

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

GCI COMMUNICATION CORP.,

Application for a License to Land and Operate
a Private Fiber-Optic Submarine Cable System,

THE TERRA-ALEUTIAN CABLE SYSTEM

File No. SCL-LIC-20171031-00024
SCL-AMD-2018-_____

**AMENDED AND RESTATED APPLICATION FOR CABLE LANDING LICENSE—
STREAMLINED PROCESSING REQUESTED**

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. § 1.767, GCI Communication Corp. (“GCICC,” FRN 0001568880), hereby amends and restates its application for a license to land and operate within the United States a private fiber-optic submarine cable network connecting communities in Southwest Alaska and the Aleutian Islands that will be known as the TERRA-Aleutian cable system.¹ Specifically, GCICC amends its application to update the route of TERRA-Aleutian, which will now connect Kodiak, Larsen Bay, Chignik, Perryville, Sand Point, King Cove, Cold Bay, False Pass, Akutan, Dutch Harbor, and False Pass.² As part of this amendment, GCICC also updates its indirect ownership information to reflect the Commission-approved transfer of control and reorganization by which GCI Liberty, Inc. (“GCI

¹ GCI Communication Corp., Application for a License to Land and Operate a Private Fiber-Optic Submarine Cable System Connecting Akutan, Dutch Harbor, False Pass, Levelock, and Port Heiden, Alaska, File No. SCL-LIC-20171031-00024 (filed Oct. 31, 2017) (“Original Application”).

² Three of the landings—Akutan, Dutch Harbor, and False Pass—remain unchanged from the Original Application. Instead of landing at Levelock and Port Heiden, however, TERRA-Aleutian will now land at other communities along a southern route.

Liberty”) became GCICC’s ultimate parent.³ GCICC had already notified the Commission of the updated ownership,⁴ but it includes the information in this amended and restated application for the Commission’s convenience. GCICC’s amendment of this application has been delayed by continuing uncertainties relating to rural healthcare funding, which is an important piece of the business case on which TERRA-Aleutian will depend if it is to be built.

TERRA is GCI’s next-generation hybrid fiber-optic and microwave network that provides symmetrical broadband service to Alaska’s remote and rural regions. The TERRA-Aleutian cable system will extend the TERRA network to remote Southwest Alaska and the Aleutian Islands.

GCICC will operate TERRA-Aleutian on a non-common-carrier basis, by providing bulk capacity to wholesale and enterprise customers on particularized terms and conditions pursuant to individualized negotiations. GCICC intends to commence commercial operation of TERRA-Aleutian in the first calendar quarter of 2020. GCICC therefore seeks timely grant of a cable landing license by the Commission no later than May 2019 in order to permit construction activities to proceed on schedule.

A grant of this application will advance the public interest. At present, most of the communities to be connected by TERRA-Aleutian—including Dutch Harbor, the largest U.S. fishing port by volume—rely solely on satellite links, which suffer from propagation delays and capacity constraints. TERRA-Aleutian will allow customers to use a state-of-the-art system and provide much-needed capacity and redundancy in Southwest Alaska and the Aleutian Islands.

³ Joint Application of General Communication, Inc. and GCI Liberty, Inc. for Consent to Transfer Control, DA 17-1096, WC Docket No. 17-114 (rel. Nov. 8, 2017).

⁴ Letter from Kent D. Bressie, Counsel to GCI Communication Corp., to Marlene H. Dortch, Secretary, Federal Communications Commission, at 1, File No. SCL-LIC-20171031-00024 (Nov. 21, 2017).

A. Applicant Name, Address, and Telephone Number⁵

GCI COMMUNICATION CORP.
2550 Denali Street
Suite 1000
Anchorage, Alaska 99503
+1 907 265 5600

B. Applicant Place of Incorporation⁶

GCICC is an Alaska corporation.

C. Applicant Contact Information⁷

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Counsel for GCI Communication Corp.

D. System Description⁸

TERRA-Aleutian will have a total length of 1456 kilometers with fifteen segments and twelve landings:

- Segment 1: Dutch Harbor to Akutan Branch Unit – 58.5 kilometers, 12 fiber pairs;

⁵ See 47 C.F.R. § 1.767(a)(1).

⁶ See *id.* § 1.767(a)(2).

⁷ See *id.* § 1.767(a)(3).

⁸ See *id.* § 1.767(a)(4).

- Segment 2: Akutan to Akutan Branch Unit – 27.3 kilometers, 12 fiber pairs;
- Segment 3: Akutan Branch Unit to False Pass Branch Unit – 212 kilometers, 12 fiber pairs;
- Segment 4: False Pass to False Pass Branch Unit – 44.2 kilometers, 12 fiber pairs
- Segment 5: False Pass Branch Unit to King Cove – 60.7 kilometers, 12 fiber pairs
- Segment 6: King Cove to Cold Bay – 43.1 kilometers, 6 fiber pairs
- Segment 7: King Cove to Sand Point – 175.9 kilometers, 6 fiber pairs
- Segment 8: Sand Point to Perryville Branch Unit – 118.4 kilometers, 9 fiber pairs;
- Segment 9: Perryville to Perryville Branch Unit – 45.9 kilometers, 6 fiber pairs;
- Segment 10: Perryville Branch Unit to Chignik Bay – 135.5 kilometers, 9 fiber pairs;
- Segment 11: Chignik Bay to Larsen Bay Branch Unit – 326.8 kilometers, 6 fiber pairs;
- Segment 12: Larsen Bay to Larsen Bay Branch Unit – 37.2 kilometers, 12 fiber pairs;
- Segment 13: Larsen Bay Branch Unit to Kodiak – 135.7 kilometers; 6 fiber pairs;
- Segment 14: Chignik Bay to Chignik Lagoon – 16.5 kilometers; 6 fiber pairs; and
- Segment 15: Chignik Lagoon to Chignik Lake – 18 kilometers; 6 fiber pairs.

TERRA-Aleutian will have a current design capacity of 800 Gbps per fiber.

GCICC expects that TERRA-Aleutian will enter into commercial service in the first calendar quarter of 2020. In Appendix 1, the Applicant provides a route map for the system.

E. Landing Points⁹

The Applicant provides specific landing point information (including geographic coordinates for beach manholes and cable landing stations) in the following appendices:

- Appendix 2: Akutan
- Appendix 3: Dutch Harbor
- Appendix 4: False Pass
- Appendix 5: King Cove
- Appendix 6: Cold Bay
- Appendix 7: Sand Point
- Appendix 8: Perryville
- Appendix 9: Chignik Bay
- Appendix 10: Chignik Lagoon
- Appendix 11: Chignik Lake
- Appendix 12: Larsen Bay
- Appendix 13: Kodiak

F. Regulatory Classification¹⁰

GCICC will operate TERRA-Aleutian on a non-common-carrier basis. Non-common-carrier classification of the proposed system is consistent with established Commission policy and precedent and with judicial precedent, and it will advance the public interest.

First, the Commission should not subject TERRA-Aleutian to common-carrier regulation because TERRA-Aleutian will not operate on a common-carrier basis as defined in *NARUC I*.¹¹

⁹ See *id.* § 1.767(a)(5).

¹⁰ See *id.* § 1.767(a)(6).

The courts have stated that “the primary *sine qua non* of common carrier status is a quasi-public character, which arises out of the undertaking ‘to carry for all people indifferently.’”¹² On TERRA-Aleutian, however, GCICC will not sell capacity indifferently to the user public. Instead, GCICC will: (a) use TERRA-Aleutian capacity as an input for other services offered to retail, enterprise, and government customers in Alaska, and (b) sell bulk capacity to particular carrier, enterprise, and government customers pursuant to individually-negotiated infeasible rights of use (“IRUs”) and capacity leases, the terms of which will vary depending on the characteristics and needs of the particular capacity purchaser. The Commission has consistently found that such offerings do not make an applicant a common carrier.¹³

Second, the Commission should not subject TERRA-Aleutian to common-carrier regulation because there is no legal compulsion or other public-interest reason for GCICC to operate TERRA-Aleutian in such a manner. Under the *NARUC I* test, the Commission must

¹¹ See *Nat’l Ass’n of Regulatory Utility Comm’rs v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) (“*NARUC I*”) (stating that the court must inquire “whether there are reasons implicit in the nature of [the] operations to expect an indifferent holding out to the eligible user public”), *cert. denied*, 425 U.S. 992 (1976); see also *Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999) (affirming FCC’s use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

¹² *Nat’l Ass’n of Regulatory Utility Comm’rs v. FCC*, 533 F.2d 601, 608 (D.C. Cir. 1976) (quoting *Semon v. Royal Indemnity Co.*, 279 F.2d 737, 739 (5th Cir. 1960)).

¹³ See *AT&T Corp. et al.*, Cable Landing License, 13 FCC Rcd. 16,232, 16,238 (Int’l Bur. 1998) (finding that individualized decisions concerning the sale or lease of capacity on the China-U.S. Cable Network would not constitute the effective provision of a service to the public so as to make the applicant a common carrier); *AT&T Submarine Systems, Inc.*, Cable Landing License, 11 FCC Rcd. 14,885, 14,904 ¶ 64 (Int’l Bur. 1996) (“*St. Thomas-St. Croix Cable Order*”) (finding that an “offer of access, nondiscriminatory terms and conditions and market pricing of IRUs does not rise to the level of an ‘indiscriminate’ offering” so as to constitute common carriage), *aff’d* 13 FCC Rcd. 21,585 (1998), *aff’d sub nom. Virgin Islands Telephone Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

determine whether the public interest requires common-carrier operation of the cable system.¹⁴

Traditionally, the Commission has “focused on whether the applicant has sufficient market power to warrant common carrier regulation,”¹⁵ although the Commission “[is] not limited to that reasoning” and has looked more broadly to determine whether common-carrier licensing is in the public interest.¹⁶ TERRA-Aleutian poses no such competitive or other public-interest concerns.

On routes served by TERRA-Aleutian, GCICC will compete vigorously with existing providers’ facilities, including existing satellite service providers: Alaska Communications Systems Group, Inc. (“ACS”), TelAlaska, Bristol Bay Telecom, AT&T, DSL, and HughesNet.¹⁷ The Commission has previously found the existence of intermodal competition sufficient to justify non-common carrier status for a submarine cable system¹⁸ and that facilities need not be

¹⁴ *NARUC I*, 525 F.2d at 642 (stating that the court must inquire “whether there will be any legal compulsion . . . to serve [the public] indifferently”).

¹⁵ *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,893 ¶ 30.

¹⁶ *See AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13,066, 13,080 ¶ 39 (1999) (stating that “[a]lthough this public interest analysis has generally focused on the availability of alternative facilities, we are not limited to that reasoning”); *Australia-Japan Cable (Guam) Limited*, Cable Landing License, 15 FCC Rcd. 24,057, 24,062 ¶ 13 (Int’l Bur. 2000) (stating that “[t]his public interest analysis generally has focused on whether an applicant will be able to exercise market power because of the lack of alternative facilities, although the Commission has not limited itself to that reasoning”); *Telefonica SAM USA, Inc. et al.*, Cable Landing License, 15 FCC Rcd. 14,915, 14,920 ¶ 11 (Int’l Bur. 2000) (stating that “[t]his public interest analysis has focused on the availability of alternative facilities, although the Commission has stated it is not limited to that reasoning”).

¹⁷ GCI will also continue operation of its satellite earth station facilities in these local markets.

¹⁸ *See, e.g., General Communication, Inc.*, Cable Landing License, 12 FCC Rcd. 18,292, 18,297 ¶ 16 (Int’l Bur. 1997) (noting that existing terrestrial microwave and satellite facilities provided competition on the proposed route of GCI’s Alaska United East system), *aff’d*, Order on Review, 16 FCC Rcd. 4314 (2001) (“*AU-East Order on Review*”).

identical in order to offer pro-competitive benefits.¹⁹ More broadly, GCICC and its affiliates will continue to compete vigorously with the incumbent, ACS, in the intra-Alaska and Alaska-Lower 48 markets. ACS’s Alaska Northstar and AKORN systems connect Alaska with Oregon.

G. Cable Ownership Information²⁰

GCICC will own and operate the whole of TERRA-Aleutian, including the wet links and cable landing facilities for all twelve landings in Alaska.

H. Certifications Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates²¹

By the signature below, GCICC certifies that it has the following 10-percent-or-greater direct or indirect shareholders (reflecting the consummation of the GCI-Liberty transaction—to which the Commission has previously consented²²—on March 8, 2018):

GCI Holdings, Inc. (“GCI Holdings”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Place of Organization: Delaware

Principal Business: telecommunications

Relationship: GCI Holdings holds a 100-percent voting and equity interest in GCICC’s shares.

Ventures Holdco, LLC (“Ventures Holdco”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Citizenship: Delaware

Principal Business: holding company

Relationship: Ventures Holdco holds a 100-percent voting and equity interest in GCI Holdings.

¹⁹ *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,898 ¶ 44 (stating that “requiring current identical substitute common carrier facilities before non-common carrier facilities will be authorized would serve as a disincentive for entities to take risks and expend capital to expand and upgrade facilities”).

²⁰ *See* 47 C.F.R. § 1.767(a)(7).

²¹ *See id.* §§ 1.767(a)(8)(i), 63.18(h).

²² *Joint Application of General Communication, Inc. and GCI Liberty, Inc. for Consent to Transfer Control*, Memorandum Opinion and Order, 32 9349 (Wireline, Int’l, Media, and Wireless Burs. 2017).

GCI, LLC (“GCI”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Citizenship: Alaska

Principal Business: holding company

Relationship: GCI holds a 100-percent voting and equity interest in Ventures Holdco.

GCI Liberty, Inc. (“GCI Liberty”)

Address: 12300 Liberty Boulevard, Englewood, Colorado 80112

Citizenship: Delaware

Principal Business: holding company

Relationship: GCI Liberty holds a 100-percent voting and equity interest in GCI.

Dr. John C. Malone

Address: c/o GCI Liberty, Inc., 12300 Liberty Boulevard, Englewood, Colorado 80112

Citizenship: USA

Principal Business: telecommunications and investments

Relationship: Dr. Malone holds an approximate 27-percent voting interest and an approximate 4-percent equity interest in GCI Liberty.

GCI Liberty’s shares trade publicly on the NASDAQ exchange under the symbols GLIBA and GLIBP and are widely held. GCI Liberty has no ten-percent-or-greater director or interest voting- or equity-interest holders other than Dr. Malone, noted above. GCI Liberty does not have any interlocking directorates with a foreign carrier.

I. Certification Regarding the Anti-Drug Abuse Act of 1988²³

By its signature below, GCICC certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.²⁴

²³ See 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(o).

²⁴ 21 U.S.C. § 862(a). Anti-Drug Abuse Act of 1988, Pub. L. No. 100-690, title V, Section 5301, 102 Stat. 4310 (1988), which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1), 104 Stat. 4827 (1990), and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

J. Certification Regarding Foreign Carrier Status and Foreign Affiliations²⁵

GCICC amends this section to reflect the consummation of the GCI-Liberty transaction.

By the signature below, GCICC certifies that (1) it is not a foreign carrier and (2) it is affiliated with foreign carriers (including foreign carriers that control a cable landing station in a foreign country) as listed in Table 1 below.

**TABLE 1:
Affiliated Foreign Carriers and Cable Landing Station Interests**

Country	Foreign Carrier
Anguilla	Cable and Wireless (Anguilla) Limited
Antigua & Barbuda	Cable & Wireless Antigua & Barbuda Limited
	Kelcom International (Antigua & Barbuda) Ltd.
Austria	UPC Austria GmbH
Barbados	Cable & Wireless (Barbados) Limited
	Columbus Telecommunications (Barbados) Limited
	Karib Cable Inc.
Bahamas	The Bahamas Telecommunications Company Limited
	Columbus Communications Limited
Belgium	Telenet Group Holding N.V.
Belize	ARCOS-1 USA, Inc.
Bonaire	Columbus Networks Bonaire, N.V.
British Virgin Islands	Cable and Wireless (British Virgin Islands) Limited
Cayman Islands	Cable and Wireless (Cayman Islands) Limited
Chile	VTR GlobalCom SpA
Colombia	Columbus Networks de Colombia, Ltda.
	Columbus Networks Zona Franca Ltda.
	Lazus de Colombia S.A.S.
Costa Rica	Columbus Networks de Costa Rica S.R.L.
	Promitel Costa Rica S.A.
Curaçao	Columbus Communications Curaçao N.V.
	Columbus Networks Curaçao, N.V.
	Columbus Networks Netherlands Antilles, N.V.
Czech Republic	UPC Ceska Republica Sro
Dominica	Cable & Wireless Dominica Limited
Dominican Republic	Columbus Networks Dominicana, S.A.
	CWC Cable & Wireless Communications Dominican Republic SA
El Salvador	Columbus Networks Centroamerica, S. de R.L.

²⁵ See 47 C.F.R. § 1.767(a)(8)(ii).

Country	Foreign Carrier
	Columbus Networks El Salvador S.A.
Germany	Unitymedia GmbH
Grenada	Cable & Wireless Grenada Limited
	Columbus Communications (Grenada) Limited
Guatemala	Columbus Networks de Guatemala Limitada
Honduras	Columbus Networks de Honduras, S. de R.L.
Hungary	UPC Magyarország Kft
Ireland	Virgin Media Ireland Ltd
Jamaica	Cable & Wireless Jamaica Limited
	Columbus Communications Jamaica Limited
	Columbus Networks Jamaica Limited
Mexico	Columbus Networks de Mexico S. de R.L. de C.V.
Montserrat	Cable and Wireless (West Indies) Limited
Netherlands	VodafoneZiggo Group Holding BV
Nicaragua	Columbus Networks Nicaragua y Compañía Limitada
Panama	Cable & Wireless Panama S.A.
	CWC WS Holdings Panama S.A.
	Columbus Networks de Panama S.R.L.
	Promitel Panama S.A.
Peru	Lazus Peru S.A.C.
Poland	UPC Polska Sp. z.o.o.
Romania	UPC Romania Srl
St. Kitts & Nevis	Cable & Wireless St. Kitts & Nevis Limited
St. Lucia	Columbus Communications (St. Lucia) Limited
	Tele (St. Lucia) Inc.
	Cable & Wireless (St. Lucia) Limited
St. Vincent & the Grenadines	Cable & Wireless St. Vincent and the Grenadines Limited
	Columbus Communications St. Vincent and the Grenadines Limited
Seychelles	Cable & Wireless (Seychelles) Limited
Slovak Republic	UPC Broadband Slovakia sro
Switzerland	UPC Schweiz GmbH
Trinidad and Tobago	Columbus Communications Trinidad Limited
	Columbus Networks International (Trinidad) Limited
	Telecommunications Services of Trinidad and Tobago Limited
Turks & Caicos Islands	Columbus Networks, Limited
	Cable and Wireless (TCI) Limited
United Kingdom (England & Wales)	Virgin Media Limited
Venezuela	Columbus Networks de Venezuela, S.A.

K. Certification Regarding Destination Countries²⁶

By the signature below, GCICC certifies to the following: (1) it is not a foreign carrier in any foreign country, much less a foreign destination market for TERRA-Aleutian (of which there is none, as it is a U.S. domestic system); (2) it does not control a foreign carrier in any foreign country where TERRA-Aleutian will land (of which there is none); (3) no entity that owns more than 25 percent of GCICC, or that controls GCICC, controls a foreign carrier in any foreign country where TERRA-Aleutian will land (of which there is none); and (4) no grouping of two or more foreign carriers (or parties that control foreign carriers in any of the foreign countries where TERRA-Aleutian will land, as there are no such countries) owns, in aggregate, more than 25 percent of GCICC and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity TERRA-Aleutian in the United States.

L. Certification Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets²⁷

No response is required, as no country was identified in response to 47 C.F.R.

§ 1.767(a)(8)(iii).

M. Certifications Regarding Routine Conditions²⁸

By its signature below, GCICC certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

²⁶ See *id.* § 1.767(a)(8)(iii).

²⁷ See *id.* § 1.767(a)(8)(iv).

²⁸ See *id.* § 1.767(a)(9).

N. Streamlining—Market Power²⁹

GCICC requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). GCICC is not, and is not affiliated with, a foreign carrier owning or controlling a cable landing station in any foreign country in which TERRA-Aleutian will land (of which there are none, as TERRA-Aleutian is a U.S. domestic system). This application raises no other foreign ownership, competition, or public interest concerns that would merit consideration outside the Commission's streamlined review process.

O. Streamlining—CZMA³⁰

By its signature below, GCICC certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Alaska—the only state in which TERRA-Aleutian will land—does not list a cable landing license as a federal activity requiring a consistency certification. To the contrary, Alaska withdrew from the National Coastal Zone Management Program effective July 1, 2011.³¹

P. Certification Regarding Service to Executive Branch Agencies³²

The Applicant has sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense. The Applicant's counsel has certified such service in the certificate of service attached to this application.

²⁹ See *id.* § 1.767(j), (k).

³⁰ See *id.*

³¹ See National Oceanic and Atmospheric Administration, Coastal Zone Management Programs, <https://coast.noaa.gov/czm/mystate/>.

³² See 47 C.F.R. § 1.767(j).

CONCLUSION

For the foregoing reasons, the Commission should expeditiously grant this cable landing license application for the TERRA-Aleutian cable system pursuant to streamlined processing.

Respectfully submitted,

/x/ Christopher Nierman

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August 1, 2018

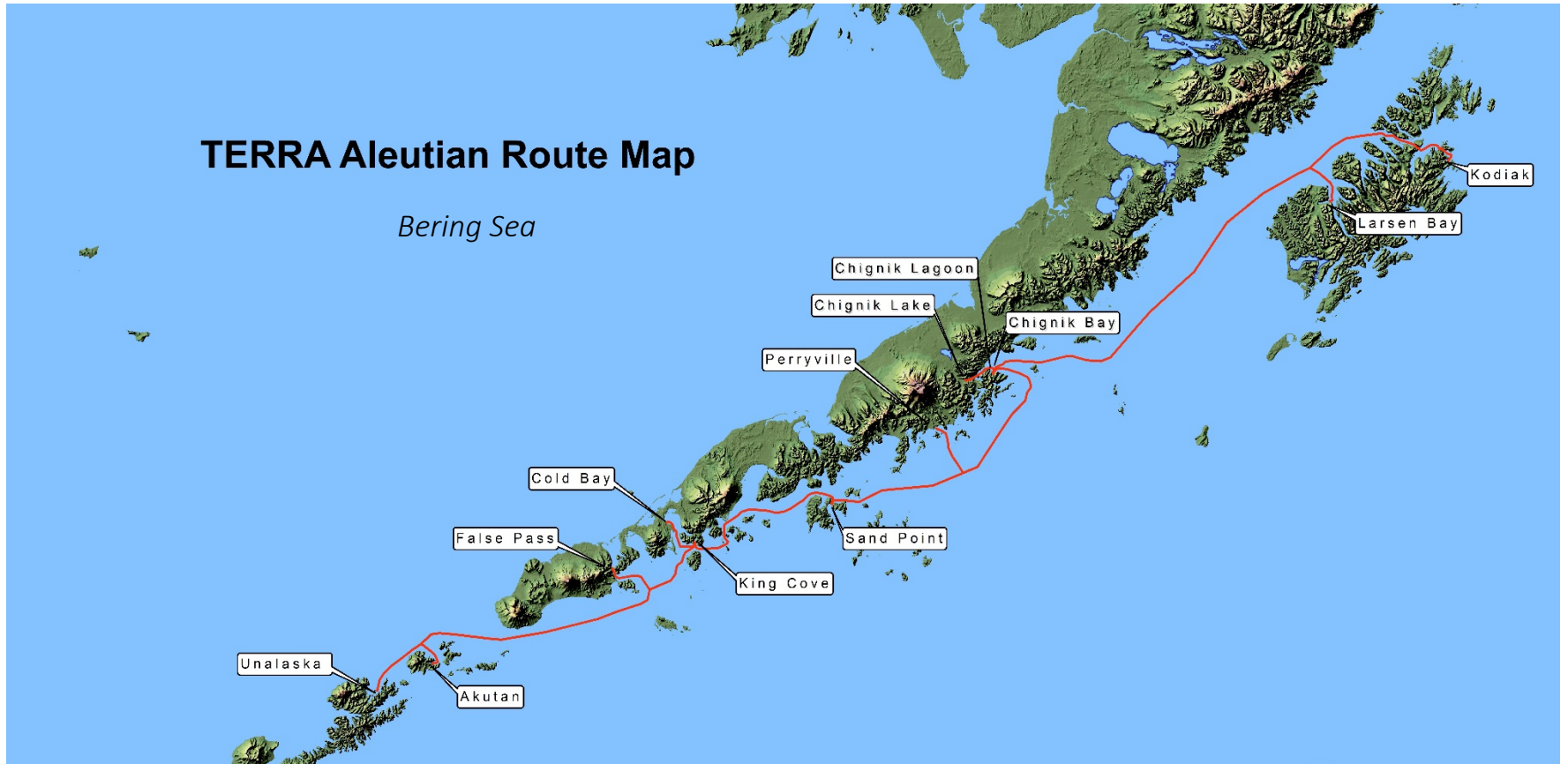
Attachments

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APPENDIX 1:

TERRA-ALEUTIAN ROUTE MAP



**APPENDIX 2:
AKUTAN LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 54° 07' 58.81"N 165° 46' 33.79"W

CLS/equipment shelter geographic coordinates: 54° 08' 0.85"N 165° 46' 36.27"W



**APPENDIX 3:
DUTCH HARBOR LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 53° 54' 54.58"N 166° 30' 10.91"W

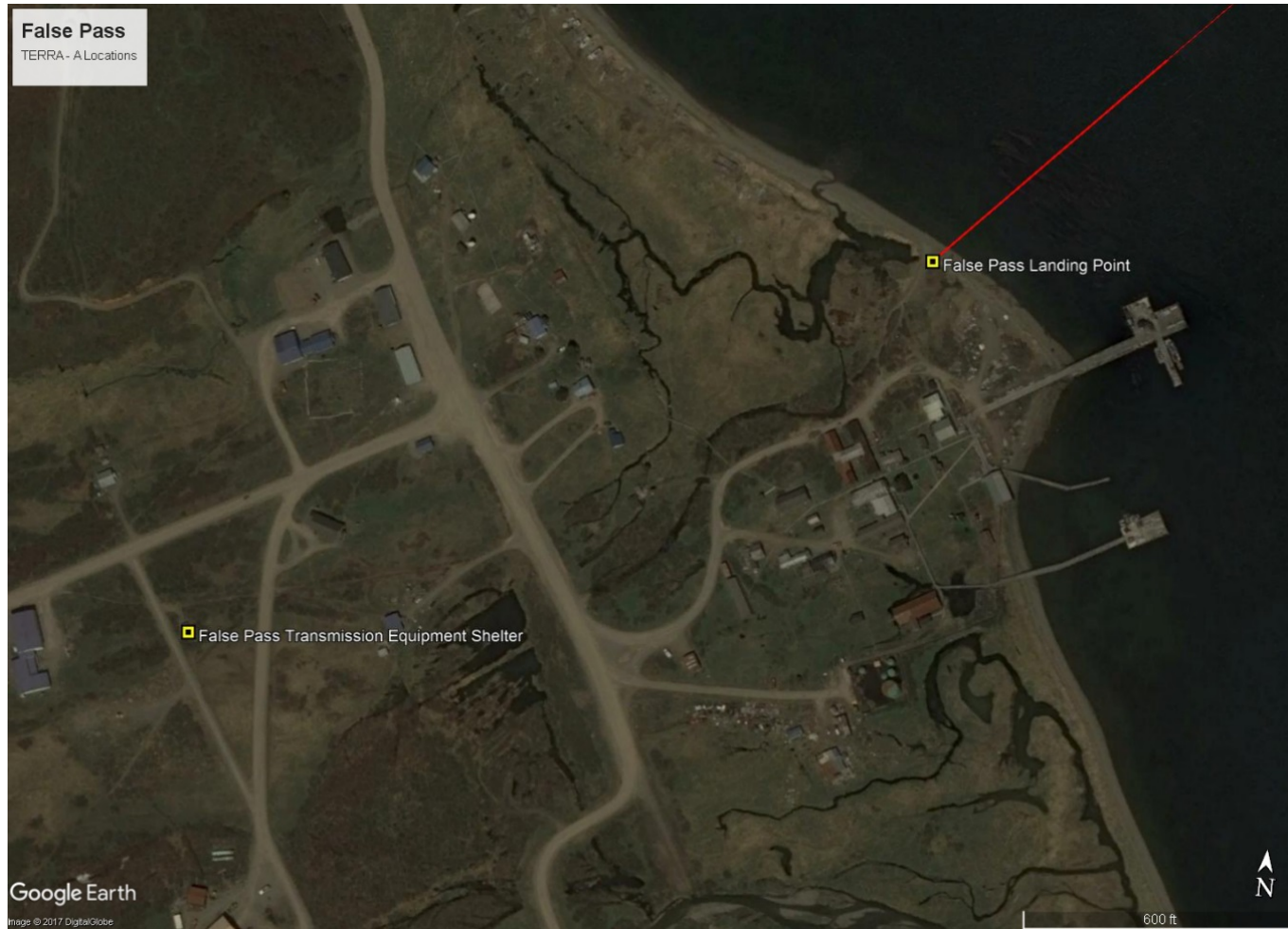
CLS/equipment shelter geographic coordinates: 53° 53' 51.46"N 166° 43' 20.11"W



**APPENDIX 4:
FALSE PASS LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 54° 51' 21.42"N 163° 24' 33.89"W

CLS/equipment shelter geographic coordinates: 54° 51' 11.88"N 163° 25' 0.19"W



**APPENDIX 5:
KING COVE LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 55° 3' 33.41"N 162° 18' 49.03"W

CLS/equipment shelter geographic coordinates: 55° 3' 39.25"N 162° 18' 52.03"W



**APPENDIX 6:
COLD BAY LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 55° 11' 44.98"N 162° 41' 51.68"W

CLS/equipment shelter geographic coordinates: 55° 12' 12.19"N 162° 42' 43.53"W



**APPENDIX 7:
SAND POINT LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 55° 20' 35.17"N 160° 30' 0.17"W

CLS/equipment shelter geographic coordinates: 55° 20' 33.41"N 160° 29' 3.46"W



**APPENDIX 8:
PERRYVILLE LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 55° 54' 33.81"N 159° 8' 39.40"W

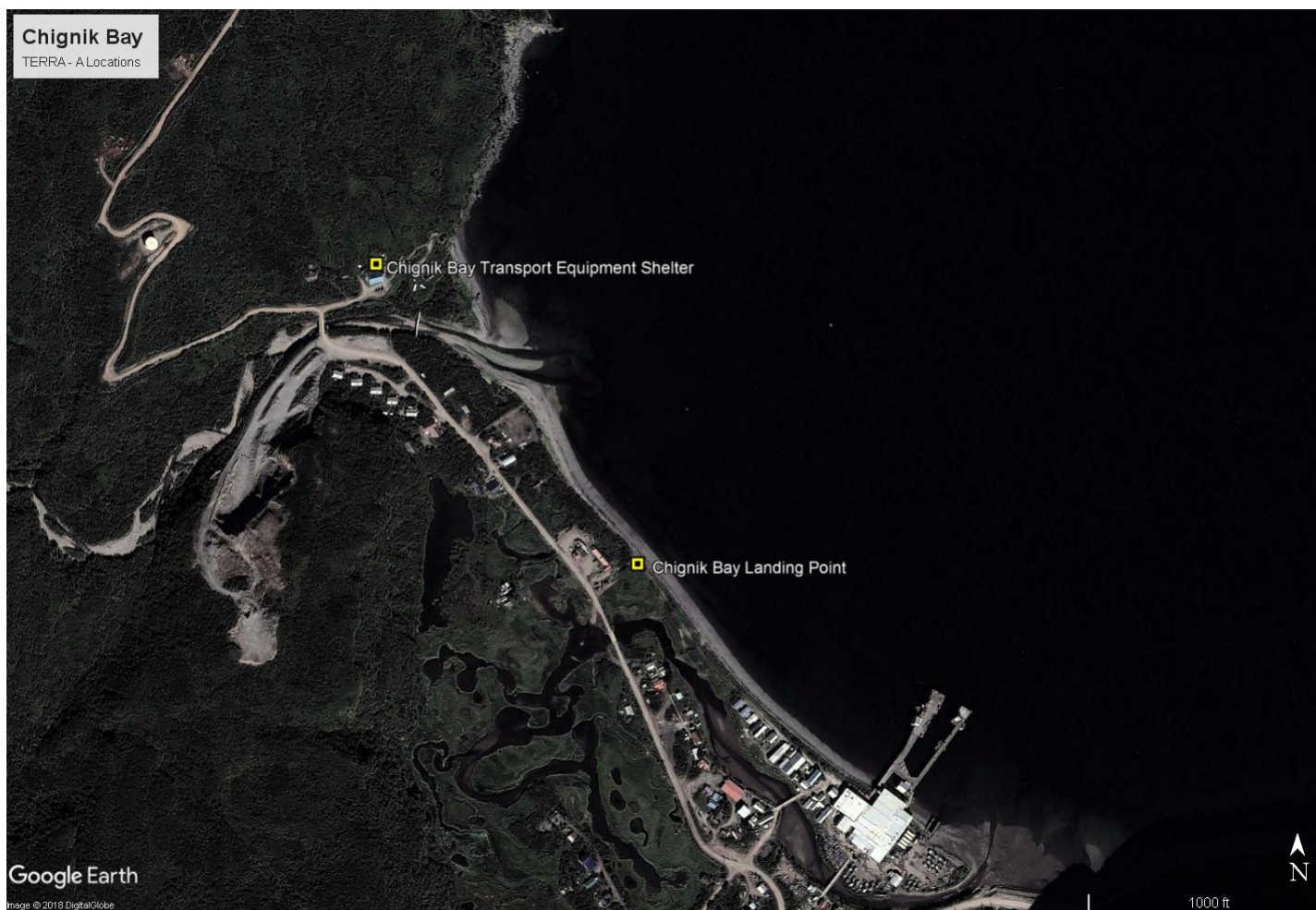
CLS/equipment shelter geographic coordinates: 55° 54' 37.56"N 159° 8' 40.70"W



**APPENDIX 9:
CHIGNIK BAY LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 56° 17' 52.12"N 158° 24' 30.82"W

CLS/equipment shelter geographic coordinates: 56° 18' 5.16"N 158° 24' 51.21"W



**APPENDIX 10:
CHIGNIK LAGOON LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 56° 18' 42.12"N 158° 32' 42.12"W

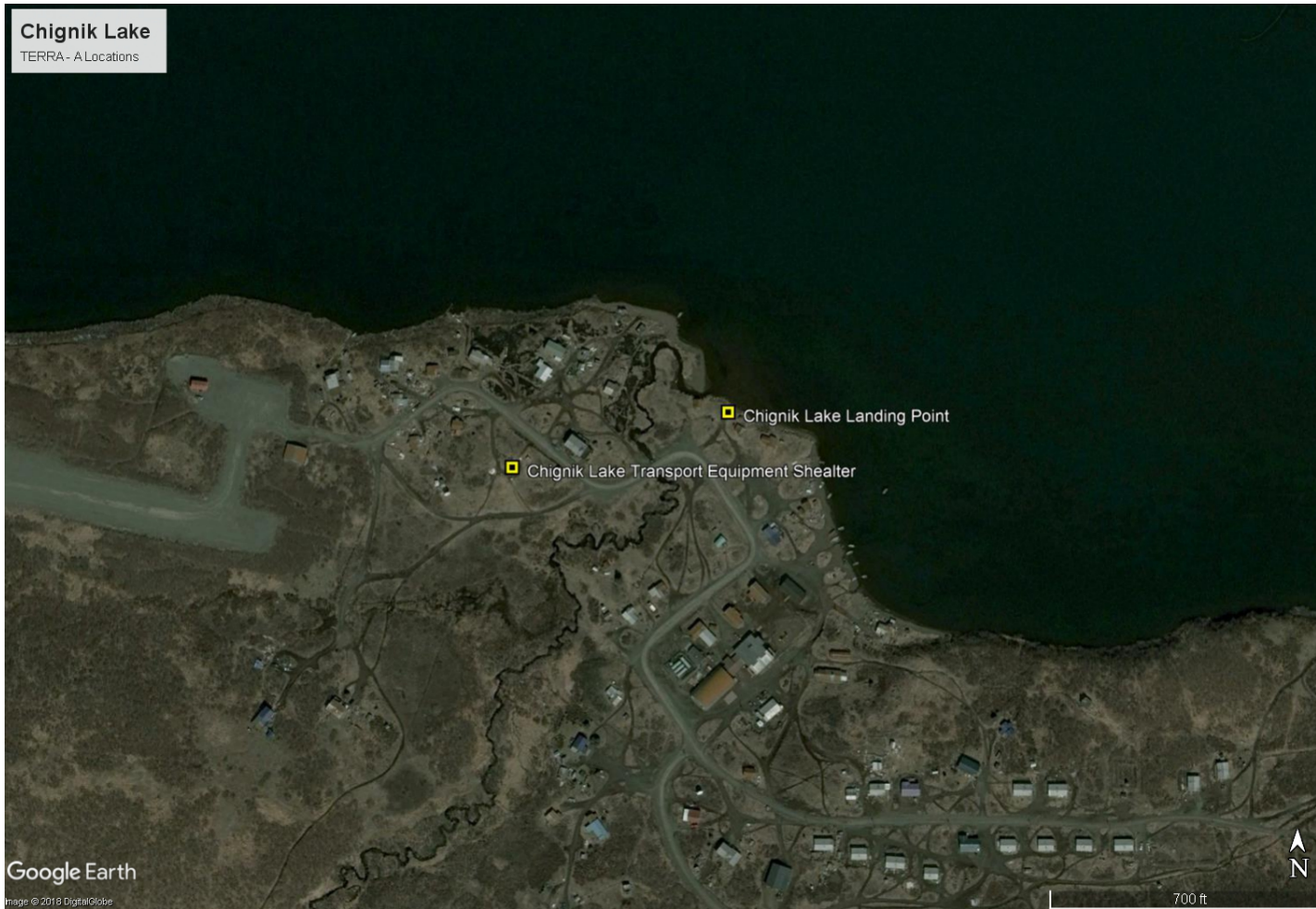
CLS/equipment shelter geographic coordinates: 56° 18' 38.99"N 158° 32' 11.93"W



**APPENDIX 11:
CHIGNIK LAKE LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 56° 15' 19.54"N 158° 45' 52.13"W

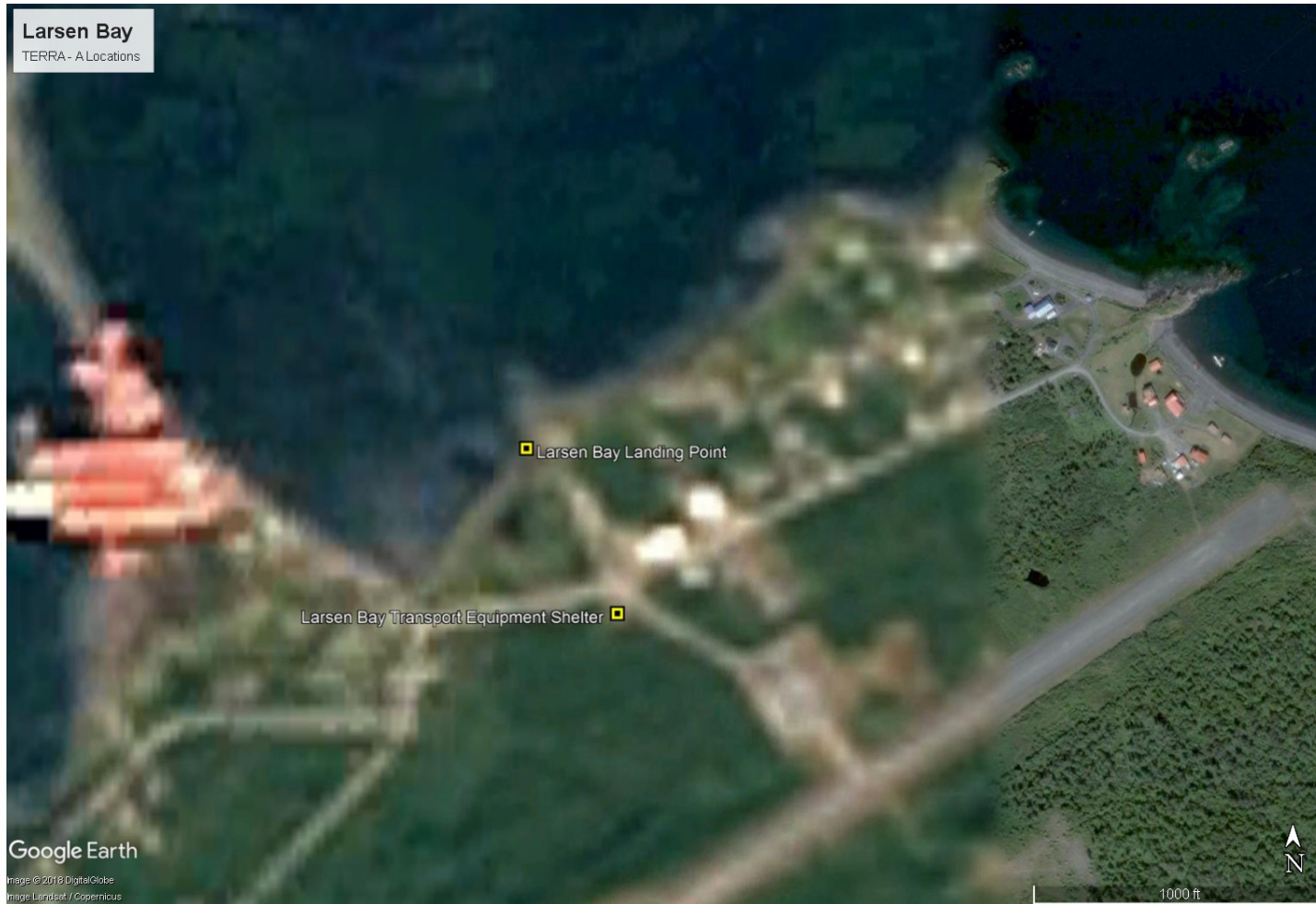
CLS/equipment shelter geographic coordinates: 56° 15' 18.17"N 158° 34' 1.68"W



**APPENDIX 12:
LARSEN BAY LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 57° 32' 17.07"N 153° 59' 1.45"W

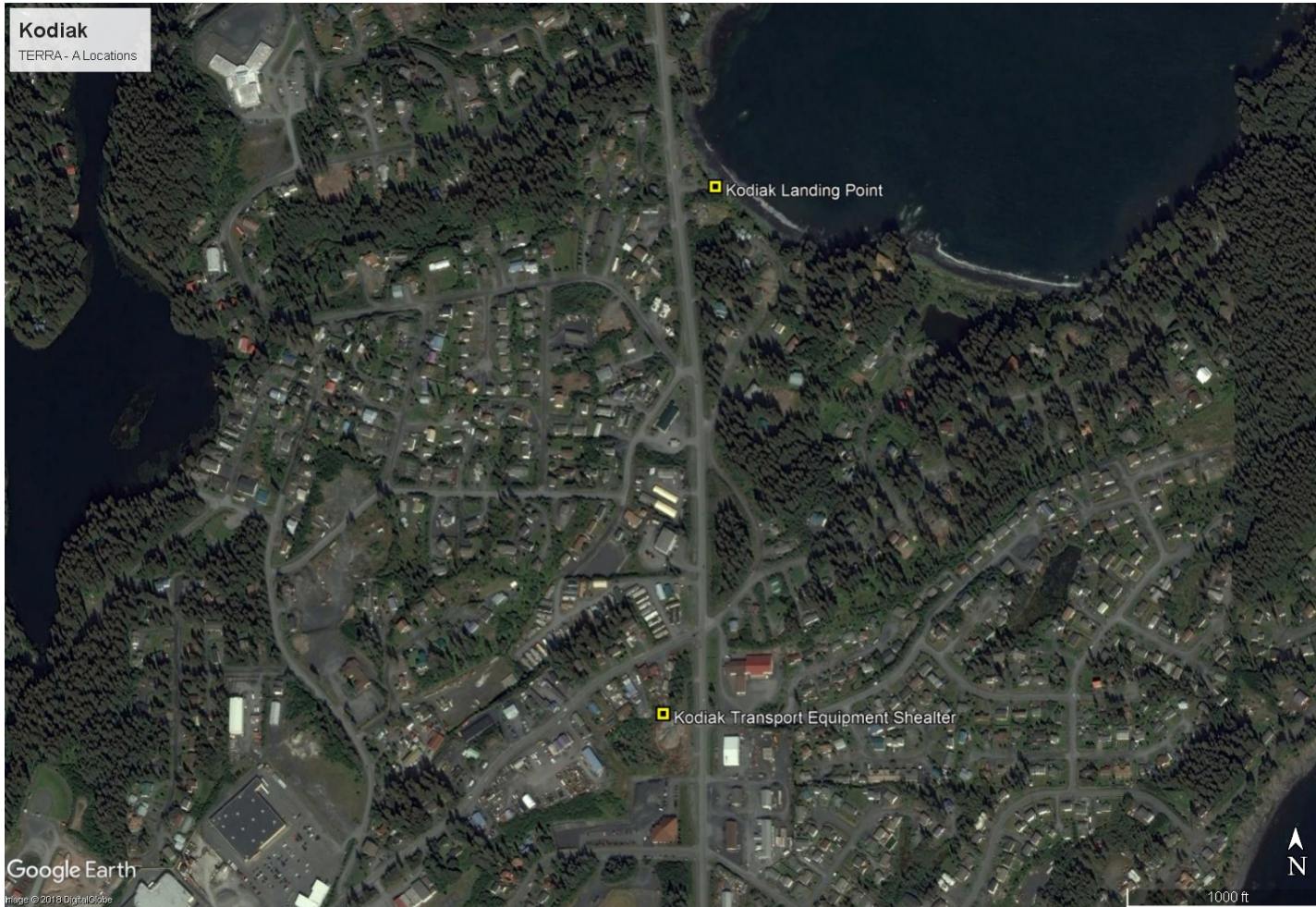
CLS/equipment shelter geographic coordinates: 57° 32' 11.15"N 153° 58' 55.30"W



**APPENDIX 13:
KODIAK LANDING POINT INFORMATION**

Beach manhole geographic coordinates: 57° 49' 12.78"N 152° 21' 13.90"W

CLS/equipment shelter geographic coordinates: 57° 48' 47.90"N 152° 21' 18.62"W



CERTIFICATE OF SERVICE

I, Kent Bressie, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing application for a cable landing license for the TERRA-Aleutian cable system, by hand delivery or electronic mail this 1st day of August, 2018, to the following:

Robert L. Strayer
Deputy Assistant Secretary of State for Cyber and
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Bureau of Economic and Business Affairs
U.S. DEPARTMENT OF STATE
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Kent Bressie