

March 28, 2019

BY ELECTRONIC FILING

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

Re: Partial Pro Forma Assignment of International Section 214 Authorization for the Honotua Submarine Cable System, FCC File Nos. ITC-214-20081008-00453 and ITC-MOD-20180410-00068

Dear Ms. Dortch:

Pursuant to 47 U.S.C. § 214 and 47 C.F.R. § 63.24, ONATI SAS (“ONATI”) (FRN 0028355444), hereby notifies the Commission of the partial *pro forma* assignment of the international Section 214 authorization for the Honotua submarine cable system connecting French Polynesia and Hawaii, from Office des postes et télécommunications de Polynésie française (“OPT”) (FRN 0015464282) to ONATI. This partial *pro forma* assignment results from a corporate reorganization of OPT. OPT and ONATI will therefore be authorization holders for the Honotua submarine cable system (and for the associated cable landing license, the subject of a partial *pro forma* assignment notification filed in parallel with this notification).

1. Background

As authorized by recent changes in French Polynesia law, OPT has undertaken a restructuring of its operations to create new French Polynesia operating subsidiaries for its telecommunications, postal, and financial services businesses that will leave OPT itself operating as a holding company. By deed dated December 31, 2018, OPT agreed to delegate to ONATI the provision of telecommunications services in French Polynesia through the operation and use of network infrastructure owned by OPT (including the physical assets of the Honotua submarine cable system, to which OPT will retain legal title). Under the delegation, OPT will also transfer to ONATI the personnel of OPT’s telecommunications business. The delegation has been implemented on a phased basis, with delegation of authority with respect to the Honotua submarine cable system effective as of March 1, 2019.

2. Information Required by 47 C.F.R. §§ 63.18(a)-(d) and (h) and 63.24(f)(2)

As required by 47 C.F.R. §§ 63.18(a)-(d) and (h) and 63.24(f)(2)(i), ONATI provides the following information:

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a. Name, Address, and Telephone Number

ONATI SAS
Rond-point de la base marine, Fare Ute
BP 440
98713 Papeete, Tahiti
French Polynesia
+689 41 74 65

b. Place of Organization:

ONATI is organized under French Polynesia law.

c. Contact Information

ONATI's contact information is as follows:

Tehina Thuret
Executive Manager
Telecoms & Multimedia Business Unit
ONATI SAS
Rond-point de la base marine, Fare Ute
BP 440
98713 Papeete, Tahiti
French Polynesia
+689 41 74 65

Correspondence concerning this filing should be sent to Mr. Thuret at the address listed above, with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036
+1 202 730 1337
kbressie@hwglaw.com

d. Prior International Section 214 Authority

ONATI has not previously held international Section 214 authority from the Commission.

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e. Direct and Indirect Ownership; Interlocking Directorates with Foreign Carriers

ONATI has two 10-percent-or-greater direct and indirect interest holders, as follows:

Office des postes et télécommunications de Polynésie française

Address: Fare Ute, P.O. Box 605, 98713 Papeete, Tahiti

Place of Organization: French Polynesia

Principal Business: holding company

Interest Held: OPT holds 100 percent of ONATI's economic and voting interests.

Presidency of the Government of French Polynesia

Address: Quartier Broche, Avenue Pouvanaa a Oopa, BP 2551, Papeete, Tahiti,
French Polynesia

Place of Organization: French Polynesia

Principal Business: government

Interest Held: The Government of French Polynesia holds 100 percent of OPT's economic and voting interests.

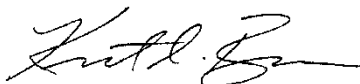
f. Certification Regarding Prior *Pro Forma* Transactions

As required by 47 C.F.R. § 63.24(f)(2)(ii), ONATI certifies in the attached certification that this partial assignment is *pro forma* in nature and would not, when considered together with all previous *pro forma* transactions, result in a change in control of the Honotua submarine cable system.

* * * * *

ONATI has notified the Team Telecom agencies of this partial *pro forma* assignment.

Yours sincerely,



Kent Bressie
Susannah Larson

Counsel to ONATI SAS

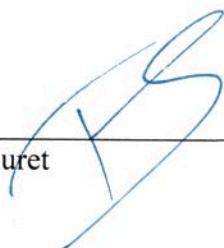
Attachment

CERTIFICATION

I, Tehina Thuret, as Telecoms & Multimedia Business Unit Executive Manager of ONATI SAS, hereby certify as follows:

1. I have reviewed the attached partial *pro forma* assignment notification and believe that it states fully and accurately the circumstances of the partial *pro forma* assignment of the international Section 214 authorization for the Honotua submarine cable system.
2. This partial assignment described therein is *pro forma* in nature under the Commission's rules and, together with all previous *pro forma* transactions, would not result in a change in the ultimate control of the international Section 214 authorization for the Honotua submarine cable system.
3. No party to this notification is subject to a denial of federal benefits, including FCC benefits, under Section 5301 of the Anti-Drug Abuse Act of 1988.

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



Tehina Thuret

Executed March 27th, 2019