



Federal Communications Commission
Washington, D.C. 20554

May 19, 2015

Via Electronic Mail

Patrick S. Campbell
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, N.W., Suite 500
Washington, D.C. 20006

Counsel to Cable & Wireless Communications Plc

Re: Applications of Columbus Networks, Limited and Cable & Wireless 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 Mr. Campbell:

On November 21, 2014, Columbus Networks, Limited (Columbus) (replaced by Columbus New Cayman Limited as transferor)¹ and Cable & Wireless Communications Plc (Cable and Wireless) on behalf of themselves and their affiliates (all together, the "Applicants") submitted the applications referenced above to the Commission for consent to transfer control of various Commission licenses and authorizations pursuant to section 214 of the Communications Act of 1934, as amended (the "Act"),² the Cable Landing License Act,³ and sections 1.767 and 63.24 of the Commission's rules.⁴ For the Commission to complete its review of the applications and make the necessary public interest findings, we require additional information and clarification of certain matters discussed in the applications and other information submitted to the Commission.

Accordingly, pursuant to sections 4(i), 4(j), 214, and 403 of the Act, the Cable Landing License Act, and sections 1.767, 63.18, 63.24, and 63.51 of the Commission's rules,⁵ we request that Cable & Wireless provide written responses and data information set forth in the attached information request and data spreadsheet attachments (A, B, and C) and, where appropriate, amend the applications to reflect such responses. Information, data and narrative responses

¹ See *Notification of Pro Forma Transfer and Minor Amendment to Applications*, SCL-T/C-20150421-00010, *et al.* (filed April 21, 2015).

² 47 U.S.C. § 214.

³ Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39. See also Executive Order No. 10530, Exec. Ord. No. 10530 *reprinted as amended* in 3 U.S.C. § 301.

⁴ 47 C.F.R. §§ 1.767, 63.24.

⁵ 47 U.S.C. §§ 34-39, 154(i), 154(j), 214, 403; 47 C.F.R. §§ 1.767, 63.18, 63.24, 63.51.

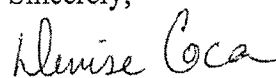
Federal Communications Commission

called for by the requests should identify the request to which they are responsive. A certification stating that the responses and data submitted were prepared under and reviewed by the certifying party must accompany the submission. Please provide the name, title and address of each individual signing the certification.

Please provide your responses no later than Tuesday, June 2, 2015. Your responses should be filed electronically through the International Bureau Filing System (IBFS). In addition, please also serve the documents, including the spreadsheets in Excel format, via e-mail to David Krech, david.krech@fcc.gov, and Jodi Cooper, jodi.cooper@fcc.gov.

If you have any questions concerning this matter, please contact David Krech or Jodi Cooper of the International Bureau Policy Division, at (202) 418-7443 or (202) 418-2064, respectively.

Sincerely,



Denise Coca
Chief, Policy Division
International Bureau

Attachments:

Information Request
Data Spreadsheet Attachments A, B, and C

cc: Eric Fishman
Counsel to Digicel International
400 Central Park West 3R
New York, New York 10025
(via email)

Ulises R. Pin
Counsel to Columbus Networks USA, Inc.
Morgan Lewis & Bockius, LLP
2020 K Street, N.W.
Washington, D.C. 20006
(via email)

Attachment A

Data Request		Cable & Wireless Communications Plc						
		Cable Ownership (%)		Cable Capacity Holdings (in STM-1s) as of 12/31/2014				
	Current as of 12/31/2014	Capacity Thru Ownership (a)	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:								
America Movil (AMX1)								
Antillas 1								
ARCOS-1								
CFX-1								
MAYA -1								
Pacific Caribbean (PCCS)								
Taino-Carib								
Non-U.S. Cables								
ALBA -1								
BDSNI								
Caribbean Bermuda U.S. Network (CBUS)								
Cayman-Jamaica Fiber System (C-JFS)								
Eastern Caribbean Fiber System (ECFS)								
East - West Cable								
Fibralink								

Attachment B

Data Request		Cable Capacity (in Gbps)			
		Current as of 12/31/2014	Source of Capacity Data	Planned as of 12/31/2016	Source of Capacity Data
U.S. Cables:					
America Movil (AMX1)					
Antillas 1					
ARCOS-1					
CFX-1					
MAYA -1					
Pacific Caribbean (PCCS)					
Taino-Carib					
Non-U.S. Cables					
ALBA -1					
BDSNI					
Caribbean Bermuda U.S. Network (CBUS)					
Cayman-Jamaica Fiber System (CJFS)					
Eastern Caribbean Fiber System (ECFS)					
East-West Cable					
Fibralink					

Attachment C

Cable & Wireless Communications Plc.

Capacity Sold or Leased to Digicel by Cable (in STM-1s)

Data Request

	IRUs	Inter-Carrier Leaseholds
U.S. Cables:		
America Movil (AMX1)		
Antillas 1		
ARCOS-1		
CFX-1		
MAYA -1		
Pacific Caribbean (PCCS)		
Taino-Carib		
Non-U.S. Cables		
ALBA -1		
BDSNi		
Caribbean Bermuda U.S. Network (CBUS)		
Cayman-Jamaica Fiber System (CJFS)		
Eastern Caribbean Fiber System (ECFS)		
East - West Cable		
Fibralink		

INFORMATION REQUEST
FOR
CABLE & WIRELESS COMMUNICATIONS PLC

ITC-T/C-20141121-00304
ITC-T/C-20141121-00307
SCL-T/C-20141121-00013
SCL-T/C-20141121-00014

May 19, 2015

Information Request

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

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
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 Cable & Wireless has an investment in the submarine cable system, and, if so, the level of ownership that will be held.
4. Provide a list of available terrestrial links between Haiti and the Dominican Republic, including the ownership of those links and provide:
 - a. The capacity held by Cable & Wireless and how the capacity is held, *e.g.*, ownership of the facility, long-term lease, short-term lease, etc.
 - 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.
 - c. Whether Cable & Wireless 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.
5. Provide the amount of capacity, listed by cable system, sold to Digicel by Cable & Wireless, on either an IRU or ICL basis. Provide the data as specified in 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 Cable & Wireless in those markets; and (2) to acquire, access and connect to backhaul facilities provided by Cable & Wireless and/or other third parties, in those markets at cost-based rates.

Anguilla
British Virgin Islands
Cayman Islands
Dominican Republic
Haiti
Jamaica
Turks and Caicos

13. **STM-1** stands for Synchronous Transport Module level-1, and is the standard commercial unit for the sale and leasing of capacity, rounded to one decimal place. The STM-1 is an ITU fiber optic network transmission standard, which has a bit rate of 155.52 Mbps.

14. **U.S. Submarine Cable System** is a submarine cable system extending between the United States, including U.S. offshore points, and a foreign point. A submarine cable system that does not connect to the United States or a U.S. point is a non-U.S. submarine cable system.