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September 27, 2021

VIA IBFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, N.E.
Washington, DC 20554
Attn: International Bureau

Re: Notification Regarding the *Pro Forma* Change in Ownership of CWC New Cayman Limited, Columbus Networks Telecommunications Services USA, Inc., and Cable & Wireless Puerto Rico Inc.

Dear Secretary Dortch:



CWC New Cayman Limited ("CWC New Cayman"), Columbus Networks Telecommunications Services USA, Inc. ("CNTS"), and Cable & Wireless Puerto Rico Inc. ("CWPR") (together, the "Licensees"); and Liberty Latin America Ltd. ("Parent" and together with Licensees, the "Parties"), pursuant to 47 C.F.R. § 63.24(f), notify the Commission of a *pro forma* change that resulted in a change in Licensees' intermediate ownership and control structure, with no change to its ultimate owner.

In particular, as further explained in Attachment 1, effective as of January 10, 2020, there are two new intermediate holding companies between Parent and Licensees, C&W Senior Secured Parent Limited and C&W Senior Finance Limited. However, because the ultimate control and ownership of Licensees did not change, the *Pro Forma Change* (as defined in Attachment 1) was as *pro forma* in nature.

Licensees respectfully request a waiver of Section 63.24(f) of the Commission's rules, which require the filing of a notification of a *pro forma* transfer of control no later than thirty days after the transfer is completed. Due to an inadvertent administrative oversight, Licensees did not file notice within the specified timeframe. Licensees appreciate the need for prompt notification of any *pro forma* transfer of control and regrets causing any inconvenience by not filing notice within the specified time period. Licensees also submit that grant of the waiver is in the public interest because it will ensure the accuracy of the Commission's records.

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Information Required by Section 63.24(f)(2)

As required by Sections 63.03(d)(2) and 63.24(f)(2), the Parties provide the following information required by 47 C.F.R. §§ 63.04 and 63.18:

Sections 63.18(a); 63.04(a)(1): Name, address and telephone number of the Parties:

Columbus Networks Telecommunications Services USA, Inc. **FRNs 0014788749, 0025080003**

Cable & Wireless Puerto Rico Inc. **FRNs 0019248095, 0020821419**
15950 West Dixie Highway
North Miami Beach, FL 33162
Phone:(786) 274-7400
Fax: (786) 274-7402

CWC New Cayman Limited **FRNs 0026321422, 0025084997**
94 Solaris Avenue
Camana Bay
Grand Cayman KY1-1108, Cayman Islands

Liberty Latin America Ltd.
Clarendon House
2 Church Street
Hamilton HM11 Bermuda

C&W Senior Secured Parent Limited
C&W Senior Finance Limited
PO Box 309, Ugland House
Grand Caymen, KY1-1104

Sections 63.18(b); 63.04(a)(2): Organization of the Parties:

CWC New Cayman is organized under the laws of the Cayman Islands.

CNTS is organized under the laws of Delaware.

CWPR is organized under the laws of Puerto Rico.

Liberty Latin America Ltd. is organized under the laws of Bermuda.

C&W Senior Secured Parent Limited is organized under the laws of the Cayman Islands.

C&W Senior Finance Limited is organized under the laws of the Cayman Islands.

Section 63.18(c); 63.01(a): Correspondence concerning this filing should be sent to the Parties' counsel:

Ulises R. Pin
Stephany Fan
Morgan, Lewis and Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20006-1806
202-373-6000 (Tel)
202-373-6001 (Fax)
ulises.pin@morganlewis.com
stephany.fan@morganlewis.com

Section 63.18(d): Licensees hold the following international Section 214 authorizations and submarine cable landing licenses:

CWC New Cayman holds international Section 214 authority to provide global resale and facilities-based services granted in IB File No. ITC-214-20100512-00191.

CNTS holds international Section 214 authority to provide global resale and facilities-based services granted in IB File No. ITC-214-20070220-00077.

CWPR holds international Section 214 authority to provide global or limited global resale and facilities-based services granted in IB File No. ITC-214-20091127-00497.

Licensees are also authorized to provide interstate service by virtue of blanket domestic Section 214 authority. See 47 C.F.R. § 63.01.

Neither Parent, C&W Senior Secured Parent Limited, nor C&W Senior Finance Limited hold any authorizations from the FCC.

Sections 63.18(h); 63.04(a)(4): See **Attachment 1** for the current ownership of Licensees and a description of the *Pro Forma Change*. See **Attachment 2** for charts depicting the pre-*Pro Forma Change* and current corporate ownership structure of Licensee.

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The Parties certify that the *Pro Forma Change* was *pro forma*, and did not result in a change in the ultimate control of the Licensees or the authorizations held by the Licensees.

* * * *

This notification letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Ulises R. Pin

Ulises R. Pin
Stephany Fan

Counsel for the Parties

ATTACHMENT 1

Answer to Question 11 - Section 63.18(h) and 63.04(a)(4) Ownership Information

The following entities currently hold, directly or indirectly, a 10% or greater interest¹ CWC New Cayman Limited ("CWC New Cayman"), Columbus Networks Telecommunications Services USA, Inc. ("CNTS"), and Cable & Wireless Puerto Rico Inc. ("CWPR") (together, the "Licensees"), as calculated pursuant to the Commission's ownership attribution rules for international telecommunications carriers.

The following entities holds 100% of the voting and equity interest in CWC New Cayman:

Cable & Wireless Communications, Inc.
15950 West Dixie Highway
North Miami Beach, FL 33162
Jurisdiction: Virginia
Business: Telecommunications provider
Interest: Direct interest of 100% in CWC New Cayman

The following entities holds 100% of the voting and equity interest in Cable & Wireless Communications, Inc.:

Cable and Wireless (West Indies) Limited
Griffin House, 161 Hammersmith Road,
London, United Kingdom, W6 8BS
Jurisdiction: England
Business: Holding company
Interest: Indirect interest of 100% in CWC New Cayman

The following entities holds 100% of the voting and equity interest in Cable and Wireless (West Indies) Limited:

CWIGroup Limited
Griffin House, 161 Hammersmith Road,
London, United Kingdom, W6 8BS
Jurisdiction: England
Business: Holding company
Interest: Indirect interest of 100% in CWC New Cayman

Sable Holding Limited holds 100% of the voting and equity interest in CWIGroup Limited. A description of the corporate ownership structure from Sable Holding Limited up through ultimate parent company Liberty Latin America is set forth below. Each of these entities holds an indirect 100% in CWC New Cayman.

The following entity holds 100% of the voting and equity interest in CNTS:

¹ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

A.SUR Net, Inc.
15950 West Dixie Highway
North Miami Beach, FL 33162
Phone:(786) 274-7400
Fax: (786) 274-7402

The following entity holds 100% of the voting and equity interest in A.SUR Net Inc. and Columbus Networks USA, Inc.

ARCOS-1 USA, Inc.
15950 West Dixie Highway
North Miami Beach, FL 33162
Phone:(786) 274-7400
Fax: (786) 274-7402

The following entities holds 100% of the voting and equity interest in each of CWPR and ARCOS-1 USA, Inc.:

Columbus New Cayman Limited
94 Solaris Avenue
Camana Bay
Grand Cayman KY1-1108, Cayman Islands
Jurisdiction: Cayman Islands
Business: Holding company
Interest: Direct interest of 100% in CWPR and indirect interest of 100% in CNTS as shown in Attachment 2.

The following entity holds 99%² of the voting and equity interest in Columbus New Cayman Limited:

Columbus Networks, Limited
Windsor Lodge, Government Hill
St. Michael, Barbados
Jurisdiction: Barbados
Business: International telecommunications services
Interest: Indirect 100% interest in CWPR and CNTS.

The following entity holds 100% of the voting and equity interest in Columbus Networks, Limited:

Columbus TTNW Holdings Inc.
Windsor Lodge, Government Hill

² Columbus Networks (Cayman) Holdco Limited, Windsor Lodge, Government Hill, St. Michael Barbados, BB11000 (Jurisdiction: Barbados; Business: Holding company) owns 1% of Columbus New Cayman Limited. Columbus Networks Limited (described above) in turn holds 100% of the voting and equity interests in Columbus Networks (Cayman) Holdco Limited.

St. Michael, Barbados
Jurisdiction: Barbados
Business: International telecommunications services
Interest: Indirect 100% interest in CWPR and CNTS.

The following entity holds 100% of the voting and equity interest in Columbus TTNW Holdings Inc.:

Columbus International Inc.
Suites 205-207 Dowell House
Cr. Roebuck & Palmetto Street, Bridgetown, Barbados
Jurisdiction: Barbados
Business: International telecommunications services
Interest: Indirect 100% interest in CWPR and CNTS.

The following entity holds 100% of the voting and equity interest in Columbus International Inc.:

Sable Holding Limited
Griffin House
161 Hammersmith Road
London, W6 8BS
Jurisdiction: England
Business: Holding company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in Sable Holding Limited:

C&W Senior Secured Parent Limited
PO Box 309, Uglan House
Grand Caymen, KY1-1104
Jurisdiction: Cayman Islands
Business: Holding company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in C&W Senior Secured Parent Limited:

C&W Senior Finance Limited
PO Box 309, Uglan House
Grand Caymen, KY1-1104
Jurisdiction: Cayman Islands
Business: Holding company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in C&W Senior Finance Limited:

Cable & Wireless Limited
Griffin House
161 Hammersmith Road
London, W6 8BS
Jurisdiction: England
Business: Holding company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% voting and equity interest in Cable & Wireless Limited:

Cable & Wireless Communications Limited
Griffin House
161 Hammersmith Road
London, W6 8BS
Jurisdiction: England
Business: International telecommunications services
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in Cable & Wireless Communications Limited:

LGE Coral Holdco Limited
Griffin House, 161 Hammersmith Road
London, United Kingdom W6 8BS
Jurisdiction: England
Business: Holding Company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in LGE Coral Holdco Limited:

Liberty CWC Holdings Limited
Windsor Lodge
Government Hill
St Michael, Barbados
Jurisdiction: Barbados
Business: Holding company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in Liberty CWC Holdings Limited:

LILAC Services Ltd.
2 Church Street

Hamilton HM11 Bermuda
Jurisdiction: Bermuda
Business: Holding company
Interest: Indirect 100% interest in Licensees.

The following entity holds 100% of the voting and equity interest in LiLAC Services Ltd.:

Liberty Latin America Ltd.
Clarendon House
2 Church Street
Hamilton HM11 Bermuda
Jurisdiction: Bermuda
Business: International provider of cable and telecommunications services
Interest: Indirect 100% interest in Licensees.

The following persons and/or entities have a shareholding greater than 10 percent of the voting and/or equity interest in Liberty Latin America Ltd.:

John C. Malone
c/o 1550 Wewatta Street
Suite 710
Denver, Colorado 80202
Citizenship: United States
Business: Cable and telecommunications services
Equity Interest: 15%
Voting Interest: 31%

Other than as set forth above, there are no individuals or entities that would have a 10 percent or greater voting or equity interest in Licensees as a result of their voting or equity interest in Liberty Latin America Ltd.

To the Parties' knowledge, no other person or entity, directly or indirectly, owns or controls a 10% or greater interest in Licensee.

Answer to Question 12 - Section 63.18(h) Interlocking Directorates

Licensee do not have any interlocking directorates with a foreign carrier.

Answer to Question 13 - Description of the *Pro Forma* Change

Through a series of intercorporate transactions, the *Pro Forma Change* involved the insertion of two intermediate holding companies, C&W Senior Secured Parent Limited and C&W Senior Finance Limited, between Licensees and Parent (the "*Pro Forma Change*"). As a result of

the *Pro Forma Change*, Licensees became indirect, wholly owned subsidiaries of C&W Senior Secured Parent Limited and C&W Senior Finance Limited. Each of C&W Senior Secured Parent Limited and C&W Senior Finance Limited is and remains an indirect, wholly owned subsidiary of Parent; Licensees, therefore, remains indirect, wholly owned subsidiaries of Parent.

Charts depicting the pre-*Pro Forma Change* and current ownership structure of Licensees are attached as **Attachment 2**.

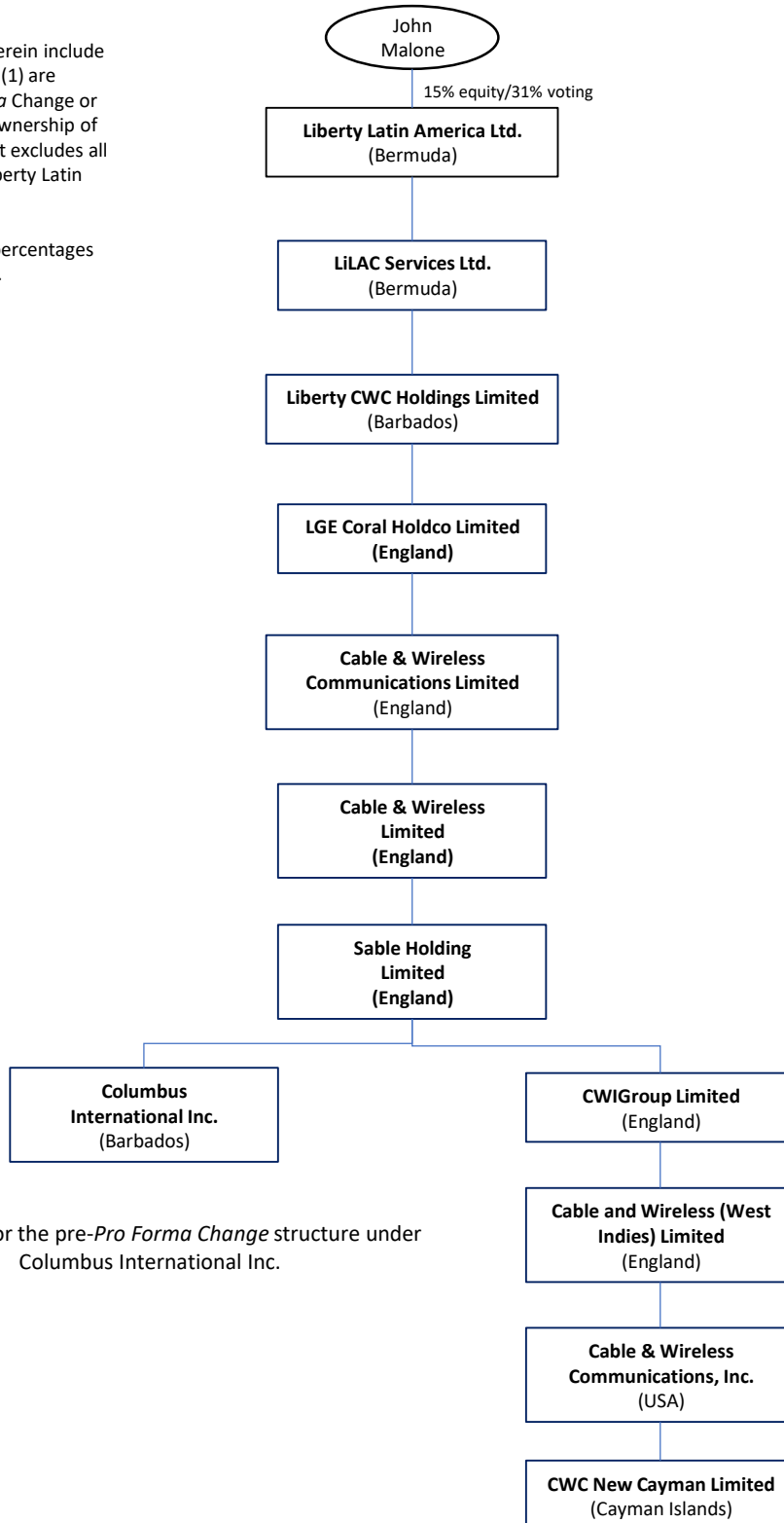
ATTACHMENT 2

Pre-*Pro Forma Change* and Current Corporate Ownership Structure Charts

Pre-Pro Forma Change Structure

* The entities listed herein include only those entities that (1) are parties to the *Pro Forma* Change or (2) are in the chain of ownership of those entities. The chart excludes all other subsidiaries of Liberty Latin America Ltd.

All ownership/control percentages are 100%, unless noted.

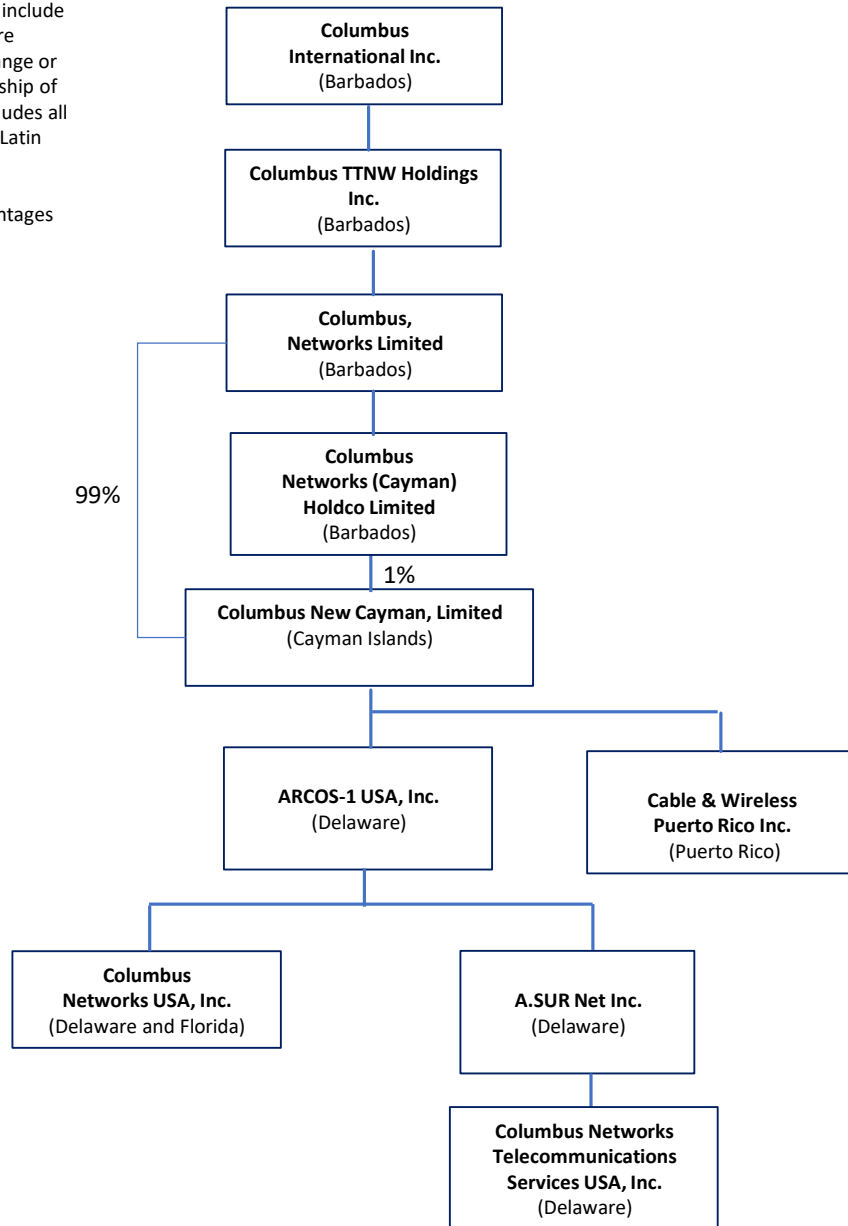


See Page 2 for the pre-Pro Forma Change structure under Columbus International Inc.

Pre-Pro Forma Change Structure

* The entities listed herein include only those entities that (1) are parties to the *Pro Forma* Change or (2) are in the chain of ownership of those entities. The chart excludes all other subsidiaries of Liberty Latin America Ltd.

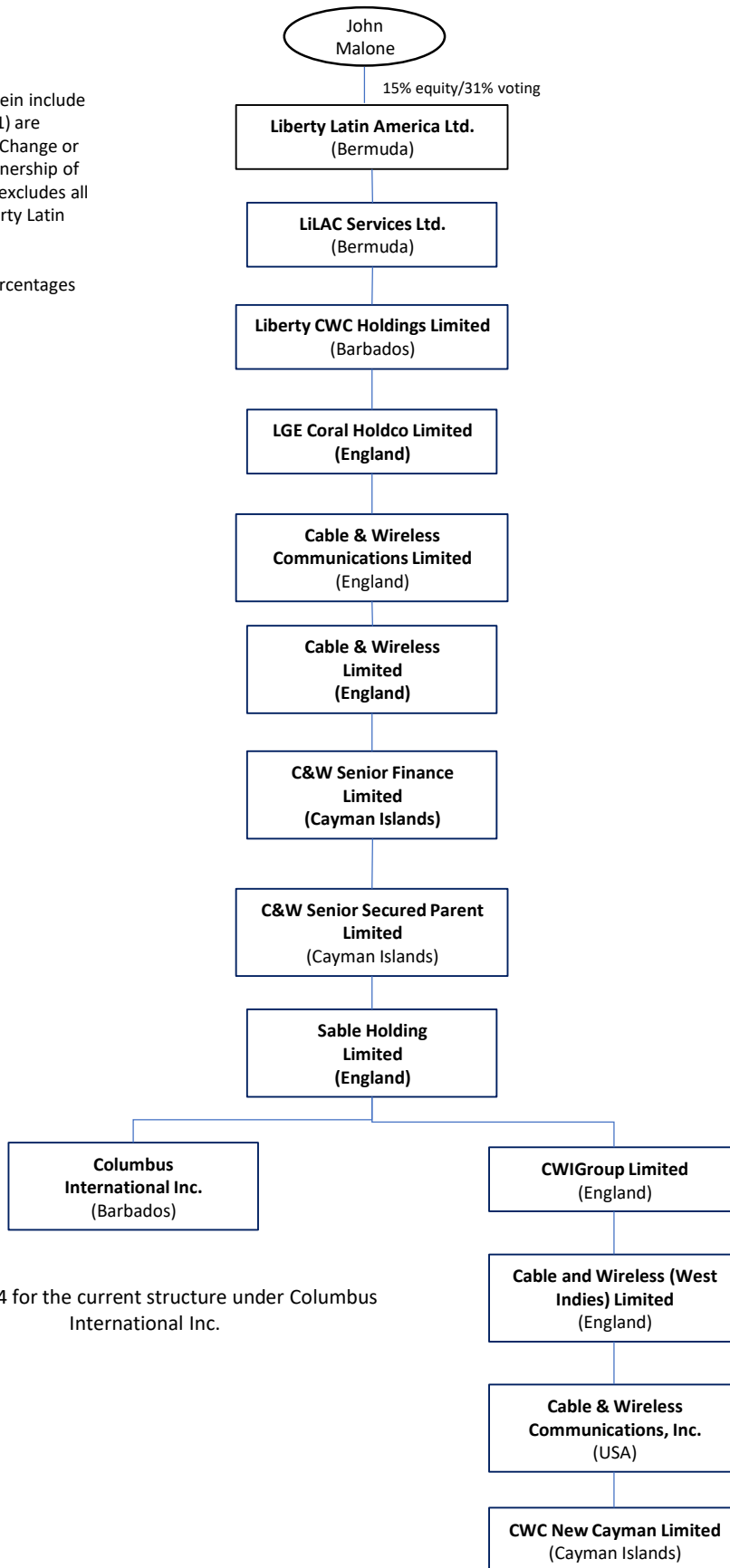
All ownership/control percentages are 100%, unless noted.



Current Structure

* The entities listed herein include only those entities that (1) are parties to the *Pro Forma* Change or (2) are in the chain of ownership of those entities. The chart excludes all other subsidiaries of Liberty Latin America Ltd.

All ownership/control percentages are 100%, unless noted.

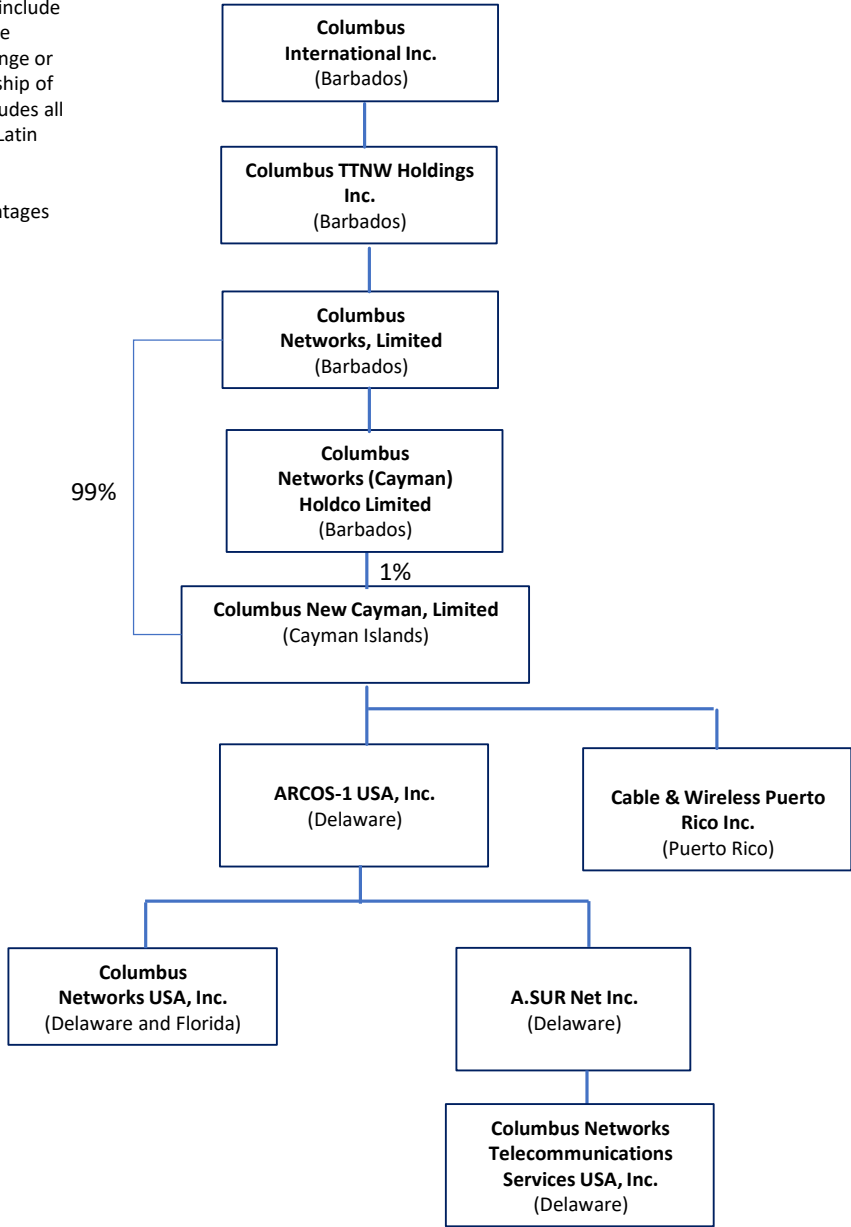


See Page 4 for the current structure under Columbus International Inc.

Current Structure

* The entities listed herein include only those entities that (1) are parties to the *Pro Forma* Change or (2) are in the chain of ownership of those entities. The chart excludes all other subsidiaries of Liberty Latin America Ltd.

All ownership/control percentages are 100%, unless noted.



VERIFICATION

I, Christopher Barrett Coles, hereby declare that I am Director of Columbus Networks Telecommunications Services USA, Inc. and Cable & Wireless Puerto Rico Inc. (together, the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of September, 2021.

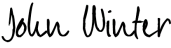
DocuSigned by:
Chris Coles
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Christopher Barrett Coles
Director
Columbus Networks Telecommunications
Services USA, Inc.
Cable & Wireless Puerto Rico Inc.

VERIFICATION

I, John Michael Winter, hereby declare that I am Vice President and Secretary of Liberty Latin America Ltd. (together, the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of September, 2021.

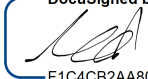
DocuSigned by:

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John Michael Winter
Vice President and Secretary
Liberty Latin America Ltd.

VERIFICATION

I, Leah Helena Pegg, hereby declare that I am Director of C&W Senior Secured Parent Limited and C&W Senior Finance Limited (together, the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of September, 2021.

DocuSigned by:

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Leah Helena Pegg
Director
C&W Senior Secured Parent Limited
C&W Senior Finance Limited

VERIFICATION

I, Ruchi Kaushal, hereby declare that I am Director of CWC New Cayman Limited (the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of September, 2021.

DocuSigned by:
Ruchi Kaushal
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Ruchi Kaushal
Director
CWC New Cayman Limited