

Cable & Wireless Communications, Inc. (“CWCI”), holder of international Section 214 authorization ITC-214-20100512-00191,¹ hereby notifies the Commission of affiliations to foreign carriers resulting from the transaction (the “Transaction”) in which its parent Cable & Wireless Communications Plc (“C&W”) is acquiring Columbus Networks, Limited (“CNL”).² Parts of the Transaction, not including transfer of CNL subsidiaries holding Commission licenses, closed on March 31, 2015. As of that closing, C&W, the 100% indirect owner of CWCI, came to control a number of CNL foreign carrier affiliates, disclosed herein.

Question 5 – Foreign Carrier Affiliations

CWCI’s parent C&W certified in the Transfer of Control Applications cited above that C&W is and will continue to be affiliated with the following foreign carriers:

Foreign Carrier	Country
Cable and Wireless (Anguilla) Limited	Anguilla
Cable & Wireless Antigua & Barbuda Limited	Antigua and Barbuda
The Bahamas Telecommunications Company Limited	The Bahamas
Cable & Wireless (Barbados) Limited	Barbados
Cable and Wireless (BVI) Limited	British Virgin Islands
Cable and Wireless (Cayman Islands) Limited	Cayman Islands
Cable & Wireless Dominica Limited	Dominica
CWC Cable & Wireless Communications Dominican Republic SA	Dominican Republic
Cable & Wireless Grenada Limited	Grenada
Cable & Wireless Jamaica Limited	Jamaica
Cable and Wireless (West Indies) Limited	Montserrat
Cable & Wireless Panama S.A.	Panama
Cable & Wireless (St. Lucia) Limited	St. Lucia
Cable & Wireless St. Kitts & Nevis Limited	St. Kitts and Nevis
Cable & Wireless St. Vincent and the Grenadines Limited	St. Vincent and the Grenadines
Cable & Wireless (Seychelles) Limited	Seychelles
Telecommunications Services of Trinidad and Tobago Limited	Trinidad and Tobago
Cable and Wireless (TCI) Limited	Turks and Caicos Islands

¹ See *Public Notice*, DA No. 19-1496, August 12, 2010; Letter to International Bureau Chief from Rose Landa, Esq., dated October 23, 2014, notifying the Commission of the change of name of the original licensee of File No. ITC-214-20100512-00191, Cable & Wireless Holdings, Inc., to Cable & Wireless Communications, Inc.

² See Joint Application for Transfer of Control of Cable Landing Licenses from Columbus Networks, Limited to Cable & Wireless Communications Plc, File Nos. SCL-T/C-20141121-00013 and SCL-T/C-20141121-00014; Applications for Transfer of Control of Section 214 Authorizations from Columbus Networks, Limited to Cable & Wireless Communications Plc, File Nos. ITC-T/C-20141121-00304 and ITC-T/C-20141121-00307 (“Transfer of Control Applications”).

As C&W further certified, it will comply with the dominant carrier safeguards of Sections 63.10(c) and (e) of the Commission's Rules in the provision of international services to the destination markets where its affiliated carrier has dominant status:³

Destination Market	Foreign Carriers with Market Power
Anguilla	Cable and Wireless (Anguilla) Limited
Antigua and Barbuda	Cable & Wireless (Antigua and Barbuda) Ltd.*
Bahamas	The Bahamas Telecommunications Company Limited*
Barbados	Cable & Wireless (Barbados) Ltd.*
British Virgin Islands	Cable and Wireless (BVI) Limited*
Cayman Islands	Cable & Wireless (Cayman Islands) Ltd.
Dominica	Cable & Wireless Dominica Limited*
Grenada	Cable & Wireless Grenada Ltd.*
Jamaica	Cable & Wireless Jamaica Ltd.
Montserrat	Cable & Wireless (West Indies) Ltd.
Panama	Cable & Wireless Panama S.A.
St. Kitts and Nevis	Cable & Wireless (St. Kitts and Nevis) Ltd.*
St. Lucia	Cable & Wireless (St. Lucia) Limited
St. Vincent/Grenadines	Cable & Wireless (St. Vincent and the Grenadines) Ltd.
Seychelles	Cable & Wireless (Seychelles) Ltd.
Trinidad and Tobago	Telecommunications Services of Trinidad and Tobago Limited
Turks and Caicos	Cable and Wireless (TCI) Ltd.*

* An asterisk indicates that the name of the foreign carrier providing service has changed since the Foreign Carrier List was last compiled, or that a successor to that carrier is now providing service.

CWCI hereby notifies the Commission that, through its parent C&W, as of March 31, 2015, it is now affiliated with the following additional CNL-affiliated foreign carriers:

Foreign Carrier	Country
Kelcom International (Antigua & Barbuda) Ltd.	Antigua & Barbuda
Columbus Communications Limited	The Bahamas

³ This list includes all the carriers affiliated with C&W that appear on the FCC's "List of Foreign Carriers that are Presumed to Possess Market Power in Foreign Telecommunications Markets", DA 07-233, January 26, 2007 ("Foreign Carrier List"). C&W believes that a number of its affiliated carriers that appear on the Foreign Carrier List are no longer dominant in the designated market as a result of the introduction of new fixed and mobile competition. However, C&W does not believe that this notification is the appropriate vehicle for revisiting the dominant status of any individual destination market. To the extent that the Commission would like to review dominant status of particular carriers, C&W urges the Commission to undertake such review in a separate proceeding.

Foreign Carrier	Country
Columbus Telecommunications (Barbados) Limited	Barbados
Karib Cable Inc.	Barbados
ARCOS-1 USA, Inc.	Belize
Columbus Networks Bonaire, N.V.	Bonaire
Columbus Networks de Colombia, Ltda.	Colombia
Columbus Networks Zona Franca Ltda.	Colombia
Lazus de Colombia S.A.S.	Colombia
Columbus Networks de Costa Rica S.R.L.	Costa Rica
Promitel Costa Rica S.A.	Costa Rica
Columbus Communications Curacao N.V.	Curacao
Columbus Networks Curacao, N.V.	Curacao
Columbus Networks Netherlands Antilles, N.V.	Curacao
Columbus Networks Dominicana, S.A.	Dominican Republic
Columbus Networks Centroamerica, S. de R.L.	El Salvador
Columbus Networks El Salvador S.A.	El Salvador
Columbus Communications (Grenada) Limited	Grenada
Columbus Networks de Guatemala Limitada	Guatemala
Columbus Networks de Honduras, S. de R.L.	Honduras
Columbus Communications Jamaica Limited	Jamaica
Columbus Networks Jamaica Limited	Jamaica
Columbus Networks de México S. de R.L. de C.V.	Mexico
Columbus Networks Nicaragua y Compañía Limitada	Nicaragua
Columbus Networks de Panamá S.R.L.	Panama
Promitel Panama S.A.	Panama
Lazus Peru S.A.C.	Peru
Columbus Communications (St. Lucia) Limited	St. Lucia
Tele (St. Lucia) Inc.	St. Lucia
Columbus Communications St. Vincent and the Grenadines Limited	St. Vincent & The Grenadines
Columbus Networks International (Trinidad) Limited	Trinidad & Tobago
Columbus Communications Trinidad Limited	Trinidad & Tobago
Columbus Networks, Limited	Turks & Caicos
Columbus Networks de Venezuela, S.A.	Venezuela

Question 12 – Section 63.11(b) Factors

Pursuant to Section 63.11(b), this notification is being filed post-consummation, within 30 days after consummation of the relevant part of the Transaction, because the new foreign carrier affiliates are either in WTO countries and are non-dominant, or, in one case, the foreign carrier affiliate is in a non-WTO country (The Bahamas) where an existing C&W affiliate (and not the acquired CNL affiliate) has been adjudicated as dominant, as noted above.

Question 16 – Qualification for Non-Dominant Status

CWCI does not request non-dominant carrier status for the routes where it has already accepted the dominant carrier safeguards (indicated above), but does request continued regulation as a non-dominant carrier for the remaining routes where it has acquired a foreign carrier affiliate, as follows:

Destination Market	Foreign Carriers <i>without</i> Market Power
Belize	ARCOS-1 USA, Inc.
Bonaire	Columbus Networks Bonaire, N.V.
Colombia	Columbus Networks de Colombia, Ltda. Columbus Networks Zona Franca Ltda. Lazus de Colombia S.A.S.
Costa Rica	Columbus Networks de Costa Rica S.R.L. Promitel Costa Rica S.A.
Curacao	Columbus Communications Curacao N.V. Columbus Networks Curacao, N.V. Columbus Networks Netherlands Antilles, N.V.
Dominican Republic	Columbus Networks Dominicana, S.A.
El Salvador	Columbus Networks Centroamerica, S. de R.L. Columbus Networks El Salvador S.A.
Guatemala	Columbus Networks de Guatemala Limitada
Honduras	Columbus Networks de Honduras, S. de R.L.
Mexico	Columbus Networks de México S. de R.L. de C.V.
Nicaragua	Columbus Networks Nicaragua y Compañía Limitada
Peru	Lazus Peru S.A.C.
Venezuela	Columbus Networks de Venezuela, S.A.

Pursuant to Section 63.10(a)(3), CWCI qualifies for non-dominant carrier status on these international routes, because each of the named foreign carrier affiliates lacks 50% market share in the fixed local access and international transport markets on the foreign end of the route. None are included in the FCC's list of carriers presumed to have market power, cited above.

Question 17 – Name of Newly Affiliated Foreign Carriers and the Country(ies) in Which They are Authorized to Provide Service

See answer to Question 5 above.

Question 18 – Authorized Services to These Countries

CWCI currently holds Section 214 authority under File No. ITC-214-20100512-00191. Pursuant to this authorization, CWCI is authorized to provide facilities-based service and resale services to all international points except Monaco.

Question 19 – Countries Served Solely Through Resale of International Switched Services of Unaffiliated U.S. Facilities-Based Carriers

None.

Question 20 – Name, Address, Citizenship, and Principal Business of Persons or Entities Owning at Least 10% of CWCI

The following entity holds a direct 100% voting and equity interest in CWCI:

Cable & Wireless (West Indies) Limited
2nd Floor
62-65 Chandos Place
London, United Kingdom
WC2N 4HG
Jurisdiction: United Kingdom
Principle Business: International telecommunications services
Interest: Direct holding of 100%

The following entity holds a direct 100% voting and equity interest in Cable & Wireless (West Indies) Limited and thus an indirect 100% voting and equity interest in CWCI:

CWI Group Limited
2nd Floor
62-65 Chandos Place
London, United Kingdom
WC2N 4HG
Jurisdiction: United Kingdom
Principle Business: International telecommunications services

Interest: Indirect holding of 100%

The following entity holds a direct 100% voting and equity interest in CWI Group Limited and thus an indirect 100% voting and equity interest in CWCI:

Sable Holding Limited
2nd Floor
62-65 Chandos Place
London, United Kingdom
WC2N 4HG
Jurisdiction: United Kingdom
Principle Business: International telecommunications services
Interest: Indirect holding of 100%

The following entity holds a direct 100% voting and equity interest in Sable Holding Limited and thus an indirect 100% voting and equity interest in CWCI:

Cable & Wireless Limited
2nd Floor
62-65 Chandos Place
London, United Kingdom
WC2N 4HG
Jurisdiction: United Kingdom
Principle Business: International telecommunications services
Interest: Indirect holding of 100%

The following entity holds a direct 100% voting and equity interest in Cable & Wireless Limited and thus an indirect 100% voting and equity interest in CWCI:

Cable & Wireless Communications Plc
2nd Floor
62-65 Chandos Place
London, United Kingdom
WC2N 4HG
Jurisdiction: United Kingdom
Principle Business: International telecommunications services
Interest: Indirect holding of 100%

The following shareholders of C&W own 10% or more of C&W and thus own 10% or more of CWCI:

CVBI Holdings (Barbados), Inc. and Clearwater Holdings (Barbados) Limited
(Ultimately controlled by Mr. John Risley, a Canadian citizen)
Suite 205-207
Dowell House
Cr. Roebuck & Palmetto Streets

Bridgetown, Barbados
Jurisdiction: Barbados
Principal Business: Investment
Interest: Direct holding of 18.18%

Columbus Holding LLC
(Ultimately controlled by Mr. John Malone, a U.S. citizen)
12300 Liberty Boulevard
Englewood, CO 80112
United States
Jurisdiction: Colorado
Principal Business: Investment
Interest: Direct holding of 13.26%

Question 21 – Interlocking Directorates with Named Foreign Carriers

CWCI has the following existing interlocking directorates with foreign carriers:

Belinda Bradbury: Director of CWCI, and Director of Cable & Wireless St. Vincent and the Grenadines Limited, Cable and Wireless (Anguilla) Limited, and Cable and Wireless (West Indies) Limited