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July 31, 2015

VIA ELECTRONIC FILING

Denise Coca
Chief, Policy Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Applications of Columbus Networks, Limited and Cable & Wireless
Communications Plc for Consent to Transfer Control of Licensees, File Nos. ITC-
T/C-20141121- 00304, ITC-T/C-20141121-00307, SCL-T/C-20141121-00013, SCL-
T/C- 20141121-00014**

Dear Ms. Coca:

In response to the Commission staff's telephonic request for additional information, Columbus New Cayman Limited,¹ Columbus Networks USA, Inc. and ARCOS-1 USA, Inc. (collectively, "Columbus USA"), and Cable & Wireless Plc ("C&W"), hereby submit the following information in relation to the above-referenced applications:

1. Please categorize the Net IRUs (in STM-1s) for the ARCOS-1, CFX-1 and Fibralink cables as:
 - a. Total IRUs (in STM-1s) granted to each U.S. and Foreign Submarine Cable Licensees and/or Common Carriers:
 - i. U.S. Submarine Cable Licensees and/or Common Carriers:

¹ Columbus New Cayman Limited replaced Columbus Networks, Limited as the Transferor in the above-referenced applications following a *pro forma* transfer of control completed on March 31, 2015. See *Notification of Pro Forma Transfer and Minor Amendment to Applications*, SCL-T/C-20150421-00010, et al. (filed April 21, 2015) (the "Pro Forma Transfer").

Response: Please see Attachment A for a description of the total IRUs granted to U.S. and foreign carriers by Columbus USA as of December 31, 2014. Please also see Attachment B, which provides a list of customers and their designation as domestic or foreign. As a result of recent personnel changes, Columbus USA has undertaken a thorough review of its IRU arrangements in response to these questions. It notes that the information provided herein has been correlated between multiple internal Columbus USA databases (e.g., sales, provisioning, network administration, etc.), and is therefore, in Columbus USA's view, a more fulsome summary of the various IRU capacity arrangements undertaken by the company as of December 31, 2014. Columbus USA intends to revise and amend its 2014 annual circuit status report to reflect this information.²

ii. Foreign Carriers:

Response: Please see Attachment A for an analysis of total IRUs which have been granted to U.S. and foreign carriers by Columbus USA. Please also see Attachment B, which provides a list of customers and their designation as domestic or foreign.

b. Total IRUs (in STM-1s) granted to Digicel:

Response: Please see Attachment C for the total IRUs granted to Digicel. Please also see response to Question 2 below.³

c. Total IRUs (in STM-1s) to Enterprise Customers:

Response: Columbus USA has not sold any IRUs to enterprise customers.

d. Other (any residual IRUs not fitting into the above categories):

Response: Columbus USA is not aware of any other categories of any IRUs not otherwise fitting into the above categories.

² Note that the capacity and IRUs listed in response to these questions do not reflect arrangements made by Columbus USA of less than STM-1 capacity. Columbus USA does not believe that those arrangements of less than STM-1 capacity are material with respect to this data response. Columbus USA also notes that its arrangements include primary paths and working paths, and it has not included protected path arrangements so as not to double-count IRU capacity sold. Where an IRU is for protected capacity, only the number of STM-1's used on the primary route has been counted.

³ Note that the information provided in Attachment C includes capacity sold to Digicel through Alpha Communications Network S.A., as well as Digicel's other subsidiaries.

2. Please reconcile the June 2, 2015 Attachment C responses totaling 21 STM-1s with the response provided in Section D of the March 30 Ex Parte Letter (page 8), in which the parties stated that Digicel owns 72 STM-1s of Fibralink capacity to Haiti, with the option to procure another 72 STM-1s of additional capacity. Please clarify the numbers.

Response: *In the Haiti Subsea Link Master Agreement dated September 30, 2011 between Digicel Group Ltd. and Alpha Communications Network S.A. and Columbus Networks Ltd. and Columbus Networks Haiti S.A. (the “HSLMA”) Digicel received IRUs for 72 STM-1s of capacity in consideration for paying for the construction of the Fibralink spur into Kaliko Beach, Haiti. Digicel can port the Kaliko Beach STM-1s and use them on a route on ARCOS-1 from Puerto Plata, Dominican Republic to Miami, Florida. In addition, in the HSLMA Digicel also has a right to purchase IRUs for another 72 STM-1s of capacity from Puerto Plata, DR to Miami, FL at a discounted price. As of today, Digicel has drawn down 50 STM-1s of the first 72 STM-1s described above, and ported 6 STM-1s for use from Puerto Plata to Miami (having activated 56 of the 72 STM-1s in total). These are included in the STM-1s identified in Attachment C for Columbus. For the reasons noted above in response to Question 1.a.i., the information provided in this response is, in Columbus USA’s view, a more fulsome summary of the various IRU capacity arrangements between Columbus USA and Digicel as a result of a more thorough review of the arrangements between the companies. Also, Attachment C in the June 2015 submission was incorrect because it was derived from a sales data base that did not include all of the Digicel entities that have purchased capacity from Columbus USA. The revised Attachment C in this filing comes from the same data sources as the revised Attachment A, and in Columbus USA’s view, is a more accurate accounting of these arrangements.⁴*

3. Please discuss whether the Fibralink cable forms a part of a “used and efficient” route for U.S.-Haiti traffic. Similarly, does the BDSNi cable form a part of a “used and efficient” route for U.S.-Haiti traffic?

Response: *These cables can be, and in fact are, used for effective connection between the U.S. and Haiti. For example, carriers can buy a circuit on Fibralink between Haiti and the Dominican Republic and then interconnect to other cables in the Dominican Republic that directly connect with the U.S. (e.g., ARCOS or AMX-1). Another alternative would be to go to Jamaica and connect with CFX-1 or other cables coming to the U.S. The same is true for BDSNi where the traffic can go to the Bahamas and from there back to the U.S. on the multiple cables connecting the U.S. to the Bahamas, including ARCOS.*

4. With respect to the C&W response to Question 6 of the June 2, 2015 Response, please clarify whether C&W sells collocation space and backhaul at cost-based or market rates.

⁴ Note that the total figures set forth in Attachment C include non-Haiti routes. Further, Columbus USA has treated each Digicel circuit as a linear circuit, and where the circuits span two systems (e.g. Fibralink and ARCOS-1), the STM-1 equivalents have been counted on each system.

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Response: *C&W sells collocation space at market rates where feasible and in some jurisdictions, like the British Virgin Islands, it sells collocation at cost-based rates. C&W sells backhaul at market rates.*

5. Please confirm whether Columbus USA and C&W consent to allowing the FCC to consult with the U.S. Department of Justice (“DOJ”) regarding its review of the transaction (including the sharing of confidential information submitted by Columbus USA and C&W and developed by DOJ during its review).

Response: *Columbus USA and C&W have previously consented to the exchange of information between the Commission and the DOJ.*

6. Please provide a status update on the regulatory approvals still outstanding.

Response: *The Parties now have approval in all jurisdictions other than St. Kitts and Nevis, Grenada, St. Vincent and the Grenadines, St. Lucia, Venezuela, and the Dominican Republic. These did not affect the initial closing, i.e., the transfer of the non-U.S. business of Columbus International Inc. to C&W on March 31, 2015. We continue to work with regulators in each of these jurisdictions and we expect to obtain all required clearances in due course.*

* * * * *

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Ulises R. Pin

Counsel to Columbus USA

Attachments

cc: David Krech
FCC International Bureau Policy Division
(via e-mail)

Jodi Cooper
FCC International Bureau Policy Division
(via e-mail)

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Patrick S. Campbell
Counsel to Cable & Wireless Communications Plc
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, N.W.; Suite 500
Washington, D.C. 20006
(via e-mail)

Attachment A

Columbus Networks, Limited									
Data Request									
	Cable Ownership (%)	Cable Capacity Holdings (in STM-1s) as of 12/31/2014							
	Current as of 12/31/2014	Capacity Thru Ownership (a)	Foreign Net IRU's	Domestic Net IRU's	Net IRUs (b)	Net Inter-Carrier Leaseholds (c)	Net Capacity Held (d) =(a)+(b)+(c) (d) = (e) +(f)	Activated Capacity (e)	Non-Activated Capacity (f)
U.S. Cables:									
ARCOS-1	96%	9400	-4927	-757	-5684	0	3716	3309	407
CFX-1	100%	10112	-2796	-464	-3260	0	6852	4881	1971
Non-U.S. Cables									
Fibralink	100%	448	-209	0	-209	0	239	159	80

Attachment B

N	CUSTOMER-NAME	FULL NAME	Foreign / Domestic (F/D)
1	ICE	Grupo ICE	Foreign
2	LEVEL 3 Comm, LCC	Level 3 Communications, Inc.	Domestic
3	RACSA	RACSA	Foreign
4	LAN Nautilus	Latin American Nautilus	Domestic
5	CODETEL	Compania Dominicana de Telefonos	Foreign
6	CTE	CTE Telecom	Foreign
7	BTC	Bahamas Telecommunications Company	Foreign
8	SETAR	SETAR N.V.	Foreign
9	SPRINT	Sprint Corporation	Domestic
10	TELMEX USA	Telmex USA, LLC	Domestic
11	ORBITEL	Orbitel Telecommunications	Foreign
12	CENTENNIAL	Centennial Communications Corporation	Domestic
13	TSTT	Telecommunications Services of Trinidad and Tobago	Foreign
14	Cable & Wireless	Cable and Wireless Communications	Foreign
15	UTS - Curacao	UTS Group	Foreign
16	AVANTEL	Avantel Incorporated	Foreign
17	ETB - Empresa de Teléfonos de Bogotá	Empresa de Telecomunicaciones de Bogota	Foreign
18	Cable & Wireless Panama	Cable and Wireless Panama	Foreign
19	Telefonia Bonairiano N.V.	Telefonia Bonairiano N.V. (TELBO)	Foreign
20	INTERNEXA	Internexa S.A.	Foreign
21	Telmex Colombia	Telmex Colombia S.A.	Foreign
22	COMCEL	Claro Colombia S.A.	Foreign
23	Telecomunicaciones de Guatemala SA (TELGUA)	Telecomunicaciones de Guatemala S.A.	Foreign
24	ENITEL	Empresa Nicaraguense de Telecomunicaciones S.A.	Foreign
25	Puerto Rico Telephone - PRT	Puerto Rico Telephone Company Incorporated	Domestic
26	Oceanic Digital Jamaica Limited	Oceanic Digital Jamaica Limited	Foreign
27	AT&T	AT&T Incorporated	Domestic
28	LIBERTY CABLEVISION OF PUERTO RICO, LLC	Liberty Cable Vision of Puerto Rico, LLC	Domestic
29	Caribbean Crossings Ltd	Caribbean Crossings Ltd	Foreign
30	Telecommunicatiebedrijf Suriname (Telesur)	Telecommunications Company Suriname	Foreign
31	GT&T	Guyana Telephone and Telegraph Company	Foreign
32	SERCOTEL S.A. DE CV	Sercotel, S.A. de CV	Foreign
33	BT Latam	BT LatAm	Foreign
34	America Movil	America Movil, S.A.B. de CV	Foreign
35	Critical Hub Networks, Inc	Critical Hub Networks Incorporated	Domestic
36	TIWS USA	TIWS USA Incorporated	Domestic
37	ONEMAX S.A.	Onemax, S.A.	Foreign
38	Digicel Turks and Caicos LTD	Digicel Turks and Caicos Ltd	Foreign
39	Cablenet	Cablenet Services	Domestic
40	BTL	Belize Telemedia Limited	Foreign
41	Digicel	Digicel	Foreign
42	Trilogy International Enterprises	Trilogy International Enterprises	Domestic
43	Cable and Wireless Jamaica	Cable and Wireless Jamaica Ltd	Foreign
44	Digicel - Mossel Jamaica	Digicel Jamaica	Foreign
45	CNT	Corporacion Nacional de Telecomunicaciones	Foreign
46	Alpha Communications Network S.A.	Alpha Communications Network S.A.	Foreign
47	Altice Hispaniola, S.A.	Altice Hispaniola S.A.	Foreign
48	Millicom	Millicom International Services	Domestic
49	Claro Panama S.A.	Claro Panama S.A.	Foreign
50	Cable Onda Oriental	Cable Onda Oriental	Foreign
51	NAVEGA.COM	Navega.com S.A.	Foreign
52	Cablemas Telecomunicaciones, SA de CV	Cablemas Telecomunicaciones	Foreign

53	Fierce Capital	Fierce Capital Inc.	Foreign
54	Cable Onda, S.A.	Cable Onda S.A.	Foreign
55	Lazus	Lazus de Colombia SA	Foreign
56	CANTV	Compania Anonima Nacional Telefonos de Venezuela	Foreign
57	IDEAY	Equipos y Sistemas	Foreign
58	ALFANUMERIC	Alfanumeric SA	Foreign
59	Smitcoms	Smitcoms N.V.	Foreign
60	IBW	IBW Communications SA	Foreign
61	Caribe Wireless (FLASSH Communications)	Caribe Wireless (FLASSH Communications)	Foreign
62	SILVERADO	SILVERADO	Foreign
63	BW Telecom	BW Telecom S.R.L	Foreign
64	EMCALI	Empresas Municipales de Cali	Foreign
65	REDCA	Red Centroamericana de Telecomunicaciones	Foreign

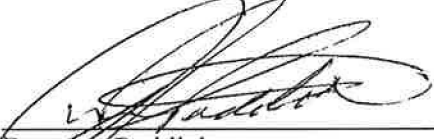
Attachment C

Capacity Sold or Leased to Digicel by CN (in STM-1s)	
As of December 31, 2014	
	IRUs
U.S. Cables:	
ARCOS-1	137
CFX-1	24
Non-U.S. Cables	
Fibralink	129

CERTIFICATION

On behalf of ARCOS-1 USA, Inc., Columbus Networks USA, Inc., and Columbus New Cayman Limited, I hereby certify that the foregoing filing, including its corresponding attachments, was prepared under my direction and control. I further certify under penalty of perjury that all statements therein are true, complete, and correct to the best of my knowledge and are made in good faith.

By:


Name: Brendan Paddick

Title: chief executive officer of ARCOS-1 USA, Inc. and Columbus Networks USA, Inc.
president and chief operating officer of Columbus New Cayman Limited

Date: July 9, 2015

CERTIFICATION

On behalf of Cable & Wireless Communications Plc, I hereby certify that the foregoing filing, including its corresponding attachments, was prepared under my direction and control. I further certify that all statements therein are true, complete, and correct to the best of my knowledge and are made in good faith. I certify under penalty of perjury that the foregoing is true.

By: C. Underwood

Name: Clare Underwood

Title: Company Secretary

Date: July 31, 2015