

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
GU HOLDINGS INC., EDGE CABLE	)	File No. SCL-LIC-20170421-00012
HOLDINGS USA, LLC and PACIFIC LIGHT	)	
DATA COMMUNICATION CO. LTD.	)	
	)	
Application for a License to Construct, Land,	)	
and Operate an Undersea Fiber Optic Cable	)	
Connecting the United States, Hong Kong,	)	
Taiwan, and the Philippines	)	

**AMENDMENT TO APPLICATION  
FOR A CABLE LANDING LICENSE**

Pursuant to Section 1.65 of the Commission’s rules, 47 C.F.R. § 1.65, GU Holdings Inc. (“GU Holdings”), Edge Cable Holdings USA, LLC (“Edge USA”), and Pacific Light Data Communication Co. Ltd. (“PLDC”) (collectively, the “Applicants”), file this amendment to their application for a license to land and operate a non-common carrier fiber-optic submarine telecommunications cable extending between the United States, Hong Kong, Taiwan, and the Philippines (“Application”). The submarine cable is known as the Pacific Light Cable Network (“PLCN”). The Application was accepted for filing on November 1, 2017.<sup>1</sup>

On December 4, 2017, Dr. Peng Holding Hong Kong Limited acquired 93 percent of the shares of PLD Holdings Limited, the parent company of PLDC. Dr. Peng Holding Hong Kong Limited is a subsidiary of Dr. Peng Telecom & Media Group Co., Ltd., which is a publicly-traded company based in Beijing, China. PLDC has revised Appendix D to the

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<sup>1</sup> Public Notice, *Streamlined Submarine Cable Landing License Applications Accepted for Filing*, Report No. SCL-00204S (rel. Nov. 1, 2017).

Application, specifically its responses to 47 C.F.R §§ 63.18(h) and 1.767(a)(8)(iii), to reflect this change to its ownership structure. All other information for PLDC, the other Applicants, and the PLCN cable remains the same.

Please contact the undersigned at selmer@google.com if you have any questions regarding this filing.

Respectfully submitted,



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Stephanie Selmer  
Counsel for GU Holdings Inc.

Dated: December 27, 2017

**AMENDED APPENDIX D**  
**FOR PACIFIC LIGHT DATA COMMUNICATIONS CO. LTD.**

**APPENDIX D**

**PACIFIC LIGHT DATA COMMUNICATION CO., LIMITED**

Pacific Light Data Communication Co., Ltd. (PLDC), which was founded in 2015 in Hong Kong in the heart of Asia, is set to become a leading communications service provider in the region. PLDC's first project, the Pacific Light Cable Network (PLCN), will be the first subsea cable directly connecting Hong Kong and the United States. PLCN includes the C+L technology, providing high speed, low latency, and more secure bandwidth to all Internet users. Neither PLDC nor any of its affiliates hold any FCC licenses.

**INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)**

**(1) Name, Address and Telephone Number of the Applicant:**

Pacific Light Data Communication Co., Ltd. FRN Number: 0026037341  
Unit 1705-1706, 17/F, One Peking, 1 Peking Road,  
Tsim Sha Tsui, Kowloon, Hong Kong  
+852 2682 6369

**(2) Place of Formation:**

PLDC is a private company limited by shares organized under the laws of Hong Kong, Companies Ordinance Chapter 622H.

**(3) Points of Contact:**

Correspondence concerning the application should be sent to the following:

Tsang, Yu Hoi  
Administration Manager  
Unit 1705-1706, 17/F, One Peking, 1 Peking Road,  
Tsim Sha Tsui, Kowloon, Hong Kong  
+852 2682 6369  
christsang@pldcglobal.com

**INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)**

**(1) Information Requested by 47 C.F.R. § 63.18(h):**

PLDC is 100% owned by PLD Holdings Limited:

Name: PLD Holdings Limited  
Address: P.O. Box 3340 Road Town, Tortola, British Virgin Islands  
Citizenship: British Virgin Islands  
Principal Business: Holding company

PLD Holdings Limited is owned by Dr Peng Holding Hong Kong Limited & China Culture Silicon Valley Limited:

Name: Dr Peng Holding Hong Kong Limited  
Address: Level 54, Hopewell Centre, 183 Queen's Road East, Hong Kong  
Ownership: 93%  
Citizenship: Hong Kong  
Principal Business: Holding company

Dr Peng Holding Hong Kong Limited is 100% owned by Dr. Peng Telecom & Media Group Co., Ltd.:

Name: Dr. Peng Telecom & Media Group Co., Ltd.  
Address: Creative Center, West High-tech Zone, Chengdu, China  
Ownership: 100%  
Citizenship: China  
Principal Business: Listed company in Shanghai stock exchange

Name: China Culture Silicon Valley Limited  
Address: Unit 1705-1706, 17/F, One Peking, 1 Peking Road, Tsim Sha Tsui, Kowloon, Hong Kong  
Ownership: 7%  
Citizenship: Hong Kong  
Principal Business: Holding company

China Culture Silicon Valley Limited is 100% owned by Mr. Wei, Junkang:

Name: Wei, Junkang  
Address: G/F, 19 Cumberland Road, Kowloon Tong, Kowloon, Hong Kong  
Citizenship: Hong Kong SAR of China  
Principal Business: Business Investment in Information Technology

PLDC does not have any interlocking directorates with foreign carriers.

**(2) Information Requested by 47 C.F.R. § 1.767(a)(8)(ii):**

PLDC certifies that it:

(A) is not a foreign carrier in any foreign country;

(B) does not own or control any cable landing stations in any foreign country; and

(C) is affiliated with only the following foreign carrier or entities owning or controlling a cable landing station in any foreign country.

- Urban Communications, Inc. – A Canadian based company providing facility based broadband Internet and telecommunications services in greater metropolitan Vancouver area.
- Dr Peng Telecom&Media Group Co., Ltd. – A China based company providing wide range of facility based Internet access and communications (non-voice) services. Services include but not limited to Internet Access, IPVPN, Data Center, Cloud solutions, and CDN services.

**(3) Information Requested by 47 C.F.R. § 1.767(a)(8)(iii):**

PLDC certifies to the following:

(A) it is not a foreign carrier in Hong Kong, Taiwan, or the Philippines, the three foreign destination markets in which the PLCN system will land;

(B) it does not control a foreign carrier in Hong Kong, Taiwan, or the Philippines;

(C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in Hong Kong, Taiwan, or the Philippines; and

(D) no grouping of two or more foreign carriers in Hong Kong, Taiwan, or the Philippines (or parties that control foreign carriers in Hong Kong, Taiwan, or the Philippines) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision of marketing or arrangements of the terms of acquisition, sale, lease, transfer, and use of capacity on the PLCN system in the United States.

**(4) Information Requested by 47 C.F.R. § 1.767(a)(8)(iv):**

Not applicable.

**(5) Information Requested by 47 C.F.R. § 63.18(o):**

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, PLDC is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

**INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)**

PLDC accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

**ELIGIBILITY FOR STREAMLINED PROCESSING UNDER 47 C.F.R. § 1.767(k)**

PLDC is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. PLDC is not a foreign carrier in Hong Kong, Taiwan, or the Philippines, and is not affiliated with a foreign carrier in any of those countries.

Further, PLDC is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). California, the only U.S. state in which the PLCN cable system will land,

does not list a cable landing license as a federal activity requiring a consistency certification under the CZMA.<sup>1</sup>

**Certification**

I am authorized to enter this certification on behalf of Pacific Light Data Communication Co., Limited.

All of the information contained in this application and Appendix D is true and correct to the best of my knowledge and belief.

By:

  
Tsang, Yu Hoi  
Administration Manager  
Unit 1705-1706, 17/F, One Peking,  
1 Peking Road, Tsim Sha Tsui, Kowloon, Hong  
Kong  
+852 2682 6369  
christsang@pldcglobal.com

**For and on behalf of Pacific Light Data  
Communication Co., Limited.**

Dated: 10 December 2017

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<sup>1</sup> See California's List of Federal Licenses and Permits Subject to Certification for Consistency, available at <https://www.coastal.ca.gov/fedcd/fedcdndx.html>.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following:

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
(via first class U.S. mail, postage prepaid)

U.S. Coordinator  
EB/CIP  
U.S. Department of State  
2201 C Street NW  
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David Krech  
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U.S. Department of Commerce  
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Stephanie Selmer  
December 27, 2017