WTO Members" to mean WTO member nations and territories of WTO member nations.

[6] The share totals in revised Exhibits IV and V are consistent with the share registers of HWL and CKHL, as at the record date of January 28, 2003, subject to very small discrepancies that are believed to be due to delays in recording share transactions.

[7] My February 6 Declaration did not use a common record date for the information obtained from HWL, CKHL, HKSCC, and HSBC. By choosing a common record date for the information presented in this supplemental declaration, I have attempted to ensure that the information provides a complete and accurate snap-shot of the relevant shareholdings. The record date was chosen as a matter of convenience; it happens to be the record date used by HSBC in responding to the initial requests for information in January 2003. *See* February 6 Declaration, Exhibit III, Letter from HSBC to HWL, dated Jan. 29, 2003, Letter from HSBC to CKHL, dated Jan. 29, 2003.

[8] Except as otherwise stated in this supplemental declaration, the methodology that I used to prepare the information in the exhibits is exactly as described in my February 6 Declaration.

[9] *See* Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Dec. 18, 2002, at 9-10.

interests attributable to the Li family.[10] This overlap exists because Mr. Li Ka-shing and Mr. Victor Li are directors of HWL and CKHL and, of course, are also members of the Li family.[11]

5. To avoid any confusion about directors' interests, I have prepared two exhibits which provide a breakdown of directors' interests and the Li family's interests in HWL and CKHL. The exhibits are appended hereto as Exhibit VI and VII. Subject to very small changes in the interests attributable to HWL's and CKHL's directors,[12] all of the information in Exhibits VI and VII was previously provided to the Commission.

* * *

---

[10] Consistent with my February 6 Declaration, I assume here that the Li family is comprised of the following individuals: Mr. Li Ka-shing, Mr. Li Tzar Kuoi, Victor (Mr. Victor Li), Mr. Victor Li's wife and daughters, and Mr. Li Tzar Kai, Richard. *See* February 6 Declaration at 3, n. 7.

[11] As stated in Applicants' Application, Mr. Li Ka-shing is Chairman of both HWL and CKHL, and Mr. Victor Li is Deputy Chairman and Executive Director of HWL, and Deputy Chairman and Managing Director of CKHL. *See* Application For Consent To Transfer Control And Petition For Declaratory Ruling, filed by Applicants on Aug. 22, 2002, at 10, n. 19.

[12] These very small changes are due to recent share trading, and the re-calculation of directors' interests to clarify the overlap between directors' interests and the Li family interests.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on February 24, 2003.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT I

EXHIBIT I

HWL — SUMMARY OF SHARE REGISTER
(As at Record Date of January 28, 2003)

	Number of Shareholders	Number of Shares	% Interest in HWL
Shareholders From Hong Kong:			
Individual Shareholders	15,525	146,525,450	3.437%
Entity Shareholders[*]	371	4,110,271,543	96.409%
Shareholders From WTO Members Other Than Hong Kong[**]			
Individual Shareholders	691	6,158,016	0.144%
Entity Shareholders	60	411,121	0.010%
Shareholders From Non-WTO Members[***]			
Individual Shareholders	2	4,650	0.000%
Entity Shareholders	0	0	0%
TOTAL	**16,649**	**4,263,370,780**	**100%**

---

[*] This includes HSBC and HKSCC.

[**] The represented WTO Members are as follows: Austria, Australia, Bermuda, Canada, Cayman Islands, Fiji, France, India, Ireland, Japan, Malaysia, Macau, Malta, Nigeria, New Zealand, Panama, People's Republic of China, Panama, Philippines, Portugal, Singapore, South Korea, Spain, Sri Lanka, Sweden, Switzerland, Taiwan, Thailand, United Arab Emirates, United States of America, and United Kingdom.

[***] The represented non-WTO Members are as follows: Bahamas and Monaco.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT II

EXHIBIT II

CKHL — SUMMARY OF SHARE REGISTER
(As at Record Date of January 28, 2003)

	Number of Shareholders	Number of Shares	% Interest in CKHL
Shareholders From Hong Kong:			
Individual Shareholders	7,762	67,822,373	2.928%
Entity Shareholders[*]	252	2,246,538,420	96.994%
Shareholders From WTO Members Other Than Hong Kong[**]			
Individual Shareholders	181	1,720,177	0.074%
Entity Shareholders	11	83,368	0.004%
Shareholders From Non-WTO Members			
Individual Shareholders	0	0	0%
Entity Shareholders	0	0	0%
TOTAL	**8,206**	**2,316,164,338**	**100%**

---

[*] This includes HSBC and HKSCC.

[**] The represented WTO Members are as follows: Australia, Canada, Cayman Islands, France, Guyana, Liechtenstein, Macau, Malaysia, New Zealand, People's Republic of China, Philippines, Singapore, Taiwan, Thailand, United States of America, and United Kingdom.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT III

HSBC

Ref: CNC/RSA/LI

21 February 2003

PRIVATE & CONFIDENTIAL
The Company Secretary
Hutchison Whampoa Limited
22nd Floor Hutchison House
10 Harcourt Road
Hong Kong
Fax no. 21281770

Dear Madam,

Securities (Disclosure of Interests) Ordinance Section 18 Chapter 396: Interests in Hutchison Whampoa Limited ("Company")

Further to our letter dated 29 January 2003 and subsequent telephone conversation, we are pleased to advise that the shares are held by HSBC in our capacity as nominee for our customers and registered in names of HSBC Nominees (Hong Kong) Limited and HKSCC Nominees Limited as follows:

Physical shares registered in name of HSBC Nominees (Hong Kong) Limited	1,395,658,432
Shares registered in name of HKSCC Nominees Limited	333,108,184
Total	1,728,766,616

We shall be grateful if you would forward us a cheque in favour of The Hongkong and Shanghai Banking Corporation Limited for HKD300.00 being reimbursement of our administration fees for the above information.

Yours faithfully

Herman Li
OIC Reconciliation/Stock/Audit

The Hongkong and Shanghai Banking Corporation Limited
Custody and Clearing, Hong Kong Office:
35/F and 36/F, Sun Hung Kai Centre, 30 Harbour Road, Wan Chai, Hong Kong
Tel: 2500 3333 Fax: (852) 2845 5802 Telex: 73205 HSBCHX Telegrams: Hongbank Hongkong

HSBC

Ref: CNC/RSA/LI

21 February 2003

PRIVATE & CONFIDENTIAL
The Company Secretary
Cheung Kong (Holdings) Limited
7-12/F Cheung Kong Centre
2 Queen's Road, Central
Hong Kong
Fax no. 21281770

Dear Madam,

Securities (Disclosure of Interests) Ordinance Section 18 Chapter 396: Interests in Cheung Kong (Holdings) Limited ("Company")

Further to our letter dated 29 January 2003 and subsequent telephone conversation, we are pleased to advise that the shares are held by HSBC in our capacity as nominee for our customers and registered in names of HSBC Nominees (Hong Kong) Limited and HKSCC Nominees Limited as follows:

Physical shares registered in name of HSBC Nominees (Hong Kong) Limited	348,761,070
Shares registered in name of HKSCC Nominees Limited	313,547,429
Total	662,308,499

We shall be grateful if you would forward us a cheque in favour of The Hongkong and Shanghai Banking Corporation Limited for HKD300.00 being reimbursement of our administration fees for the above information.

Yours faithfully

Herman Li
OIC Reconciliation/Stock/Audit

The Hongkong and Shanghai Banking Corporation Limited
Custody and Clearing, Hong Kong Office:
35/F and 36/F, Sun Hung Kai Centre, 30 Harbour Road, Wan Chai, Hong Kong
Tel: 2500 3333 Fax: (852) 2845 5802 Telex: 73205 HSBC FOX Telegrams: Hongbank Hongkong

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT IV

EXHIBIT IV

HWL — NOMINEES' LIST OF PARTICIPANTS*

(As at Record Date of January 28, 2003)

	Number of Participants	Number of Shares	% Interest in HWL
Participants From Hong Kong:**			
HSBC Participants	10,099	1,102,314,418	25.855%
HKSCC Participants	2,233	1,115,334,690	26.161%
Participants From WTO Members Other Than Hong Kong***			
HSBC Individual Participants	882	5,360,501	0.126%
HSBC Entity Participants	591	621,079,697	14.568%
HKSCC Participants	0	0	0%
Participants From Non-WTO Members****			
HSBC Individual Participants	2	12,000	0.000%
HSBC Entity Participants	0	0	0%
HKSCC Participants	0	0	0%
TOTAL	**13,807**	**2,844,101,306**	**66.710%**

---

* These are persons (individuals and entities) who hold shares in HWL indirectly through HSBC and HKSCC. To avoid double counting shares, this table treats shares held by HKSCC as nominee for The Hongkong and Shanghai Banking Corporation Ltd. (an affiliate of HSBC) as HSBC shares, and not as HKSCC shares. The total number of issued shares of HWL is 4,263,370,780.

** HSBC and HKSCC did not provide information sufficient to distinguish readily between individual and entity participants from Hong Kong.

*** The represented WTO Members are as follows: Australia, Bahrain, Belgium, Brazil, Brunei Darussalam, Canada, Costa Rica, Cyprus, Denmark, Fiji, Finland, France, Germany, India, Indonesia, Ireland, Italy, Jamaica, Japan, Luxembourg, Macau, Madagascar, Malaysia, Mauritius, Netherlands, New Zealand, Norway, Oman, Papua New Guinea, Norway, Paraguay, People's Republic of China, Philippines, Portugal, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, Taiwan, Thailand, Turkey, United States of America, United Kingdom, and United Arab Emirates.

**** The represented non-WTO Members are as follows: Saudi Arabia and Vanuatu.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT V

EXHIBIT V

CKHL — NOMINEES' LIST OF PARTICIPANTS*

(As at Record Date of January 28, 2003)

	Number of Participants	Number of Shares	% Interest in CKHL
Participants From Hong Kong:**			
HSBC Participants	5,149	66,803,430	2.884%
HKSCC Participants	1,281	677,434,351	29.248%
Participants From WTO Members Other Than Hong Kong***			
HSBC Individual Participants	508	2,628,685	0.113%
HSBC Entity Participants	438	592,762,384	25.592%
HKSCC Participants	0	0	0%
Participants From Non-WTO Members****			
HSBC Individual Participants	3	104,000	0.004%
HSBC Entity Participants	1	10,000	0.000%
HKSCC Participants	0	0	0%
TOTAL	**7,380**	**1,339,742,850**	**57.843%**†

---

* These are persons (individuals and entities) who hold shares in CKHL indirectly through HSBC and HKSCC. To avoid double counting shares, this table treats shares held by HKSCC as nominee for The Hongkong and Shanghai Banking Corporation Ltd. (an affiliate of HSBC) as HSBC shares, and not as HKSCC shares. The total number of issued shares of CKHL is 2,316,164,338.

** HSBC and HKSCC did not provide information sufficient to distinguish readily between individual and entity participants from Hong Kong.

*** The represented WTO Members are as follows: Australia, Austria, Belgium, Brunei Darussalam, Canada, Denmark, France, Germany, India, Indonesia, Ireland, Italy, Japan, Luxembourg, Macau, Malaysia, Mauritius, Netherlands, New Zealand, Papua New Guinea, Paraguay, People's Republic of China, Philippines, Singapore, South Africa, South Korea, Sweden, Switzerland, Taiwan, Thailand, Turkey, United States of America, and United Kingdom.

**** The represented non-WTO Members are as follows: Bahamas, Cambodia, and Vanuatu.

† Due to rounding, this total percentage is not exactly equal to the sum of the percentage interests. The total percentage was calculated using the total number of shares presented in the table and the total number of issued shares referenced in footnote *.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT VI

EXHIBIT VI

HWL — BENEFICIAL INTERESTS OF THE DIRECTORS AND THE LI FAMILY*

Beneficial Interest Holder	% Interest In HWL
Mr. Li Ka-shing and Mr. Victor Li	0.30%
HWL's Directors (Other Than Mr. Li Ka-shing and Mr. Victor Li)**	0.46%
TOTAL	**0.76%**

---

* The interests reported here exclude any interests arising from attributable interests in CKHL.

** All of these directors are citizens of Canada, Hong Kong, or the United Kingdom, each of which is a WTO Member. *See* Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Dec. 18, 2002, at 9. The interest reported here is updated from information previously provided to the Commission by Applicants. *Id.* Mr. Li Ka-shing and Mr. Victor Li are directors of HWL. *See* Application For Consent To Transfer Control And Petition For Declaratory Ruling, filed by Applicants on Aug. 22, 2002, at 10, n. 19.

SUPPLEMENTAL DECLARATION OF STEVEN P. ALLEN
FEBRUARY 24, 2003

EXHIBIT VII

EXHIBIT VII

CKHL — BENEFICIAL INTERESTS OF THE DIRECTORS AND THE LI FAMILY

Beneficial Interest Holder	% Interest In CKHL	
Li Family		
Li Family Trusts[*]	33.32%	
Mr. Li Ka-shing, Mr. Victor Li, and Mr. Victor Li's Wife[**]	3.73%	
Subtotal		37.05%
CKHL's Directors (Other Than Mr. Li Ka-shing and Mr. Victor Li)[***]		0.06%
TOTAL		**37.11%**

---

[*] This interest includes Li Ka-Shing Unity Trustee Company Limited ("TUT"), as trustee of The Li Ka-Shing Unity Trust (the "LKS Unity Trust"), and companies controlled by TUT as trustee of the LKS Unity Trust (the "Li Family Trusts"). *See* February 6 Declaration at 3, n. 8.

[**] This interest is held individually either directly or indirectly through entities separate from the Li Family Trusts, and is not attributable to TUT or the LKS Unity Trust. *See* February 6 Declaration at 3, n. 8.

[***] All of these directors are citizens of Canada, Hong Kong, or the United Kingdom, each of which is a WTO Member. *See* Letter from Paul O. Gagnier, Counsel for Applicants, to Marlene H. Dortch, Secretary, FCC, dated Dec. 18, 2002, at 10. The interest reported here is updated from information previously provided to the Commission by Applicants. *Id.* Mr. Li Ka-shing and Mr. Victor Li are directors of CKHL. *See* Application For Consent To Transfer Control And Petition For Declaratory Ruling, filed by Applicants on Aug. 22, 2002, at 10, n. 19.

CERTIFICATE OF SERVICE

I, Ruth W. Moroz, hereby certify that on this 24th day of February, 2003, I caused a true and correct copy of the foregoing letter to be served upon the following parties in the manner indicated:

Qualex International
By E-Mail: qualexint@aol.com

J. Breck Blalock
By E-Mail: bblalock@fcc.gov

Susan O'Connell
By E-Mail: mailto:soconnel@fcc.gov

Kathleen Collins
By E-Mail: kcollins@fcc.gov

Henry Thaggert
By E-Mail: hthagger@fcc.gov

Zenji Nakazawa
By E-Mail: znakazaw@fcc.gov

Neil Dellar
By E-Mail: ndellar@fcc.gov

James Ball
By E-Mail: jball@fcc.gov

William Malone, Esq.
Gerald Lavery Lederer, Esq.
James R. Hobson, Esq.
Miller & Van Eaton, P.L.L.C
By E-Mail: wmalone@millervaneaton.com

John G. Malcolm, Esq.
Deputy Assistant Attorney General
Criminal Division
United States Department of Justice
10th Street & Constitution Avenue, N.W.
Washington, D.C. 20530
By First Class Mail

Patrick W. Kelley, Esq.
Deputy General Counsel
Federal Bureau of Investigation
935 Pennsylvania Avenue, N.W.
Washington, D.C. 20535
By First Class Mail

Debbie Goldman
Louise Novotny
Communications Workers of America
By E-Mail: debbie@cwa-union.org

Karl W. B. Schwarz
GlobalAxxess
By E-Mail: kw.schwarz@worldnet.att.net

Julian P. Gehman, Esq.
Mayer, Brown, Rowe & Maw
By Email: jgehman@mayerbrownrowe.com

Ruth W. Moroz

Ruth W. Moroz