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June 2, 2015

**VIA ELECTRONIC FILING**

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

**Re: Applications of Columbus Networks, Limited and Cable & Wireless Pic 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 your Information Request dated May 19, 2015 (the “Information Request”),<sup>1</sup> Columbus New Cayman Limited,<sup>2</sup> Columbus Networks USA, Inc. and ARCOS-1 USA, Inc. (collectively, “Columbus USA”)<sup>3</sup> hereby submit the following information in relation to the above-referenced applications:

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<sup>1</sup> Capitalized terms used herein and not otherwise defined have the respective meanings ascribed to such terms in the Information Request.

<sup>2</sup> 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”).

<sup>3</sup> All references herein to “Columbus” mean collectively Columbus International Inc. (“CII”) and its foreign subsidiaries (other than Columbus USA). As noted in the Pro Forma Transfer, CII and its foreign subsidiaries were transferred to C&W on March 31, 2015. Columbus USA is owned by the same ultimate majority owners and controlling parties of CII prior to the Pro Forma Transfer. Thus, there has been no change to the ultimate control of Columbus USA.

1. For each of the submarine cable systems, provide for Columbus (a) the ownership interest and (b) the cable capacity held as of December 31, 2014. Provide the data as specified in Attachment A.

**Response.** *Please see Attachment A.*

U.S. Cable Systems:

America Movil (AMX1)  
Antillas 1  
ARCOS-1  
CFX-1  
MAYA-1  
Pacific Caribbean (PCCS)  
Taino-Carib

Non-U.S. Cable Systems:

ALBA-I  
BDSNi  
Caribbean Bermuda U.S. Network (CBUS)  
Cayman-Jamaica Fiber System (CJFS)  
Eastern Caribbean Fiber System (ECFS)  
East-West Cable None  
Fibralink

If the ownership or capacity held varies significantly by segment of the particular cable, please insert rows in the spreadsheet to provide data on a segment-by-segment basis.

2. Provide the data on current (as of December 31, 2014) and planned capacity (as of December 31, 2016) for each of the submarine cable systems listed below, as specified in Attachment B and indicate the source of the data.

**Response.** *Please see Attachment B.*

U.S. Cable Systems:

America Movil (AMX-1)  
Antillas 1  
ARCOS-1  
CFX-1  
MAYA-1  
Pacific Caribbean (PCCS)

Taino-Carib

Non-U.S. Cable Systems:

ALBA-I  
BDSNi  
Caribbean Bermuda U.S. Network (CBUS)  
Cayman-Jamaica Fiber System (CJFS)  
Eastern Caribbean Fiber System (ECFS)  
East-West Cable  
Fibralink

If the current or planned capacity varies significantly by segment of the particular cable, please insert rows in the spreadsheet to provide information on a segment-by-segment basis.

3. Identify any submarine cable system planned or proposed to be in service in the Caribbean region within the next two years. Provide detailed information such as planned landing points, planned capacity and proposed in-service dates, and indicate the source of the information. In addition, state whether Columbus has an investment in the submarine cable system, and, if so, the level of ownership that will be held.

**Response. *None to Columbus USA's knowledge.***

4. Provide a list of available terrestrial links between Haiti and the Dominican Republic, including the ownership of those links and provide:

**Response. *Each of Digicel and NATCOM S.A. (a consortium created in 2010 between Viettel Telecom (60%) (Vietnam's largest mobile operator) and the Government of Haiti (40%)) has built extensive fiber networks throughout Haiti including up to the border with the Dominican Republic in northern Haiti. Columbus USA does not have knowledge of how much capacity is available on these Haitian terrestrial fiber networks.***

***BW Telecom (a Dominican carrier controlled by Mr. Manny Lora), owns and operates a fiber optic network from the Haitian border with the Dominican Republic (where it connects with Digicel and NATCOM) to Puerto Plata, Dominican Republic. Puerto Plata is home to multiple subsea links to the U.S. and elsewhere, including AMX-1, ARCOS-1 and Fibralink. Columbus USA understands that Digicel has acquired one dark fiber pair from BW Telecom on this route. Hence, Columbus USA understands that Digicel has a robust terrestrial seamless platform from anywhere in Haiti to the Puerto Plata multi subsea network gateway. Columbus USA further understands that Digicel has the ability to port its capacity on the Kaliko Beach Haiti spur for use from Puerto Plata, Dominican Republic.***

***Columbus USA understands that NATCOM had leased services also from BW Telecom to seamlessly connect its fiber network in Haiti to the Puerto Plata subsea networks in the Dominican Republic. However, Columbus USA understands that NATCOM recently cancelled these services.***

***Other carriers in the Dominican Republic such as Trilogy (owners of Viva), Claro (America Movil) and other small integrators provide microwave links between Haiti and the Dominican Republic at their borders.***

- a. The capacity held by Columbus and how the capacity is held, e.g., ownership of the facility, long-term lease, short-term lease, etc.

**Response. *Neither Columbus USA nor Columbus holds any capacity on the terrestrial links in Haiti.***

- b. For each link, to the extent known, a list of other capacity providers and capacity holders, the amount of capacity held by each of these entities, and indicate the source of this information.

**Response. *Neither Columbus USA nor Columbus has this information.***

- c. Whether Columbus is having any problems, recent or ongoing, purchasing or accessing capacity on, or interconnecting with, terrestrial links between Haiti and the Dominican Republic. If so, explain what the access or interconnection impediments have been, such as capacity holders withholding capacity unless purchased at above cost-based rates.

**Response. *No.***

5. Provide the amount of capacity, listed by cable system, sold to Digicel by Columbus, on either an IRU or ICL basis. Provide the data as specified in Attachment C.

**Response. *Please see Attachment C.***

6. Provide information on whether holders of capacity in cable systems serving the markets listed below have the legal and practical right (1) to collocate equipment in cable landing stations owned or controlled by Columbus in those markets; and (2) to acquire, access and connect to backhaul facilities provided by Columbus and/or other third parties, in those markets at cost-based rates.

1. Anguilla

**Response. *Neither Columbus USA nor Columbus has any presence in this market.***

2. British Virgin Islands

**Response.** *Neither Columbus USA nor Columbus has any presence in this market.*

3. Cayman Islands

**Response.** *Neither Columbus USA nor Columbus has any presence in this market.*

4. Dominican Republic

**Response.** *Columbus USA has no presence in this market. Columbus sells collocation space at system landing stations and backhaul in the Dominican Republic at market rates. In addition to Columbus, there are several other providers of collocation and backhaul facilities in the Dominican Republic, including Codetel (America Movil), Orange/Altice and Wind Telecom.*

5. Haiti

**Response.** *Columbus USA has no presence in this market. Columbus resells collocation space and backhaul from Digicel to its customers in Haiti at market rates. In addition to Columbus, there are other providers of collocation and backhaul facilities in the Haiti, including Digicel. As previously noted to the Commission, Fibralink's cable landing station in Haiti is owned and operated by Digicel.*

6. Jamaica

**Response.** *Columbus USA has no presence in this market. Columbus sells collocation space at landing stations and backhaul in Jamaica at market rates. In addition to Columbus, there are other providers of collocation and backhaul facilities in Jamaica, including Telecomunicaciones Grand Caribe (operator of the ALBA-1 Cable).*

7. Turks and Caicos ("T&C")

**Response.** *Columbus USA has no presence in this market. Columbus sells collocation space at market rates at the T&C landing station, but Columbus does not own any backhaul in T&C.*

Denise Coca  
June 2, 2015  
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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)

Eric Fishman  
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400 Central Park West 3R  
New York, New York 10025  
(via e-mail)

Patrick S. Campbell  
Counsel to Cable & Wireless Communications Plc  
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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		Capacity Thru Ownership	Net IRUs	Net Inter-Carrier Leaseholds	Net Capacity Held	Activated Capacity	Non-Activated Capacity
	as of 12/31/2014		(a)	(b)	(c)	(d) =(a)+(b)+(c) (d) = (e) +(f)	(e)	(f)
<b>U.S. Cables:</b>								
America Movil (AMX1)	0%		0	0	0	0	0	0
Antillas 1	0%		0	0	0	0	0	0
ARCOS-1	96%		9400	-4404	0	4996	4589	407
CFX-1	100%		10112	-3731	0	6381	4410	1971
MAYA -1	less than 1%		153	-1	0	152	10	142
Pacific Caribbean (PCCS)	0%		0	0	0	0	0	0
Taino-Carib	0%		0	0	0	0	0	0
<b>Non-U.S. Cables</b>								
ALBA -1	0%		0	0	0	0	0	0
BDSNi	0%		0	0	0	0	0	0
Caribbean Bermuda U.S. Network (CBUS)	0%		0	0	0	0	0	0
Cayman-Jamaica Fiber System (CJFS)	0%		0	0	0	0	0	0
Eastern Caribbean Fiber System (ECFS)	0%		0	0	0	0	0	0
East - West Cable	0%		0	0	0	0	0	0
Fibralink	100%		448	-144	0	304	224	80

## Attachment B

<b>Columbus Networks, Limited</b>				
Data Request				
	<b>Cable Capacity (in Gbps)</b>			
	Current	Source of	Planned	Source of
Columbus internal information	as of 12/31/2014	Capacity Data	as of 12/31/2016	Capacity Data
<b>U.S. Cables:</b>				
America Movil (AMX1)	1000	Telegeography/Rawle Study	1960	Telegeography/Rawle Study
Antillas 1	3.7	Telegeography/Rawle Study	10	Telegeography/Rawle Study
ARCOS-1	1,468	Columbus internal information	1,748	Columbus internal information
CFX-1	1,580	Columbus internal information	1,780	Columbus internal information
MAYA -1	512	Telegeography/Rawle Study	1200	Telegeography/Rawle Study
Pacific Caribbean (PCCS)	1000	Telegeography/Rawle Study	1960	Telegeography/Rawle Study
Taino-Carib	3.9	Telegeography/Rawle Study	3.9	Telegeography/Rawle Study
<b>Non-U.S. Cables</b>				
ALBA -1	112	Telegeography/Rawle Study	307	Telegeography/Rawle Study
BDSNi*	30	Columbus internal information	30	Columbus internal information
Caribbean Bermuda U.S. Network (CBUS)**	160	Columbus internal information	380	Columbus internal information
Cayman-Jamaica Fiber System (CJFS)	40	Columbus internal information	140	Columbus internal information
Eastern Caribbean Fiber System (ECFS)	182	Telegeography/Rawle Study	260	Telegeography/Rawle Study
East-West Cable	40	Columbus internal information	160	Columbus internal information
Fibralink	70	Columbus internal information	70	Columbus internal information

**BDSNi Bahamas-Haiti segment only other links are Intra-Bahamas \***

**Segment 1 and Segment 2 of CBUS\*\***



## Attachment C

<b>Columbus Networks, Limited</b> <b>Capacity Sold or Leased to Digicel by Cable</b> <b>(in STM-1s)</b>		
Data Request		
	IRUs	Inter-Carrier Leaseholds
<b>U.S. Cables:</b>		
America Movil (AMX1)	None	None
Antillas 1	None	None
ARCOS-1	11	None
CFX-1	3	None
MAYA -1	1	None
Pacific Caribbean (PCCS)	None	None
Taino-Carib	None	None
<b>Non-U.S. Cables</b>		
ALBA -1	None	None
BDSNi	None	None
Caribbean Bermuda U.S. Network (CBUS)*	1	None
Cayman-Jamaica Fiber System (CJFS)	None	None
Eastern Caribbean Fiber System (ECFS)	None	None
East - West Cable	None	None
Fibralink	5	None

IRU capacity purchased from Cable & Wireless \*

**CERTIFICATION**

On behalf of ARCOS-1 USA, Inc., Columbus Networks USA, Inc., and Columbus New Cayman Limited, I hereby certify that the foregoing Information Request response, 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: 

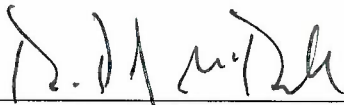
Name: Brendan Paddick

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: June 2, 2015

**CERTIFICATION**

On behalf of Columbus Networks, Limited, I hereby certify that the foregoing Information Request response, 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: Perley McBride  
Title: Director

Date: June 2, 2015