



Philippine Bank of Communications

6795 Ayala Avenue corner V. A. Rufino St. Makati, Philippines

Telephone No. 8307000

16 April 2012

**Philippine Stock Exchange, Inc.
3/F Makati Stock Exchange Plaza
Ayala Avenue, Makati City**

Attention: **Ms. Janet A. Encarnacion**
Head, Disclosure Department

Gentlemen:

In compliance with the Memo for Brokers No. 225 dated August 28, 2003 of the Exchange, we are pleased to submit the Top 100 stockholders as of March 31, 2012 prepared by the company's stock transfer agent, AB Stock Transfers Corporation.

We trust that you find the foregoing in order.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Rodolfo Ma. A. Ponferrada', is written over the typed name.

Rodolfo Ma. A. Ponferrada
Corporate Information Officer

PHILIPPINE BANK OF COMMUNICATIONS
TOP ONE HUNDRED (100) STOCKHOLDERS
AS OF MARCH 31, 2012

	Total Shares	%	Common Shares	Preferred Shares
1. ISM Communications Corporation	63,233,759	36.64%	17,460,219	45,773,540
2. Ongpin, Roberto V.	42,980,484	24.90%	12,263,593	30,716,891
3. Recto, Eric Ramon O.	29,498,943	17.09%	8,416,917	21,082,026
4. Langford Universal Finance Ltd. (Foreign)	15,263,964	8.84%	4,355,254	10,908,710
5. Injap Investments, Inc.	3,581,706	2.08%	1,021,965	2,559,741
6. Roxas-Chua, Ray Anthony Go	3,581,706	2.08%	1,021,964	2,559,742
7. PCD Nominee Corporation:	3,040,727	1.76%	3,040,727	
Filipino - 2,996,957				
Non-Filipino - 43,770				
8. Yu, Gregorio T.	1,790,863	1.04%	510,993	1,279,870
9. Cham, Edison Siy	1,790,853	1.04%	510,983	1,279,870
10. Chan Kok Bin	1,790,853	1.04%	510,983	1,279,870
11. KLG International, Inc.	1,790,853	1.04%	510,983	1,279,870
12. Lim, Benito T.	1,790,853	1.04%	510,983	1,279,870
13. Chua, Renato C.	814,666	0.47%	814,666	
14. Ching, Winnifred	187,798	0.11%	187,798	
15. Ching, Jeffrey	175,505	0.10%	175,505	
16. Southeastern Investment & Realty Corporation	133,130	0.08%	133,130	
17. Sy, Dioceldo S.	117,820	0.07%	117,820	
18. Center Industrial & Investment, Inc.	114,970	0.07%	114,970	
19. Bengsons Investment & Realty Corporation	88,133	0.05%	88,133	
20. Cosmopolitan Investment Co., Inc.	85,422	0.05%	85,422	
21. Ong Siu Khim	75,822	0.04%	75,822	
22. Modern Art Supply Corporation	39,605	0.02%	39,605	
23. Sy Hian Cho	33,103	0.02%	33,103	
24. Ang, Timothy	30,881	0.02%	30,881	
25. Dy Sun, Albert	30,753	0.02%	30,753	
26. Ang, Judy	29,950	0.02%	29,950	
27. Ang Yok Kim, George	25,733	0.01%	25,733	
28. Consolidated Tobacco Industries of the Phils	25,476	0.01%	25,476	
29. Sy, Janice C.	24,762	0.01%	24,762	
30. Sy, Ramon	18,800	0.01%	18,800	
31. Cokeng, Dolores Y.	15,593	0.01%	15,593	
32. SM Investment Corporation	13,431	0.01%	13,431	
33. Dy Sun, Jose Victory	11,090	0.01%	11,090	
34. Tan, Angelin	10,000	0.01%	10,000	
35. Ang, Milton	9,649	0.01%	9,649	
36. Ti Kong Lu	9,649	0.01%	9,649	
37. Ong, Rosanna Y.	7,832	0.00%	7,832	
38. Lim, Miguel G.	7,000	0.00%	7,000	
39. Lim, Yock L.	7,000	0.00%	7,000	
40. Perez, Johnny	6,341	0.00%	6,341	
41. Do, Cayetano Lu	5,790	0.00%	5,790	
42. Esteban, Domingo	5,313	0.00%	5,313	
43. Ang Beng Kee, Leonardo	4,824	0.00%	4,824	
44. Ang, Pinky Y.	4,824	0.00%	4,824	
45. Ang, Ruby Y.	4,824	0.00%	4,824	

	Total Shares	%	Common Shares	Preferred Shares
46. Ang, Victor	4,824	0.00%	4,824	
47. Castro, Betty	4,700	0.00%	4,700	
48. Ty, Que	4,700	0.00%	4,700	
49. Ang Poe Guan, William	4,106	0.00%	4,106	
50. Dy Sun, Rachelle Y.	3,546	0.00%	3,546	
51. Go, Miguela S.	3,280	0.00%	3,280	
52. Jao, Stanley T.	3,200	0.00%	3,200	
53. Chua, Bobby G.	3,133	0.00%	3,133	
54. Computer Graphics, Inc.	3,133	0.00%	3,133	
55. Rodriguez, Judy	3,133	0.00%	3,133	
56. Sy, Judy	3,133	0.00%	3,133	
57. Sy, Regan C.	3,133	0.00%	3,133	
58. Sy, Richmond C.	3,133	0.00%	3,133	
59. Lee, Jose T.	3,132	0.00%	3,132	
60. Web-Jet Investment & Development Corporation	3,132	0.00%	3,132	
61. Tan, Luciano H.	2,800	0.00%	2,800	
62. Tan, Ching	2,566	0.00%	2,566	
63. Chua, Hu Hua	2,506	0.00%	2,506	
64. Lee, Rosita G.	2,350	0.00%	2,350	
65. Lee, Tiak Him	2,350	0.00%	2,350	
66. Ang Chun Ti, Robert	2,333	0.00%	2,333	
67. Ong, Albert G.	2,232	0.00%	2,232	
68. Yao, E-Chu	2,175	0.00%	2,175	
69. Chua, Dax V.	2,000	0.00%	2,000	
70. Chua, Shoji R.	2,000	0.00%	2,000	
71. Fraser, Alan R. (Foreign)	2,000	0.00%	2,000	
72. Lee, Mary Y.	2,000	0.00%	2,000	
73. Lee, Rodolfo N.	2,000	0.00%	2,000	
74. Cheng, Victor T.	1,957	0.00%	1,957	
75. Ang, Cynthia	1,929	0.00%	1,929	
76. Son Keng Po, Wilfred D.	1,722	0.00%	1,722	
77. Lim, Daisy Q.	1,626	0.00%	1,626	
78. Lim, Felix K.	1,626	0.00%	1,626	
79. Chua, Raphael L.	1,566	0.00%	1,566	
80. Dy Ching Bing, Antonio	1,566	0.00%	1,566	
81. Dy, Kenneth Christopher	1,566	0.00%	1,566	
82. Go, Augusto L.	1,566	0.00%	1,566	
83. Go, Diana C. (Chinese)	1,566	0.00%	1,566	
84. Go, Philip L.	1,566	0.00%	1,566	
85. Kam Chu Ngai (Chinese)	1,566	0.00%	1,566	
86. Kaw, Gregorio Ang	1,566	0.00%	1,566	
87. Kaw, Suzanne G.	1,566	0.00%	1,566	
88. Kokseng, Edward U.	1,566	0.00%	1,566	
89. Kokseng, Jr., Vincent U.	1,566	0.00%	1,566	
90. Kokseng, Mildred C.	1,566	0.00%	1,566	
91. Kokseng, Raymond U.	1,566	0.00%	1,566	
92. Lao, Siok Bee	1,566	0.00%	1,566	
93. Lim, Jenny C.	1,566	0.00%	1,566	
94. Lim, Willy T.	1,566	0.00%	1,566	
95. Marquez, Carmela Helen Ng	1,566	0.00%	1,566	
96. Ocampo, Moises K.	1,566	0.00%	1,566	
97. Ong, Antonio L.	1,566	0.00%	1,566	

	Total Shares	%	Common Shares	Preferred Shares
98. Pua, William U.	1,566	0.00%	1,566	
99. Sinco, Cesar C.	1,566	0.00%	1,566	
100. Tan, Angeline G.	1,566	0.00%	1,566	
Tan, Bernadine G.	1,566	0.00%	1,566	
Tan, Kenway H.	1,566	0.00%	1,566	
Ting, Edward	1,566	0.00%	1,566	
Tio, Willie	1,566	0.00%	1,566	
Tiong Han Tan	1,566	0.00%	1,566	
Tiu, Aurora Chiu	1,566	0.00%	1,566	
Tuquib, Grace Chua	1,566	0.00%	1,566	
Tuquib, Roel	1,566	0.00%	1,566	
Uy, Salvador Tan	1,566	0.00%	1,566	

Total issued and outstanding shares (inclusive of
one (1) common share in treasury) - 172,598,966



TOP 100 PDTC PARTICIPANTS

Business Date 03/30/2012

Security ID: PBC000000000		Security Name: PHIL. BANK OF COMMUNICATIONS		
Transfer Agent: TATO1000000		Transfer Agent Name: AB STOCK TRANSFERS CORPORATION		
S. No.	BPID	BPNAME	HOLDING	%HOLDING
1	23600000000	R. NUBLA SECURITIES, INC.	1,681,014.00	55.2832924
2	15400000000	EVERGREEN STOCK BROKERAGE & SEC., INC.	437,593.00	14.3910650
3	28600000000	SOLAR SECURITIES, INC.	137,226.00	4.5129339
4	19900000000	LUYS SECURITIES COMPANY, INC.	119,946.00	3.9446488
5	15000000000	EASTERN SECURITIES DEVELOPMENT CORPORATION	86,298.00	2.8380713
6	17400000000	HDI SECURITIES, INC.	85,057.00	2.7972587
7	11800000000	ASIASEC EQUITIES, INC.	79,460.00	2.6131909
8	23200000000	ALAKOR SECURITIES CORPORATION	33,990.00	1.1178248
9	10200000000	ABACUS SECURITIES CORPORATION	31,739.00	1.0437964
10	28800000000	G.D. TAN & COMPANY, INC.	29,782.00	0.9794368
11	14700000000	E. CHUA CHIACO SECURITIES, INC.	23,697.00	0.7793202
12	27200000000	BERNAD SECURITIES, INC.	20,646.00	0.6789824
13	26900000000	WEALTH SECURITIES, INC.	18,209.00	0.5988371
14	23500000000	REGINA CAPITAL DEVELOPMENT CORPORATION	17,926.00	0.5895301
15	23000000000	QUALITY INVESTMENTS & SECURITIES CORPORATION	17,195.00	0.5654898
16	34500000000	UNICAPITAL SECURITIES INC.	16,870.00	0.5548015
17	CITI1000000	CITIBANK N.A.	14,726.00	0.4842921
18	25100000000	TANSENGCO & CO., INC.	12,314.00	0.4049689
19	21700000000	RCBC SECURITIES, INC.	11,000.00	0.3617556
20	21000000000	MOUNT PEAK SECURITIES, INC.	10,962.00	0.3605059
21	11200000000	AB CAPITAL SECURITIES, INC.	9,719.00	0.3196275
22	20300000000	CITISECONLINE.COM, INC.	8,213.00	0.2700999
23	16200000000	F. YAP SECURITIES, INC.	8,146.00	0.2678965
24	22500000000	PREMIUM SECURITIES, INC.	8,026.00	0.2639500
25	38700000000	COHERCO SECURITIES, INC.	7,810.00	0.2568465
26	20500000000	MERCANTILE SECURITIES CORP.	7,680.00	0.2525712
27	11100000000	ANSALDO, GODINEZ & CO., INC.	7,605.00	0.2501047
28	13300000000	CITISECURITIES, INC.	7,125.00	0.2343190

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S. No.	BPID	BPNAME	HOLDING	%HOLDING	
29	17500000000	H. E. BENNETT SECURITIES, INC.	6,593.00	0.2168231	
30	11500000000	SB EQUITIES, INC.	6,351.00	0.2088645	
31	28200000000	PCCI SECURITIES BROKERS CORP.	6,260.00	0.2058718	
32	14000000000	IGC SECURITIES INC.	5,700.00	0.1874552	
33	21500000000	OPTIMUM SECURITIES CORPORATION	5,123.00	0.1684794	
34	32800000000	DW CAPITAL INC.	5,100.00	0.1677230	
35	19800000000	LUCKY SECURITIES, INC.	4,815.00	0.1583503	
36	25300000000	TOWER SECURITIES, INC.	4,530.00	0.1489775	
37	12600000000	BPI SECURITIES CORPORATION	4,350.00	0.1430579	
38	22000000000	ATR-KIM ENG SECURITIES, INC.	3,866.00	0.1271406	
39	28300000000	EAGLE EQUITIES, INC.	3,762.00	0.1237204	
40	10900000000	BA SECURITIES, INC.	3,740.00	0.1229969	
41	25700000000	TRI-STATE SECURITIES, INC.	3,694.00	0.1214841	
42	18100000000	INVESTORS SECURITIES, INC.	2,886.00	0.0949115	
43	23800000000	R. S. LIM & CO., INC.	2,500.00	0.0822172	
44	20000000000	MANDARIN SECURITIES CORPORATION	2,496.00	0.0820856	
45	24700000000	STANDARD SECURITIES CORPORATION	2,238.00	0.0736008	
46	26700000000	FIRST METRO SECURITIES BROKERAGE CORP.	1,870.00	0.0614985	
47	23100000000	R & L INVESTMENTS, INC.	1,443.00	0.0474558	
48	27500000000	YAO & ZIALCITA, INC.	1,269.00	0.0417334	
49	27800000000	YU & COMPANY, INC.	1,180.00	0.0388065	
50	14900000000	EAST WEST CAPITAL CORPORATION	1,100.00	0.0361756	
51	21900000000	PAPA SECURITIES CORPORATION	940.00	0.0309137	
52	24600000000	SUMMIT SECURITIES, INC.	940.00	0.0309137	
53	16100000000	FRANCISCO ORTIGAS SECURITIES, INC.	864.00	0.0284143	
54	13600000000	TRITON SECURITIES CORP.	856.00	0.0281512	
55	23900000000	RTG & COMPANY, INC.	636.00	0.0209161	
56	18200000000	IMPERIAL, DE GUZMAN, ABALOS & CO., INC.	634.00	0.0208503	
57	14300000000	DAVID GO SECURITIES CORP.	630.00	0.0207187	
58	23300000000	R. COYIUTO SECURITIES, INC.	626.00	0.0205872	
59	24300000000	FIDELITY SECURITIES, INC.	500.00	0.0164434	
60	25200000000	THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	500.00	0.0164434	
61	28500000000	GOLDEN TOWER SECURITIES & HOLDINGS, INC.	500.00	0.0164434	
62	10100000000	A & A SECURITIES, INC.	420.00	0.0138125	
63	18000000000	I. B. GIMENEZ SECURITIES, INC.	270.00	0.0088795	
64	11000000000	ANGPING & ASSOCIATES SECURITIES, INC.	257.00	0.0084519	
65	10300000000	ACCORD CAPITAL EQUITIES CORPORATION	240.00	0.0078928	
66	18800000000	J.M. BARCELON & CO., INC.	235.00	0.0077284	
67	13100000000	PCIB SECURITIES, INC.	173.00	0.0056894	
68	25600000000	TRENDLINE SECURITIES CORPORATION	78.00	0.0025652	

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S. No.	BPID	BPNAME	HOLDING	%HOLDING
69	12300000000	BENJAMIN CO CA & CO., INC.	69.00	0.0022692
70	21300000000	NIEVES SECURITIES, INC.	67.00	0.0022034
71	11600000000	ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	66.00	0.0021705
72	20800000000	MDR SECURITIES, INC.	56.00	0.0018417
73	12200000000	BELSON SECURITIES, INC.	55.00	0.0018088
74	17200000000	GUILD SECURITIES, INC.	52.00	0.0017101
75	27000000000	WESTLINK GLOBAL EQUITIES, INC.	50.00	0.0016443
76	12800000000	CAMPOS, LANUZA & COMPANY, INC.	47.00	0.0015457
77	14100000000	CUALOPING SECURITIES CORPORATION	35.00	0.0011510
78	24000000000	S.J. ROXAS & CO., INC.	30.00	0.0009866
79	16800000000	GLOBALINKS SECURITIES & STOCKS, INC.	28.00	0.0009208
80	19400000000	LIPPO SECURITIES, INC.	24.00	0.0007893
81	PHBC0000000	PHIL. BANK OF COMMUNICATIONS	4.00	0.0001315
82	22400000000	PNB SECURITIES, INC.	3.00	0.0000987
83	13000000000	CENTURY SECURITIES CORPORATION	2.00	0.0000658