

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Columbia Ventures Corporation,)	
KCK Limited, and)	File Nos. SCL-T/C-20140820-00007
Murosa Development S.A.R.L.)	ITC-T/C-20140820-00242
)	ITC-T/C-20140820-00244
Applications for Consent to Transfer Control)	WC Docket 14-138
of Companies Holding International Section)	
214 Authority, Blanket Domestic Section)	
214 Authority, and a Submarine Cable)	
Landing License Pursuant to Section 214 of)	
the Communications Act of 1934, as)	
Amended)	
)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Homeland Security (“DHS”), on behalf of the Department of Justice (“DOJ”) and Department of Defense (“DOD”), submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, DHS advises the Commission that it has no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the assurance of Hibernia NGS Limited (“Hibernia”) and KCK Limited to abide by the commitments and undertakings set forth in the December 15, 2014 Letter of Assurance (“2014 LOA”), which is attached hereto as Attachment A, as well as the commitments and undertakings set forth in the September 30, 2010 Letter of Assurance from Hibernia Group ehf² to DHS, DOJ

¹ 47 C.F.R. § 1.41.

² As set forth in the 2014 LOA, at footnote 1, Hibernia Group ehf merged with and into Hibernia NGS

and DOD (“2010 LOA”), as revised by the 2014 LOA, which was originally attached as a condition to Hibernia Media LLC’s 2010 International 214 license.³ The original 2010 LOA is also attached hereto as Attachment B.

In the above-referenced proceedings, Columbia Ventures Corporation, KCK Limited and Murosa Development S.A.R.L. have sought FCC authorization for the proposed transfer of control of Hibernia Atlantic U.S. LLC (“Hibernia Atlantic”) and Hibernia Media LLC, as well as the proposed transfer of the submarine cable landing license held by Hibernia Atlantic.⁴

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of Hibernia and KCK in connection with the above-referenced proceedings, the Department has concluded that the additional commitments set forth in the LOA will help ensure that the Department can proceed appropriately to satisfy its responsibility for enforcing the law, protecting the national security, and preserving public safety. Accordingly, the Department advises the Commission that it has no objection to the Commission granting the applications in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by Hibernia and KCK with the 2014 LOA and the 2010 LOA, as amended.

Limited in January 2014 and Hibernia assumed Hibernia Group ehf’s commitments under the 2010 LOA. In 2010, Hibernia Group ehf was the direct parent company of Hibernia Atlantic U.S. LLC and Hibernia Media LLC, among other entities.

³ ITC-214-20100303-00093

⁴ SCL-LIC-19990804-00012, SCL-MOD-20020412-00022

Respectfully submitted,

/S/ Shawn Cooley

Shawn Cooley

U.S. Department of Homeland Security

Director – Foreign Investment Risk Management

Office of Policy

3801 Nebraska Avenue

Washington, D.C. 20016

December 19, 2014