



NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

Robert L. Hoegle  
(Admitted in DC & NY)  
T 202.689.2816 F 202.689.2836  
bob.hoegle@nelsonmullins.com

101 Constitution Avenue, NW | Suite 900  
Washington, DC 20001  
T 202.689.2800 F 202.689.2860  
nelsonmullins.com

March 19, 2018

**Via Electronic Filing**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: ITC-T/C-20180227-00044  
ITC-T/C-20180227-00045  
ITC-T/C-20180227-00047  
SCL-T/C-20180227-00003  
SCL-T/C-20180227-00004  
SCL-T/C-20180227-00005  
Notification of Pro Forma Transfer of Control

SCL-ASG-20170306-00005  
SCL-ASG-20170306-00006  
SCL-T/C-20151130-00033  
SCL-T/C-20151130-00034  
SCL-T/C-20151130-00035  
SCL-T/C-20151130-00036  
Prior Application File Nos.

Dear Ms. Dortch:

This is in response to the request for clarification of Jodi Cooper on March 14 regarding the above-referenced assignment and transfer of control applications.

Exhibit 3 to Application File Nos. SCL-ASG-20170306-00005 and SCL-ASG-20170306-00006, filed on March 6, 2017; the CWC New Cayman Limited Post-Transaction Structure Exhibit to Application File Nos. SCL-T/C-20151130-00033 and SCL-T/C-20151130-00034, filed on November 30, 2015; and the Columbus Licensees Post-Transaction Structure Exhibit to Application File Nos. SCL-T/C-20151130-00035 and SCL-T/C-20151130-00036, also filed on November 30, 2015, listed "Coral New

Ms. Marlene H. Dortch, Secretary  
March 19, 2018  
Page 2

UKCo Ltd.” in the post-transaction ownership structure of the respective submarine cable landing licensees.

The inclusion of Coral New UKCo Ltd. in the foregoing assignment and transfer of control application exhibits was an inadvertent error. Although the inclusion of Coral New UKCo Ltd. originally had been contemplated in the restructuring, it was not included in the ownership structure. However, it was not removed from the post-transaction structure charts. This error was discovered in connection with the currently-reported transaction and corrected in the post-transaction structure charts included with the Notification of *Pro Forma* Transfer of Control, filed on January 26, 2018, under the above-referenced Application File Nos.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Robert L. Hoegle

RLH:tfb

cc: Mr. David Krech  
Ms. Jodi Cooper