

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

TELXIUS CABLE USA INC. (AS LEAD APPLICANT),
TELXIUS CABLE PUERTO RICO, INC.
TELXIUS CABLE AMÉRICA, S.A.,
ANTIGUA PUBLIC UTILITIES AUTHORITY,
FRANCE TELECOM LONG DISTANCE USA, LLC,
D/B/A ORANGE CARRIERS USA, AND
SERVICIO DI TELECOMUNICACION DI ARUBA
(SETAR) N.V.,

Application for a License to Land and Operate a
Private Fiber-Optic Submarine Cable System
Connecting the United States, Martinique, Antigua
and Barbuda, Saint-Barthélemy, Aruba, Curaçao,
and Bonaire

THE CELIA SYSTEM

ICFS File No. SCL-LIC-2025-_____

APPLICATION FOR CABLE LANDING LICENSE

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. § 1.767, Telxius Cable USA, Inc. (“Telxius Cable USA”), Telxius Cable Puerto Rico, Inc. (“Telxius Cable Puerto Rico”), Telxius Cable América, S.A., (“Telxius Cable América”), Antigua Public Utilities Authority (“APUA”), France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA (“OCUSA”), and Servicio di Telecomunicacion di Aruba (SETAR) N.V. (“SETAR”) (collectively, the “Applicants”) hereby apply for a license to land and operate within the United States a private fiber-optic submarine cable network connecting: Boca Raton, Florida; Le Lamentin, Martinique – France (“Martinique”); Morris Bay, Antigua and Barbuda; Saint Jean Bay, Saint-Barthélemy; Baby Beach, Aruba; Willemstad, Curaçao; Kralendijk, Bonaire; and a stubbed branching unit on the BRUSA submarine cable system previously and separately

licensed by the Commission. The submarine cable system will be known as the CELIA system. The Applicants will operate the CELIA system on a non-common-carrier basis by using CELIA capacity as an input for services offered by their affiliates and/or by providing bulk capacity, fiber pair usage rights, or spectrum to wholesale and enterprise customers on particularized terms and conditions pursuant to individualized negotiations. The existence of robust competition on the U.S.-Martinique, U.S.-Antigua and Barbuda, U.S.-Saint-Barthélemy, U.S.-Aruba, U.S.-Curaçao, and U.S.-Bonaire routes obviates any need for common-carrier regulation on public-interest grounds.

The Applicants intend to commence commercial operation of the CELIA system by the fourth calendar quarter of 2027. They therefore seek a timely grant of a cable landing license by the Commission no later than December 2026 to permit construction activities to proceed on schedule.

An expeditious grant of this application will significantly advance the public interest. The CELIA system will provide significant new and competitive connectivity on routes where capacity demand continues to increase substantially each year and provide replacement capacity for systems nearing retirement. It will further enhance the diversity and resilience of connectivity between the mainland United States and each of Puerto Rico, Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, and Bonaire.

I. Information Required by 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k)

The Applicants provide company-specific disclosures and certifications for 47 C.F.R. § 1.767(a)(1)-(a)(3), (a)(8), (a)(9), (j), and (k) in the following appendices:

- **Appendix A:** Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América

- **Appendix B:** APUA
- **Appendix C:** OCUSA
- **Appendix D:** SETAR

II. System Description¹

The CELIA system will consist of 15 segments:

- **Segment 1.** This segment will connect Le Lamentin, Martinique with Branching Unit ATG off the coast of Antigua. It will have a total length of 327.48 kilometers and consist of one fiber pair.
- **Segment 2.** This segment will connect Branching Unit ATG with the beach manhole in Morris Bay, Antigua. This Segment 2 will have a total length of 25.01 kilometers and consist of two fiber pairs. The Segment 2 fiber pairs will connect within a nearby equipment hut housing a protection switch between two diversely-routed terrestrial backhaul connections, which will terminate at APUA's cable landing station ("CLS") located in St. John's. Each of these redundant backhaul routes is approximately 20 kilometers long. There will not be any CELIA power feed equipment located in Antigua. The submarine line terminating equipment for APUA will be located in the St. John's CLS.
- **Segment 3.** This segment will connect Branching Unit ATG with Branching Unit CSB off the coast of Saint-Barthélemy. It will have a total length of 138.75 kilometers and consist of three fiber pairs.

¹ 47 C.F.R § 1.767(a)(4).

- **Segment 4:** This segment will connect Branching Unit CSB with a landing point in Saint Jean Bay, Saint-Barthélemy. It will have a total length of 37.98 kilometers and consist of three fiber pairs.
- **Segment 5:** This segment will connect Branching Unit CSB with Branching Unit EUS off the coast of Sint Eustatius, the Netherlands. It will have a total length of 17.60 kilometers and consist of four fiber pairs.
- **Segment 6:** This segment will connect Branching Unit EUS with a cable stub pointing in the direction of Sint Eustatius. It will have a total length of 3.80 kilometers and consist of three fiber pairs. It will not connect Sint Eustatius at this time, and the Applicants would separately seek Commission consent for any such connection in the event they were to develop it in the future.
- **Segment 7:** This segment will connect Branching Unit EUS with Branching Unit SJU. It will have a total length of 345.44 kilometers and consist of three fiber pairs.
- **Segment 8.** This segment will connect Branching Unit SJU with a cable stub of the BRUSA system, which was previously and separately licensed by the Commission.² It will have a total length of 32.14 kilometers and consist of four fiber pairs. The four fiber pairs of Segment 4 will connect to submarine line terminating equipment of the CELIA system (to be owned and operated by Telxius Cable Puerto Rico in its existing CLSs in San Juan, where the BRUSA system lands) via a branching unit and four fiber pairs of the cable stub of the BRUSA system.

² *Actions Taken Under Cable Landing License Act*, Public Notice, 32 FCC Rcd. 6524 (Int'l Bur. 2017) ("*BRUSA Cable Landing License*"); ICFS File No. SCL-LIC-20160330-00011. The joint cable landing licensees for the BRUSA system are Telxius Cable USA, Telxius Cable América, and Telxius Cable Puerto Rico.

- **Segment 9.** This segment will connect Branching Unit SJU with Branching Unit BAB. It will have a total length of 293.61 kilometers and consist of seven fiber pairs.
- **Segment 10.** This segment will connect Branching Unit BAB with Branching Unit AUA off the coast of Aruba. It will have a total length of 787.83 kilometers and consist of three fiber pairs.
- **Segment 11.** This segment will connect Branching Unit BAB with Boca Raton, Florida. It will have a total length of 1803.26 kilometers and consist of eight fiber pairs.
- **Segment 12:** This segment will connect Baby Beach, Aruba with Branching Unit AUA. It will have a total length of 21.71 kilometers and consist of 13 fiber pairs.
- **Segment 13:** This segment will connect Branching Unit AUA with Branching Unit CUR off the coast of Curaçao. It will have a total length of 100.28 kilometers and consist of 10 fiber pairs.
- **Segment 14:** This segment will connect Branching Unit CUR with Willemstad, Curaçao. It will have a total length of 22.08 kilometers and consist of 12 fiber pairs.
- **Segment 15:** This segment will connect Branching Unit CUR with Kralendijk, Bonaire. It will have a total length of 96.12 kilometers and consist of eight fiber pairs.

The system's 26 fiber pairs will have total design capacities (using current technologies) as follows:

- Boca Raton to Le Lamentin, Martinique (one fiber pair): up to 22.1 Tbps³
- Boca Raton to Morris Bay, Antigua (two fiber pairs): 23.2 Tbps per fiber pair
- Boca Raton to Saint Barthélemy (three fiber pairs): up to 2.2 Tbps⁴ per fiber pair
- Boca Raton to stubbed branching unit on BRUSA system (four fiber pairs): 24.5 Tbps per fiber pair
- Boca Raton to Baby Beach, Aruba (two fiber pairs): 23.3 Tbps per fiber pair
- Boca Raton to Willemstad, Curaçao (vía Baby Beach, Aruba) (one fiber pair): 22.3 Tbps
- Baby Beach, Aruba to Willemstad, Curaçao (seven fiber pairs): 38.7 Tbps per fiber pair
- Baby Beach, Aruba to Kralendijk, Bonaire (three fiber pairs): 14.8 Tbps per fiber pair
- Willemstad, Curaçao to Kralendijk, Bonaire (five fiber pairs): greater than 43 Tbps per fiber pair.

The Applicants have not yet made decisions about the initial lit capacity of the CELIA system. The Applicants expect the CELIA system to enter commercial service in the fourth calendar quarter of 2027. In **Appendix E**, the Applicants provide a route map for the CELIA system.

³ Since both Le Lamentin and Saint-Barthélemy share a single fiber pair on the trunk, the Boca Raton to Le Lamentin fiber pair's 22.1 Tbps design capacity includes up to 2.2 Tbps capacity potential to serve Saint-Barthélemy. Consequently, the capacity used to serve Saint-Barthélemy—up to 2.2 Tbps—will reduce on a similar amount the capacity availability between Boca Raton and Le Lamentin.

⁴ See prior footnote.

III. Landing Points⁵

The Applicants provide specific landing point information (including geographic coordinates and street addresses, where available, for beach manholes and CLSs) in the following appendices:

- **Appendix F:** Boca Raton, Florida
- **Appendix G:** San Juan, Puerto Rico
- **Appendix H:** Le Lamentin, Martinique
- **Appendix I:** Morris Bay, Antigua
- **Appendix J:** Saint Jean Bay, Saint-Barthélemy
- **Appendix K:** Baby Beach, Aruba
- **Appendix L:** Willemstad, Curaçao
- **Appendix M:** Kralendijk, Bonaire

IV. Regulatory Classification⁶

The Applicants will operate the CELIA system 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 the CELIA system to common-carrier regulation because the CELIA system will not operate on a common-carrier basis as defined in *NARUC I*.⁷ The courts have stated that “[t]he primary *sine qua non* of common carrier status is a

⁵ 47 C.F.R § 1.767(a)(5).

⁶ *Id.* § 1.767(a)(6).

⁷ *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”),

quasi-public character, which arises out of the undertaking ‘to carry for all people indifferently.’”⁸ On the CELIA system, however, none of the Applicants will sell capacity, fiber pair usage, rights, or spectrum indifferently to the user public. Instead, the Applicants and their affiliates will use capacity on CELIA for their own internal business purposes and offer capacity available to third parties pursuant to individually-negotiated 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.⁹

Second, the Commission should not subject the CELIA system to common-carrier regulation because there is no legal compulsion or other public-interest reason for the Applicants to operate the CELIA system in such a manner. Under the *NARUC I* test, the Commission must determine whether the public interest requires common-carrier operation of the submarine cable system.¹⁰ Traditionally, the Commission has focused on whether the applicant has sufficient

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).

⁸ *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)).

⁹ *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).

¹⁰ *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”).

market power to warrant common carrier regulation,¹¹ 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.¹² The CELIA system poses no such competitive or other public-interest concerns. The CELIA system will enhance competition by competing vigorously with other submarine cable systems on the relevant routes:

- **U.S.-Martinique route:** CELIA will compete with the Eastern Caribbean Fiber System and Southern Caribbean Fiber system.
- **U.S.-Antigua and Barbuda route:** CELIA will compete with the Eastern Caribbean Fiber System and the Southern Caribbean Fiber system.
- **U.S.-Saint-Barthélemy route:** CELIA will compete with the Global Caribbean Network system.
- **U.S.-Aruba route:** CELIA will compete with the Pacific Caribbean Cable System (“PCCS”) and a combination of the Alonso de Ojeda and ARCOS systems.
- **U.S.-Curaçao route:** CELIA will compete with the ARCOS and PCCS systems.
- **U.S.-Bonaire route:** CELIA will compete with a combination of the Jerry Newton, ARCOS, and PCCS systems.

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

¹² See *AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13,066, 13,080 ¶ 39 (2000) (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”).

The Commission has previously found that facilities need not be identical in order to offer pro-competitive benefits.¹³ The existence of ample competing submarine cable facilities providing connectivity on the U.S.-Martinique, U.S.-Antigua and Barbuda, U.S.-Saint-Barthélemy, U.S.-Aruba, U.S.-Curaçao, and U.S.-Bonaire routes ensures that the CELIA system would not function as a bottleneck facility on any of those routes. The Applicants’ intended operation of the CELIA system therefore serves the Commission’s long-standing policy to encourage competition through private submarine cable transmissions, pursuant to which the Commission has granted numerous cable landing licenses.¹⁴

V. Cable Ownership Information¹⁵

The Applicants and their affiliates will own and control the CELIA system as shown in Tables 1 through 3 below.

Table 1: Ownership and Control of CELIA System in Aggregate¹⁶

Party	Voting and Participation Interest (%)
Telxius Cable América	16.87
Telxius Cable USA	1.81
Telxius Cable Puerto Rico	0.70
APUA	10.13
Orange S.A. (“Orange Parent”)	29.85
OCUSA	1.71

¹³ *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”).

¹⁴ *See Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1041 (1985).

¹⁵ 47 C.F.R. § 1.767(a)(7).

¹⁶ Due to rounding of numbers, total for each segment might not add up to exactly 100 percent.

Party	Voting and Participation Interest (%)
SETAR	38.94

The voting and participation interests in Table 1 aggregate the following interests: (1) the parties' investments in the baseline system (with one fiber pair on each applicable segment); (2) the parties' investments in additional fiber pairs and/or additional works; and (3) inter-party liability adjustments.

Table 2: Ownership and Control of CELIA System by Segment¹⁷

Segment	Party	Portion in U.S. Territory (%)	Portion in International Waters (%)	Portion in Territory of Landing Country (%)
Segment 1 (Le Lamentin, Martinique to BU ATG)	Orange Parent	not applicable	100	100
Segment 2 (BU ATG to Morris Bay, Antigua)	APUA	not applicable	100	100
Segment 3 (BU ATG to BU CSB)	Orange Parent	not applicable	62.95	not applicable
	APUA	not applicable	23.69	not applicable
	SETAR	not applicable	7.34	not applicable
	Telxius Cable America	not applicable	6.02	not applicable
Segment 4 (BU CSB to Saint-Barthélemy)	Orange Parent	not applicable	100	100
Segment 5 (BU CSB to BU EUS)	Orange Parent	not applicable	62.48	not applicable
	APUA	not applicable	22.07	not applicable
	SETAR	not applicable	8.49	not applicable

¹⁷ Due to rounding of numbers, total for each segment might not add up to exactly 100 percent.

Segment	Party	Portion in U.S. Territory (%)	Portion in International Waters (%)	Portion in Territory of Landing Country (%)
	Telxius Cable America	not applicable	6.96	not applicable
Segment 6 (BU EUS to Sint Eustatius cable stub)	SETAR	not applicable	100	not applicable
Segment 7 (BU EUS to BU SJU)	Telxius Cable América	not applicable	6.35	not applicable
	APUA	not applicable	20.13	not applicable
	Orange Parent	not applicable	60.48	not applicable
	SETAR	not applicable	13.03	not applicable
Segment 8 (BU SJU to BRUSA BU)	Telxius Cable América	0	100	not applicable
	Telxius Cable Puerto Rico	100	0	not applicable
Segment 9 (BU SJU to BU BAB)	Telxius Cable América	not applicable	45.12	not applicable
	Telxius Cable Puerto Rico	not applicable	1.62	not applicable
	APUA	not applicable	11.35	not applicable
	Orange Parent	not applicable	32.12	not applicable
	SETAR	not applicable	9.79	not applicable
Segment 10 (BU BAB to BU AUA)	SETAR	not applicable	100	not applicable
Segment 11 (BU BAB to Boca Raton, Florida)	Telxius Cable América	0	35.49	not applicable
	Telxius Cable USA	35.49	0	not applicable
	APUA	9.13	9.13	not applicable
	Orange Parent	0	26.10	not applicable
	OCUSA	26.10	0	not applicable
	SETAR	29.28	29.28	not applicable
Segment 12 (BU AUA to Baby Beach, Aruba)	SETAR	not applicable	100	100

Segment	Party	Portion in U.S. Territory (%)	Portion in International Waters (%)	Portion in Territory of Landing Country (%)
Segment 13 (BU AUA to BU CUR)	SETAR	not applicable	100	not applicable
Segment 14 (BU CUR to Willemstad, Curaçao)	SETAR	not applicable	100	100
Segment 15 (BU CUR to Kralendijk, Bonaire)	SETAR	not applicable	100	100

Table 3: Ownership and Control of CELIA System by Fiber Pair

Fiber Pair #	Owner of Portion in U.S. Territory		Owner of Portion in International Waters		Owner of Portion in Territory of Foreign Landing Country
1	OCUSA		Orange Parent		Orange Parent
2	not applicable		Orange Parent		Orange Parent
3	APUA	40.00%	APUA	40.00%	APUA
	Orange Parent	0%	Orange Parent	15.96%	
	OCUSA	15.96 %	OCUSA	0%	
	SETAR	15.96%	SETAR	15.96%	
	Telxius Cable América	0%	Telxius Cable América	13.09%	
	Telxius Cable USA	13.09%	Telxius Cable USA	0%	
4	not applicable		APUA		APUA
5	Telxius Cable USA		Telxius Cable América		not applicable
6	Telxius Cable USA		Telxius Cable América		not applicable
7	Telxius Cable USA		Telxius Cable América		not applicable
8	Telxius Cable USA		Telxius Cable América		not applicable
9	SETAR		SETAR		SETAR

Fiber Pair #	Owner of Portion in U.S. Territory	Owner of Portion in International Waters	Owner of Portion in Territory of Foreign Landing Country
10	SETAR	SETAR	SETAR
11	not applicable	SETAR	not applicable
12	not applicable	SETAR	SETAR
13	not applicable	SETAR	SETAR
14	not applicable	SETAR	SETAR
15	not applicable	SETAR	SETAR
16	not applicable	SETAR	SETAR
17	not applicable	SETAR	SETAR
18	not applicable	SETAR	SETAR
19	not applicable	SETAR	SETAR
20	not applicable	SETAR	SETAR
21	not applicable	SETAR	SETAR
22	not applicable	SETAR	SETAR
23	not applicable	SETAR	SETAR
24	not applicable	SETAR	SETAR
25	not applicable	SETAR	SETAR
26	not applicable	SETAR	SETAR

The CELIA system's CLSs will be owned and controlled as shown in Table 4 below:

Table 4: Control and Ownership of CLSs

Landing	New or Existing Facility?	Control	Ownership
Boca Raton, Florida	Existing	Telxius Cable USA	Telxius Cable USA
San Juan, Puerto Rico	Existing	Telxius Cable Puerto Rico	Telxius Cable Puerto Rico
Le Lamentin, Martinique	Existing	Orange Parent	Orange Parent
Morris Bay, Antigua	Existing	APUA	APUA
Saint-Barthélemy	Existing	Collectivité de Saint-	Collectivité de Saint-

Landing	New or Existing Facility?	Control	Ownership
		Barthélemy ¹⁸	Barthélemy ¹⁹
Baby Beach, Aruba	Existing	SETAR	SETAR
Willemstad, Curaçao	New	SETAR / AquaTel N.V.	AquaTel N.V.
Kralendijk, Bonaire	New	SETAR / SSCS B.V.	SSCS B.V.

Orange Parent is not required to be an applicant because it does not (a) own or control a U.S. CLS where the CELIA system lands or (b) use the U.S. endpoint of the CELIA system.²⁰ Instead, Orange Parent’s U.S. affiliate, OCUSA, will own and control the U.S. interests in CELIA. Neither AquaTel N.V. nor SSCS B.V. nor Collectivité de Saint-Barthélemy is required to be an applicant because none owns or controls (a) a U.S. CLS where the CELIA system lands or (b) a five-percent-or-greater interest in the CELIA system.

VI. Certification Regarding Service to Executive Branch Agencies²¹

As indicated in the attached certificate of service, the Applicants have sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense.

VII. Response to Standard Questions of Executive Branch Agencies²²

In parallel with the filing of this application with the Commission, the Applicants have (a) submitted to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Team Telecom”) a response to the 2021 standard

¹⁸ Collectivité de Saint-Barthélemy is the local governmental and administrative authority for this autonomous French island

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.* § 1.767(j).

²² See 47 C.F.R. §§ 1.40003(a), 63.18(p); see also *Requirements for Applications and Petitions Subject to Executive Branch Review*, available at <https://www.fcc.gov/international-affairs/requirements-applications-and-petitions-subject-executive-branch-review>.

questions, and (b) provided (or will within three business days of filing provide) Team Telecom with a complete and unredacted copy of this application.

[Signature on following page]

CONCLUSION

For the foregoing reasons, the Commission should expeditiously grant this cable landing license application for the CELIA system.

Respectfully submitted,

**Telxius Cable USA, Inc.
(as Lead Applicant)**

A handwritten signature in dark ink, appearing to read 'Guillermo Cañete', is written over a horizontal line.

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July 25, 2025

Attachments

LIST OF APPENDICES

Appendix A: Telxius Cable USA, Inc., Telxius Cable Puerto Rico, Inc., and Telxius Cable América, S.A., Disclosures and Certifications

Appendix B: Antigua Public Utilities Authority Disclosures and Certifications

Appendix C: France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA, Disclosures and Certifications

Appendix D: SETAR NV Disclosures and Certifications

Appendix E: CELIA System Route Map

Appendix F: Boca Raton, Florida Landing Point Information

Appendix G: San Juan, Puerto Rico Landing Point Information

Appendix H: Le Lamentin, Martinique Landing Point Information

Appendix I: Morris Bay, Antigua Landing Point Information

Appendix J: Saint Jean Bay, Saint-Barthélemy Landing Point Information

Appendix K: Baby Beach, Aruba Landing Point Information

Appendix L: Willemstad, Curaçao Landing Point Information

Appendix M: Kralendijk, Bonaire Landing Point Information

APPENDIX A:

Telxius Cable USA, Inc., Telxius Cable Puerto Rico, Inc., and Telxius Cable América, S.A., Disclosures and Certifications

1. Applicants' Names, Addresses, Telephone Numbers, and Places of Organization²³

In Table A-1 below, Telxius Cable USA, Inc. ("Telxius Cable USA"), Telxius Cable Puerto Rico, Inc. ("Telxius Cable Puerto Rico"), and Telxius Cable América, S.A. ("Telxius Cable América"), provide their addresses, telephone numbers, places of organization, and FCC Registration Numbers ("FRNs").

Table A-1: Applicant Information

Name, Address, Telephone Number	Place of Organization	FRN
Telxius Cable USA, Inc. 1111 Brickell Avenue, Suite 1800 Miami, Florida 33131-3122 +1 305 925 5256	Florida	0006650618
Telxius Cable Puerto Rico, Inc. 1111 Brickell Avenue, Suite 1800 Miami, Florida 33131-3122 +1 305 925 5256	Puerto Rico	0022340921
Telxius Cable América, S.A. Av. Luis Alberto de Herrera 1248, piso 4 11300 Montevideo, Uruguay +598 2 628 00 20	Uruguay	0022340871

B. Contact Information²⁴

The Commission should address correspondence regarding this application to the persons noted in Table A-2 below:

²³ 47 C.F.R. § 1.767(a)(1), (2).

²⁴ *Id.* § 1.767(a)(3).

Table A-2: Applicant Contact Information

Party	Company Officer Contact	Counsel Contact
Telxius Cable USA, Inc. and Telxius Cable Puerto Rico, Inc.	Guillermo Cañete President Telxius Cable USA, Inc. Telxius Cable Puerto Rico, Inc. 1111 Brickell Avenue, Suite 1800 Miami, Florida 33131-3122	Kent Bressie HWG LLP 1919 M Street, N.W., Suite 800 Washington, D.C. 20036-3537 +1 202 730 1337 kbressie@hwglaw.com
Telxius Cable América, S.A.	Juan Pablo Rosati Abogado Telxius Cable América S.A. Avenida Luis Alberto de Herrera 1248, piso 4 11300 Montevideo Uruguay	

2. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates²⁵

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they have the following 10-percent-or-greater interest holders:

Telxius Cable América, S.A. (“Telxius Cable América”)

Address: Avenida Luis Alberto de Herrera 1248, piso 4, 11300 Montevideo, Uruguay

Place of Organization: Uruguay

Principal Business: telecommunications

Interest Held: Telxius Cable América holds a 100-percent voting-and-equity interest in Telxius Cable Puerto Rico.

Telxius Telecom, S.A. (“Telxius Parent”)

Address: Distrito C, Calle Ronda de la Comunicación s/n, Edificio Sur 3, 28050 Madrid, Spain

Place of Organization: Spain

Principal Business: telecommunications

Interest Held: Telxius Parent holds a 100-percent voting-and-equity interest in Telxius Cable USA and Telxius Cable América.

Telefónica S.A. (“Telefónica”)

Address: Distrito C, Calle Ronda de la Comunicación s/n, Edificio Central, 28050 Madrid, Spain

²⁵ *Id.* §§ 1.767(a)(8)(i), 63.18(h).

Place of Organization: Spain

Principal Business: telecommunications

Interest Held: Telefónica holds a 70-percent voting-and-equity interest in Telxius Parent, giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 70-percent equity interests and 100-percent voting equity interest in Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América. Telefónica’s shares trade publicly on the four Spanish stock exchanges (the Madrid Barcelona, Valencia, and Bilbao Stock Exchange), as well as on the New York Stock Exchange and the Lima Stock Exchange, on these two exchanges through American Depositary Shares (“ADSs”), each ADS representing one share. As there is an active market in Telefónica’s shares, Telefónica’s share ownership is always fluid. Moreover, the Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América can ascertain significant shareholders only on the basis of Telefónica’s records and may not know of possibly related or affiliated shareholders that are not disclosed to Telefónica. Recognizing these limitations, as of the most recent measurable date, July 21, 2025, no Telefónica shareholder holds an interest sufficient to give it a 10-percent-or-greater direct or indirect interest in Telxius Cable USA, Telxius Cable Puerto Rico, or Telxius Cable América.

Sociedad Estatal de Participaciones Industriales (“SEPI”)

Address: Calle Velázquez, 134, Madrid

Place of Organization: Spain

Principal Business: sovereign wealth fund

Interest Held: SEPI holds a 10-percent voting and equity interest in Telefónica, S.A., giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect, 10-percent voting interest in each of Telxius Cable USA, Telxius Cable Puerto Rico and Telxius Cable América and an indirect 7-percent equity interest in each of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América.

Pontegadea Inversiones, S.L. (“Pontegadea”)

Address: Cantón Grande, 4, 15003 A Coruña, Spain

Place of Organization: Spain

Principal Business: investment holding company

Interest Held: Pontegadea holds a 30-percent voting-and-equity interest in Telxius Parent and certain negative control rights granted pursuant to a Shareholders Agreement imposing supermajority voting requirements for certain reserved matters, requirements for resolving deadlocks, management limitations, and restrictions on certain related-party transactions. These arrangements, which the Commission has previously reviewed, are detailed at length in FCC File Nos. SCL-T/C-20220222-00006, SCL-T/C-20220222-00007, SCL-T/C-20220222-00008, and SCL-T/C-20220222-00009. Pontegadea therefore holds (according to the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 30-percent voting-and-equity interest in, and the aforementioned negative control rights over, Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América.

Mr. Amancio Ortega Gaona

Address: Cantón Grande, 4, 15003 A Coruña, Spain

Citizenship: Spain

Principal Business: investments

Interest Held: Mr. Ortega holds 99.99-percent voting and equity interest in Pontegadea, giving him (under the Commission's ownership calculation rules in 47 C.F.R. § 63.18(h)) an approximate indirect 30-percent voting-and-equity interest in, and the aforementioned negative control rights over, Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América.

Other than the entities and persons noted above, no entity or person holds a 10-percent-or-greater direct or indirect voting or equity interest in either of Telxius Cable USA, Telxius Cable Puerto Rico, or Telxius Cable América. The ownership structure of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América is shown in Exhibit A-1.

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they have no interlocking directorates with foreign carriers.

3. Anti-Drug Abuse Act Certification²⁶

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they are not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.²⁷

4. Law Enforcement Certifications²⁸

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they will:

²⁶ *Id.* § 1.767(a)(8)(i), 63.18(o).

²⁷ *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

²⁸ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that CELIA system will operate on a non-common carrier basis);²⁹
- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);³⁰
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

Guillermo Cañete
 President
 Telxius Cable USA, Inc.
 Telxius Cable Puerto Rico, Inc.
 1111 Brickell Avenue, Suite 1800
 Miami, Florida 33131-3122
 +1 305 925 5433
 guillermo.canete@telxius.com

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;³¹

²⁹ *Id.* § 63.18(q)(1)(i).

³⁰ *Id.* § 63.18(q)(1)(ii).

³¹ *Id.* § 63.18(q)(1)(iv)(B).

- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;³² and
- Acknowledge that if they fail to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q), or in the grant of an application or authorization, and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.³³

5. Certification Regarding Foreign Carrier Status and Foreign Affiliations³⁴

Each of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certifies that it (A) is not a foreign carrier in any foreign destination country; (B) does not own or control a CLS in any foreign destination country; and (C) is affiliated with foreign carriers, including foreign carriers that own or control CLSs identified in Table A-3 below where the CELIA system will land. None of the CLSs noted below are in a foreign destination country for the CELIA system.

³² *Id.* § 63.18(q)(v).

³³ *Id.* § 63.18(q)(iv)(A).

³⁴ *Id.* § 1.767(a)(8)(ii).

**Table A-3:
Affiliated Foreign Carriers and CLS Interests**

Country	Entity	Owns/ Controls CLS
Argentina	Telefónica Global Solutions Argentina, S.A.	N
	Telxius Cable Argentina S.A.	Y
Austria	Telefónica Global Solutions S.L. Unipersonal, Austrian Branch	N
Belgium	Telefónica Global Solutions, S.L.	N
Brazil	Telefónica Global Solutions Brasil Ltda.	N
	Telefónica Brasil, S.A.	N
	Telxius Cable Brasil Limitada	Y
Chile	Telefónica Chile, S.A.	N
	Telxius Cable Chile S.A.	Y
	Telefónica Móviles Chile, S.A.	N
	Telefónica Global Solutions Chile S.p.A.	N
Colombia	Colombia Telecomunicaciones, S.A. ESP BIC ³⁵	Y
	Telxius Cable Colombia S.A.	Y
	Telefónica Global Solutions Colombia, S.A.S. (fka TIWS Colombia II S.A.S.)	N
Denmark	Telefónica Global Solutions Denmark, Branch of Telefónica Global Solutions, S.L.U. Spain	N
Dominican Republic	Telxius Cable República Dominicana S.A.S.	Y
Ecuador	Otecel, S.A. ³⁶	N
	Telxius Cable Ecuador S.A. (fka Telefónica International Wholesale Services Ecuador S.A.)	Y
	Telefónica Global Solutions Ecuador TGSE, S.A.	N
France	Telefónica Global Solutions France II, S.A.S.	N
	Telefónica Global Solutions France, S.A.S.	N
Germany	E-Plus Mobilfunk GmbH	N
	Telefónica Germany GmbH & Co. OHG	N
	Telefónica Global Solutions Germany GmbH	N
Greece	Telefónica Global Solutions Greece Ltd.	N
Guatemala	Telxius Cable Guatemala, S.A.	Y
Hong Kong	Telefónica Global Solutions, S.L.	N
Ireland	Virgin Media Wholesale Limited	Y
Italy	Telefónica Global Solutions, S.L.	N

³⁵ Telefónica has entered into a transaction to divest this entity, but the transaction has not yet closed.

³⁶ Telefónica has entered into a transaction to divest this entity, but the transaction has not yet closed.

Country	Entity	Owens/ Controls CLS
Mexico	Pegaso PCS, S.A. de C.V.	N
	Telefónica Global Solutions México, S.A. de C.V.	N
	Telxius México, S. de R.L. de C.V. ³⁷	Y
Netherlands	Telefónica Global Solutions Netherlands	N
Panama	Telxius Cable Panamá S.A.	Y
Peru	Telxius Cable Perú, S.A.C.	Y
	Telefónica Global Solutions Perú, S.A.C.	N
Poland	Telefónica Global Solutions, S.L. Jednoosobowa (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce	N
Portugal	Telefónica Global Solutions, S.L.U. Sucursal em Portugal	N
Singapore	Telefónica Global Solutions, Singapore Pte. Ltd.	N
Spain	Telefónica de España S.A.U.	Y
	Telefónica Global Solutions, S.L.U.	N
	Telefónica Móviles España S.A.U.	N
	Telxius Cable España S.L.	Y
	Telefónica IoT, Big Data Tech SAU	N
Sweden	Telefónica Global Solutions Sweden AB	N
Switzerland	Telefónica International Wholesale Services II, S.L.U, Madrid, Swiss Branch Zurich	N
United Kingdom	Telefónica UK, Ltd.	N
	Virgin Media Wholesale Limited	Y
	VMED O2 UK Limited d/b/a Virgin Media O2	N
Uruguay	Telefónica Móviles del Uruguay, S.A. ³⁸	N
Venezuela	Telefónica Venezolana, C.A.	N

6. Certification Regarding Foreign Destination Countries³⁹

Each of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certifies that: (A) it is not a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire, the six foreign destination countries in which the

³⁷ Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América are identifying this affiliate prospectively.

³⁸ Telefónica has entered into a transaction to divest this entity, but the transaction has not yet closed.

³⁹ 47 C.F.R. § 1.767(a)(8)(iii).

Applicants seek to land and operate the CELIA system; (B) it does not control a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; (C) no entity owning more than 25 percent of it or controlling it controls foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; and (D) no grouping of two or more foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire (or parties that control foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire) own, in aggregate, more than 25 percent of it 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 on the CELIA system in the United States.

7. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries⁴⁰

No response is required, as neither Telxius Cable USA nor Telxius Cable Puerto Rico nor Telxius Cable América identified any non-WTO member countries in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

8. Certification Regarding Routine Conditions⁴¹

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they accept and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

9. Streamlining⁴²

Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that they qualify for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1), as they are not

⁴⁰ *Id.* § 1.767(a)(8)(iv).

⁴¹ *Id.* § 1.767(a)(9).

⁴² *Id.* § 1.767(k).

affiliated with foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire.

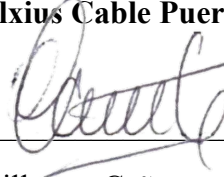
Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América certify that the application qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and certify that they are not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Florida—the only state in which the CELIA system will land and in which new wet-segment construction will occur (as the facilities in Puerto Rico territory have already been constructed)—does not list a cable landing license as a federal activity requiring a consistency certification.⁴³

[Signatures on following page]

⁴³ See Florida’s Federal Listed Actions, <https://coast.noaa.gov/data/czm/consistency/media/fl.pdf>.

Respectfully submitted,

Telxius Cable USA, Inc.
Telxius Cable Puerto Rico, Inc.

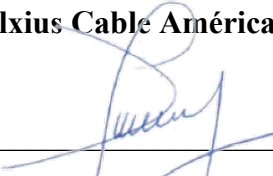


Guillermo Cañete
President
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Telxius Cable Puerto Rico, Inc.
1111 Brickell Avenue, Suite 1800
Miami, Florida 33131-3122

Kent Bressie
Colleen Sechrest
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Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for
Telxius Cable USA, Inc.,
Telxius Cable Puerto Rico, Inc., and
Telxius Cable América, S.A.

Telxius Cable América, S.A.

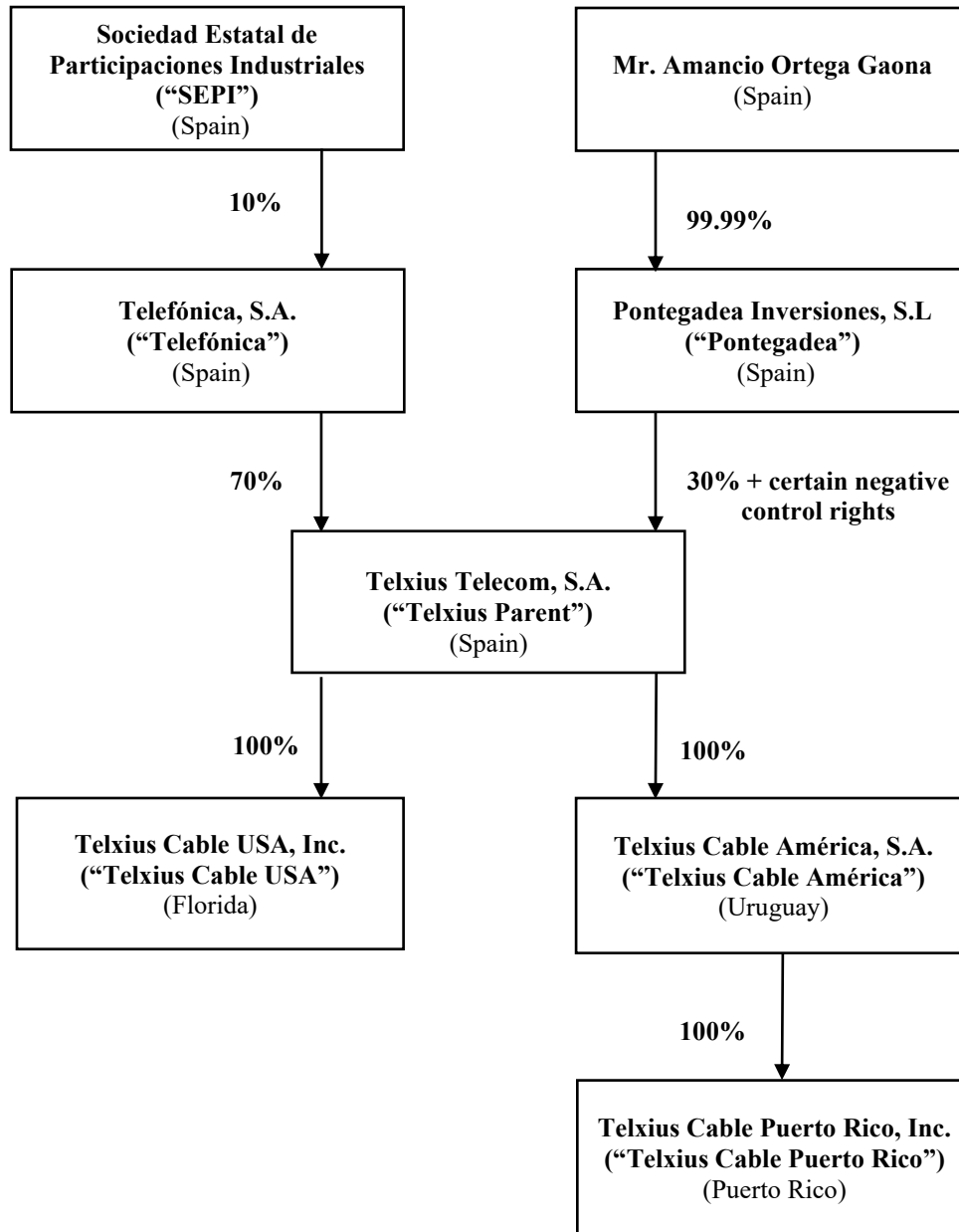


Gabriel Zadikian
President
Telxius Cable América S.A.
Avenida Luis Alberto de Herrera 1248, piso 4
11300 Montevideo
Uruguay

July 25, 2025

EXHIBIT A-1:

Ownership Structure of Telxius Cable USA, Telxius Cable Puerto Rico, and Telxius Cable América



Note: Unless otherwise indicated, percentages represent both voting and equity interests

APPENDIX B:

ANTIGUA PUBLIC UTILITIES AUTHORITY DISCLOSURES AND CERTIFICATIONS

1. Applicant's Name, Address, Telephone Number, and Place of Organization⁴⁴

In Table B-1 below, the Antigua Public Utilities Authority ("APUA") provides its address, telephone number, place of organization, and FCC Registration Number ("FRN").

Table B-1: Applicant Information

Name, Address, Telephone Number	Place of Organization	FRN
Antigua Public Utilities Authority Independence Avenue and High Street P. O. Box 416 St. John's, Antigua +1 268 480 7000	Antigua and Barbuda	0036204824

B. Contact Information⁴⁵

The Commission should address correspondence regarding this application to the persons noted in Table B-2 below:

⁴⁴ 47 C.F.R. § 1.767(a)(1), (2).

⁴⁵ *Id.* § 1.767(a)(3).

Table B-2: Applicant Contact Information

Party	Company Officer Contacts	Legal Counsel
Antigua Public Utilities Authority	John Bradshaw Chief Executive Officer Antigua Public Utilities Authority Independence Avenue and High Street St. John's, Antigua +1 268 480 7118 jbradshaw@apua.ag Vaughn Brown Telecoms Business Unit Manager Antigua Public Utilities Authority Independence Avenue and High Street St. John's, Antigua +1 268 480 7105 vaughn@apua.ag	Ulises R. Pin Leetal Weiss Morgan Lewis & Bockius LLP 1111 Pennsylvania Ave. N.W. Washington, D.C. 20004-2541 +1 202 739 3000 ulises.pin@morganlewis.com leetal.weiss@morganlewis.com

2. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁴⁶

APUA certifies that it has the following 10-percent-or-greater interest holders:

The Government of Antigua and Barbuda

Address: Queen Elizabeth Highway, St. John's, Antigua

Place of Organization: Antigua and Barbuda

Principal Business: telecommunications

Interest Held: The Government of Antigua and Barbuda holds a 100-percent voting and equity interest in APUA.

Other than the entities and persons noted above, no entity holds a 10-percent-or-greater direct or indirect voting or equity interest in APUA. The ownership structure of APUA is shown in Exhibit B-1.

⁴⁶ *Id.* §§ 1.767(a)(8)(i), 63.18(h).

APUA certifies that it has no interlocking directorates with foreign carriers.

3. Anti-Drug Abuse Act Certification⁴⁷

APUA certifies that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁴⁸

4. Law Enforcement Certifications⁴⁹

APUA certifies that it will:

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that CELIA system will operate on a non-common carrier basis);⁵⁰
- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);⁵¹
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

⁴⁷ *Id.* § 1.767(a)(8)(i), 63.18(o).

⁴⁸ *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

⁴⁹ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

⁵⁰ *Id.* § 63.18(q)(1)(i).

⁵¹ *Id.* § 63.18(q)(1)(ii).

Ulises R. Pin
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2541
+1 202 739 3000
ulises.pin@morganlewis.com

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;⁵²
- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;⁵³ and
- Acknowledge that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q), or in the grant of an application or authorization, and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.⁵⁴

⁵² *Id.* § 63.18(q)(1)(iv)(A).

⁵³ *Id.* § 63.18(q)(iv)(B).

⁵⁴ *Id.* § 63.18(q)(v).

5. Certification Regarding Foreign Carrier Status and Foreign Affiliations⁵⁵

APUA certifies that it (A) is a foreign carrier in Antigua and Barbuda; (B) owns and controls a CLS in Antigua and Barbuda; and (C) is not affiliated with foreign carriers, including foreign carriers that own or control CLSs in any foreign destination country where the CELIA system will land.

6. Certification Regarding Foreign Destination Countries⁵⁶

APUA certifies that: (A) it is a foreign carrier in Antigua and Barbuda, one of the six foreign destination countries in which the Applicants seek to land and operate the CELIA system; (B) it does not control a foreign carrier in Antigua and Barbuda, Martinique, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; (C) no entity owning more than 25 percent of it or controlling it controls foreign carriers in Antigua and Barbuda, Martinique, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; and (D) no grouping of two or more foreign carriers in Antigua and Barbuda, Martinique, Saint-Barthélemy, Aruba, Curaçao, or Bonaire (or parties that control foreign carriers in Antigua and Barbuda, Martinique, Saint-Barthélemy, Aruba, Curaçao, or Bonaire) own, in aggregate, more than 25 percent of it 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 on the CELIA system in the United States.

7. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries⁵⁷

No response is required, as APUA has not identified any non-WTO member countries in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

⁵⁵ *Id.* § 1.767(a)(8)(ii).

⁵⁶ *Id.* § 1.767(a)(8)(iii).

⁵⁷ *Id.* § 1.767(a)(8)(iv).

8. Certification Regarding Routine Conditions⁵⁸

APUA certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

9. Streamlining⁵⁹

APUA qualifies for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3). It certifies that it is a foreign carrier in Antigua and Barbuda having a 50-percent-or-greater market share of the local access market. However, APUA does not have a dominant position in the international transport market to and from Antigua and Barbuda. APUA agrees to comply with the reporting requirements specified in 47 C.F.R. § 1.767(l).

APUA certifies that the application qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and 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). Florida—the only state in which the CELIA system will land—does not list a cable landing license as a federal activity requiring a consistency certification.⁶⁰

[Signature on following page]

⁵⁸ *Id.* § 1.767(a)(9).

⁵⁹ *Id.* § 1.767(k).

⁶⁰ *See* Florida’s Federal Listed Actions,
<https://coast.noaa.gov/data/czm/consistency/media/fl.pdf>.

Respectfully submitted,

Antigua Public Utilities Authority

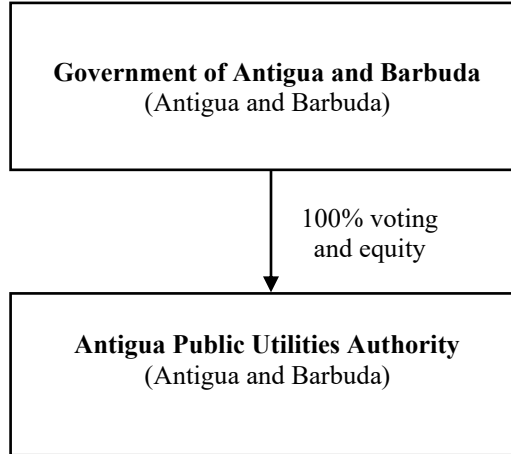
A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by a horizontal line and a small flourish.

John Bradshaw
Chief Executive Officer
Antigua Public Utilities Authority
Independence Avenue and High Street
St. Johns, Antigua

July 25, 2025

EXHIBIT B-1:

Ownership Structure of Antigua Public Utilities Authority



APPENDIX C:

FRANCE TELECOM LONG DISTANCE USA, LLC D/B/A ORANGE CARRIERS USA, DISCLOSURES AND CERTIFICATIONS

1. Applicant's Name, Address, Telephone Number, and Place of Organization⁶¹

In Table C-1 below, France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA ("OCUSA") provides its address, telephone number, place of organization, and FCC Registration Number ("FRN").

Table C-1: Applicant Information

Name, Address, Telephone Number	Place of Organization	FRN
France Telecom Long Distance USA, LLC d/b/a Orange Carriers USA 11921 Freedom Drive, Suite 720 Reston, Virginia 20190. +1 703 471 2458	Delaware	0016295008

B. Contact Information⁶²

The Commission should address correspondence regarding this application to the persons noted in Table C-2 below:

⁶¹ 47 C.F.R. § 1.767(a)(1), (2).

⁶² *Id.* § 1.767(a)(3).

Table C-2: Applicant Contact Information

Company Officer Contact
Danielle Aguto Secretary 11921 Freedom Drive, Suite 720 Reston, Virginia 20190 +1 703 471 2458 danielle.aguto@orange.com

2. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶³

OCUSA certifies that it has the following 10-percent-or-greater interest holders:

Orange Participations Holding Inc. (“OPH”)

Address: 11921 Freedom Drive, Suite 720, Reston, Virginia 20190

Place of Organization: Delaware

Principal Business: holding company

Interest Held: OPH holds a 100-percent voting and equity interest in OCUSA.

Orange Participations U.S. Inc. (“OPUS”)

Address: 11921 Freedom Drive, Suite 720, Reston, Virginia 20190.

Place of Organization: Delaware

Principal Business: holding company

Interest Held: OPUS holds a 100-percent voting and equity interest in OPH, giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 100-percent voting and equity interest in OCUSA.

Orange S.A. (“Orange Parent”)

Address: 111, quai du Président Roosevelt, 92449 Issy les Moulineaux Cedex, France

Place of Organization: France

Principal Business: telecommunications

Interest Held: Orange Parent holds a 100-percent voting and equity interest in OPUS, giving it (under the Commission’s ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 100-percent voting and equity interest in OCUSA.

The French State

Address: 2 Agence des Participations de l’Etat Ministère de l’Economie, des Finances et de la Relance 139, rue de Bercy 75572 Paris Cedex 12, France

Place of Organization: France

Principal Business: government

⁶³ *Id.* §§ 1.767(a)(8)(i), 63.18(h).

Interest Held: The French State holds a 21-percent voting interest and a 13-percent equity interest in Orange Parent, giving it (under the Commission's ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 21-percent voting interest and a 13-percent equity interest in OCUSA.

Orange Group Savings Plan

Address: AMUNDI ESR 26956 Valence Cedex 9, France

Place of Organization: France

Principal Business: employee savings plan

Interest Held: Orange Group Savings Plan (through its management of the Orange Actions and Orange Ambition International mutual funds and shares held directly by employees in registered form) holds a 13-percent voting interest and an 8-percent equity interest in Orange Parent, giving it (under the Commission's ownership calculation rules in 47 C.F.R. § 63.18(h)) an indirect 13-percent voting interest and a 8-percent equity interest in OCUSA.

Other than the entities and persons noted above, no entity holds a 10-percent-or-greater direct or indirect voting or equity interest in OCUSA. The ownership structure of OCUSA is shown in Exhibit C-1.

OCUSA certifies that it has no interlocking directorates with foreign carriers.

3. Anti-Drug Abuse Act Certification⁶⁴

OCUSA certifies that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁶⁵

4. Law Enforcement Certifications⁶⁶

OCUSA certifies that it will:

⁶⁴ *Id.* § 1.767(a)(8)(i), 63.18(o).

⁶⁵ *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

⁶⁶ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that CELIA system will operate on a non-common carrier basis);⁶⁷
- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);⁶⁸
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

Name: Thiago Pereira

Title: Head of Network & Services Planning - Americas

Address: Orange Business Services, 100 Galleria Parkway SE, Suite 300, Atlanta Georgia 30339

Office telephone: +1 678 346 3665

Mobile telephone: +1 678 446 7797

Email: thiago.pereira@orange.com

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;⁶⁹

⁶⁷ *Id.* § 63.18(q)(1)(i).

⁶⁸ *Id.* § 63.18(q)(1)(ii).

⁶⁹ *Id.* § 63.18(q)(1)(iv)(B).

- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;⁷⁰ and
- Acknowledge that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q), or in the grant of an application or authorization, and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.⁷¹

5. Certification Regarding Foreign Carrier Status and Foreign Affiliations⁷²

OCUSA certifies that it (A) is not a foreign carrier in Antigua and Barbuda, Martinique, or Aruba, the six foreign destination countries in which the CELIA system will land; (B) does not own or control a CLS in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; and (C) is affiliated with foreign carriers, including foreign carriers that own or control CLSs in Martinique, as noted in Table C-3 below.

**Table C-3:
Affiliated Foreign Carriers and CLS Interests**

Country	Entity	Owns/ Controls CLS
Argentina	Orange Business Services Argentina S.A.	N

⁷⁰ *Id.* § 63.18(q)(v).

⁷¹ *Id.* § 63.18(q)(iv)(A).

⁷² *Id.* § 1.767(a)(8)(ii).

Country	Entity	Owns/ Controls CLS
Australia	Orange Business Services Australia Pty Ltd	N
Austria	Orange Business Austria GmbH	N
Bahrain	EGN B.V. EQUANT GLOBAL NETWORK (Foreign Branch)	N
Belgium	Orange Belgium	N
	Orange Business Belgium S.A.	N
Botswana	Orange Botswana	N
Brazil	Orange Business Services Brasil Ltda	N
Bulgaria	Equant Bulgaria Ltd.	N
Burkina Faso	Orange Burkina Faso	N
Cameroon	Orange Cameroon	N
Canada	Orange Business Services Canada Inc.	N
Central African Republic	Orange Centrafrique	N
Chile	Orange Business Services Chile, S.A.	N
Colombia	Orange Business Services Colombia S.A.S.	N
Congo	Orange RDC	Y
Côte d'Ivoire	Orange Business Services Côte d'Ivoire	N
	Orange Côte d'Ivoire	Y
Czech Rep.	Orange Business Czech Republic s.r.o.	N
Denmark	Orange Business Denmark A/S	N
Egypt	Equant Egypt for Communications S.A.E.	N
Finland	Orange Business Finland Oy	N
France	GlobeCast and Globecast Reportages	N
France	Orange Parent	Y
French Guiana	Orange Parent	Y
Georgia	Equant Georgia Limited	N
Germany	Orange Business Germany GmbH	N
Ghana	Equant Ghana Ltd.	N
Greece	Orange Business Communications Hellas. S.A.	N
Guadeloupe	Orange Parent	Y
Guinea	Orange Guinée Conakry	Y through SPV GUILAB
Guinea-Bissau	Orange Bissau	Y through SPV SCGB
Hong Kong	Globecast Hong Kong Ltd	N
	Orange Business Services Hong Kong Limited	N
Hungary	Orange Business Services Hungary Kft.	N

Country	Entity	Owns/ Controls CLS
India	Orange Business Services India Network Private Limited	N
	Globecast India Ltd	N
Ireland	Orange Business Telecommunications Services Ltd	N
Israel	France Telecom Israel	N
Italy	Orange Business Italy s.p.a.	N
Italy	Globecast Italia SRL	N
Japan	Orange Business Services Japan Co., Ltd.	N
Jordan	Jordan Telecommunications Company	N
Kazakhstan	Orange Business Kazakhstan LLP	N
Liberia	Orange Liberia	Y through SPV CCL
Luxembourg	Orange Business Luxembourg S.A.	N
	Orange Communications Luxembourg	N
Madagascar	Orange Madagascar	Y
Malaysia	Orange Business Services Malaysia Sdn. Bhd.	N
	Orange Business Services (Network) Sdn. Bhd.	N
Mali	Orange Mali	N
Martinique	Orange Parent	Y
Mauritius	Mauritius Telecom	Y
	Orange Business Services Mauritius Limited	N
Mayotte	Orange Parent	Y
Mexico	Orange Business Services Mexico. S.A. de C.V.	N
Moldova	Orange Moldova	N
Morocco	Méditel	N (under construction)
	Orange Business Maroc SARL	N
Netherlands	Orange Business Netherlands B.V.	N
New Zealand	Orange Business Services New Zealand Limited	N
Nigeria	Orange Business Communications Services Nigeria Ltd.	N
Norway	Orange Business Norway AS	N
Pakistan	Equant Pakistan (Private) Limited	N
Peru	Equant Peru S.A.	N
Poland	Orange Polska	Y
Portugal	Orange Business Portugal S.A.	N
Reunion	Orange S.A.	Y
Republic of Korea	Orange Business Services Korea Limited	N
Romania	Orange Business Romania S.A.	N
	Orange Romania	N
Russian Federation	Limited Liability Company “Orange Business Services”	N
	Globecast Moskva LLP	N

Country	Entity	Owens/ Controls CLS
Saint-Barthélemy	Orange S.A.	N
St. Pierre and Miquelon	SPM Telecom SAS	N
Senegal	Societe Nationale des Telecommunications	Y
Sierra Leone	Orange (SL) Limited	Y through SPV SALCAB
Singapore	Orange Business Services Singapore Pte, Ltd	N
Singapore	Globecast Asia Ltd	N
Slovakia	Orange Business Services Slovakia s.r.o.	N
Slovakia	Orange Slovensko	N
South Africa	Globecast South Africa PTY Ltd	N
South Africa	Orange Business Services South Africa (PTY) Ltd.	N
Spain	Orange Business Spain SAU	N
	Orange Espagne S.A. MasOrange	N
Sweden	Orange Business Sweden AB	N
Switzerland	Orange Business Switzerland AG	N
Taiwan	Orange Business Services Hong Kong Limited (Taiwan Branch)	N
Thailand	Orange Business Services (Thailand) Ltd.	N
Tunisia	Orange Tunisie	Y
Turkey	Orange Business Turkey Bilisim Anonim Sirketi	N
Ukraine	Orange Business Services Ukraine LLC	N
United Kingdom	Orange Business Holdings UK Limited	N
	Globecast UK Ltd	N
Venezuela	Equant Venezuela, S.A.	N
Wallis and Futuna	Orange Wallis et Futuna	N

6. Certification Regarding Foreign Destination Countries⁷³

OCUSA certifies that: (A) it is not a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire, the six foreign destination countries in which the Applicants seek to land and operate the CELIA system; (B) it does not control a foreign carrier in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; (C) an

⁷³ *Id.* § 1.767(a)(8)(iii).

entity owning more than 25 percent of it or controlling it (Orange Parent) controls foreign carriers in Martinique and Saint-Barthélemy; and (D) no grouping of two or more foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire (or parties that control foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire) own, in aggregate, more than 25 percent of it 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 on the CELIA system in the United States.

7. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries⁷⁴

No response is required, as OCUSA has not identified any non-WTO member countries in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

8. Certification Regarding Routine Conditions⁷⁵

OCUSA certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

9. Streamlining⁷⁶

OCUSA qualifies for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3). It certifies that it is affiliated with a foreign carrier in Martinique having a 50-percent-or-greater market share in the international-transport and local access markets. OCUSA agrees to comply with the reporting requirements specified in 47 C.F.R. § 1.767(l).

⁷⁴ *Id.* § 1.767(a)(8)(iv).

⁷⁵ *Id.* § 1.767(a)(9).

⁷⁶ *Id.* § 1.767(k).

OCUSA certifies that the application qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and 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). Florida—the only state in which the CELIA system will land—does not list a cable landing license as a federal activity requiring a consistency certification.⁷⁷

[Signature on following page]

⁷⁷ See Florida's Federal Listed Actions,
<https://coast.noaa.gov/data/czm/consistency/media/fl.pdf>.

Respectfully submitted,

**France Telecom Long Distance USA, LLC
d/b/a Orange Carriers USA**

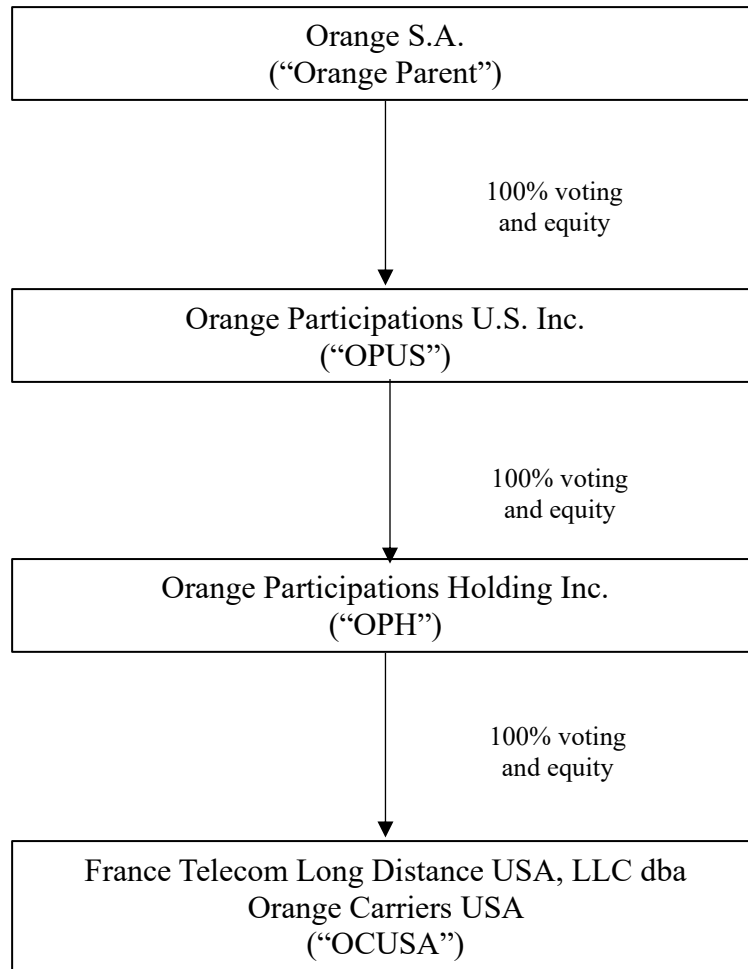
A handwritten signature in black ink, appearing to be 'D. Pugin', with a horizontal line extending to the right.

David Pugin
President
France Telecom Long Distance USA, LLC
d/b/a Orange Carriers USA
11921 Freedom Drive, Suite 720
Reston, Virginia 20190

July 25, 2025

EXHIBIT C-1:

**Ownership Structure of France Telecom Long Distance USA, LLC
d/b/a Orange Carriers USA**



APPENDIX D:
SERVICIO DI TELECOMUNICACION DI ARUBA (SETAR) N.V.
DISCLOSURES AND CERTIFICATIONS

1. Applicant’s Name, Address, Telephone Number, and Place of Organization⁷⁸

In Table D-1 below, Servicio di Telecomunicacion di Aruba (SETAR) N.V. (“SETAR”) provides its address, telephone number, place of organization, and FCC Registration Number (“FRN”).

Table D-1: Applicant Information

Name, Address, Telephone Number	Place of Organization	FRN
Servicio di Telecomunicacion di Aruba (SETAR) N.V. Administration Building, Seroe Blanco 29A Oranjestad, Aruba + 297 (525) 1000	Aruba	0031091564

B. Contact Information⁷⁹

The Commission should address correspondence regarding this application to the persons noted in Table D-2 below:

⁷⁸ 47 C.F.R. § 1.767(a)(1), (2).

⁷⁹ *Id.* § 1.767(a)(3).

Table D-2: Applicant Contact Information

Company Officer Contact
Z. Roland Croes Director Servicio di Telecomunicacion di Aruba (SETAR) N.V. Seroe Blanco 29A Oranjestad, Aruba + 297 525-1000 Roland.Croes@setar.aw

2. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁸⁰

SETAR certifies that it has the following 10-percent-or-greater interest holders:

Government of Aruba

Address: Smith Boulevard 72, Oranjestad, Aruba

Place of Organization: Kingdom of the Netherlands

Principal Business: government

Interest Held: The Government of Aruba holds a 100-percent voting and equity interest in SETAR.

Other than the entities and persons noted above, no entity holds a 10-percent-or-greater direct or indirect voting or equity interest in SETAR. The ownership structure of SETAR is shown in Exhibit D-1. SETAR certifies that it has the following interlocking directorate: Z. Roland Croes, a Director of SETAR is also a Director of TA Resources N.V., which is authorized to provide telecommunications services to the public in Aruba and the United States.

⁸⁰ *Id.* §§ 1.767(a)(8)(i), 63.18(h).

3. **Anti-Drug Abuse Act Certification**⁸¹

SETAR certifies that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.⁸²

4. **Law Enforcement Certifications**⁸³

SETAR certifies that it will:

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that CELIA system will operate on a non-common carrier basis);⁸⁴
- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);⁸⁵
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

Ulises R. Pin
Morgan Lewis Bockius LLP
1111 Pennsylvania Avenue NW
Washington, D.C. 20004
+1 202 739 3000
ulises.pin@morganlewis.com

⁸¹ *Id.* § 1.767(a)(8)(i), 63.18(o).

⁸² *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

⁸³ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

⁸⁴ *Id.* § 63.18(q)(1)(i).

⁸⁵ *Id.* § 63.18(q)(1)(ii).

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;⁸⁶
- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;⁸⁷ and
- Acknowledge that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q), or in the grant of an application or authorization, and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.⁸⁸

5. Certification Regarding Foreign Carrier Status and Foreign Affiliations⁸⁹

SETAR certifies that it (A) is a foreign carrier in Aruba; (B) owns and controls a CLS in Aruba; (C) it is affiliated with T.A. Resources N.V. (“T.A. Resources”), which is authorized to provide telecommunications services to the public in Aruba and the United States; and (D) other

⁸⁶ *Id.* § 63.18(q)(1)(iv)(B).

⁸⁷ *Id.* § 63.18(q)(v).

⁸⁸ *Id.* § 63.18(q)(iv)(A).

⁸⁹ *Id.* § 1.767(a)(8)(ii).

than its affiliation with T.A. Resources, it is not affiliated with foreign carriers, including foreign carriers that own or control CLSs in any foreign destination country where the CELIA system will land.

6. Certification Regarding Foreign Destination Countries⁹⁰

SETAR certifies that: (A) it is a foreign carrier in Aruba, one of the six foreign destination countries in which the Applicants seek to land and operate the CELIA system; (B) it controls T.A. Resources, a foreign carrier in Aruba; (C) no entity owning more than 25 percent of it or controlling it controls foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire; and (D) no grouping of two or more foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire (or parties that control foreign carriers in Martinique, Antigua and Barbuda, Saint-Barthélemy, Aruba, Curaçao, or Bonaire) own, in aggregate, more than 25 percent of it 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 on the CELIA system in the United States.

7. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries⁹¹

SETAR is a foreign carrier, and controls a CLS in Aruba, which is not yet a WTO member country. By way of background, Aruba is a member country of the Kingdom of the Netherlands with full autonomy in internal affairs obtained in 1986 upon separation from the Netherlands Antilles; however, the Dutch Government is responsible for Aruba's defense and foreign affairs. The Kingdom of the Netherlands has been a member of the WTO since 1994. Since then, Aruba has taken steps to finalize the terms of accession to the WTO.

⁹⁰ 47 C.F.R. § 1.767(a)(8)(iii).

⁹¹ *Id.* § 1.767(a)(8)(iv).

Regardless of its WTO status, the Government of Aruba has taken steps to open its telecommunications market to competition, and Aruba provides effective competitive opportunities to U.S. carriers to compete in the country's market. Moreover, the Commission has repeatedly found that Aruba provides effective competitive opportunities for U.S. licensed companies to own and operate submarine cable facilities and provide telecommunications services involving Aruba.

Specifically, despite SETAR being the incumbent local exchange carrier operating in Aruba, a country that is not yet a member of the WTO, in 2011 the Commission granted SETAR's subsidiary, TA Resources, an international Section 214 authority to provide international telecommunications services in the United States.⁹² Subsequently, in 2014, the Commission granted SETAR a joint interest in a cable landing license for the Pacific Caribbean Cable System ("PCCS").⁹³

In the Commission's order granting a submarine cable license for PCCS, the Commission stated that Aruba satisfied the criteria of the effective competitive opportunities for U.S. carriers in the foreign country (the "ECO test"),⁹⁴ which the Commission used at the time to ascertain

⁹² See *T.A. Renounces N.V. Application for International Section 214 Authorization and Determination that Aruba Provides Effective Competitive Opportunities to U.S. Carriers*, Order and Authorization, 26 FCC Rcd. 15,978(Int'l Bur.2011).

⁹³ See *Telefonica International Wholesale Services USA, Inc., et al. Joint Application for a License to Construct, Land, and Operate an Undersea Cable System Linking the British Virgin Islands, Puerto Rico, Aruba, Colombia, Panama, Ecuador and the Continental United States, and Request for a Determination that Aruba Provides Effective Competitive Opportunities to U.S. Cable Landing License*, Order and Authorization, 29 FCC Rcd. 496 (Int'l Bur. 2014) ("PCCS License").

⁹⁴ See *Market Entry and Regulation of Foreign-Affiliated Entities*, Report and Order, 11 FCC Rcd. 3873, 3884-88 ¶¶ 27-39 (1995) ("Foreign Carrier Entry Order"). In 1997, the Commission eliminated the ECO test for entry by applicants from WTO member countries but retained it for entry by applicants having market power in non-WTO Member countries. *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, Report

whether foreign carriers could enter the U.S. market if they were from non-WTO member countries.⁹⁵ First, the Commission found that there were no legal impediments to the ability of U.S.-licensed companies to hold ownership interests in submarine cables landing in Aruba and to land a cable and operate a CLS in Aruba, as U.S. submarine cable operators must follow the same process as SETAR in obtaining authorizations to land and operate a cable.⁹⁶ Second, the Commission found Aruba afforded U.S. submarine cable operators the practical ability to enter the market and own and operate submarine cable facilities.⁹⁷

By its signature below, SETAR certifies to the Commission that the competitive conditions in the Aruba telecommunications market have not materially changed since the grant of T.A. Resources' international Section 214 authorization in 2011 and the grant to SETAR of a joint interest in the PCCS cable landing license in 2014. The Aruba submarine cable market continues to be competitive. Therefore, as the Commission has previously determined that Aruba is a competitive market and the competitive conditions in the country have not changed, grant of the instant application for a communications cable connecting the United States to Aruba is in the public interest and will not negatively impact competition.

As SETAR has a 50-percent-or-greater market share in the international-transport and local access markets in Aruba, it agrees to comply with the reporting requirements specified in 47 C.F.R. § 1.767(l).

and Order and Order on Reconsideration, 12 FCC Rcd. 23,891, 23,896 ¶ 9 (1997). The Commission subsequently eliminated the ECO test, finding that it is no longer necessary to protect competition. *See Reform of Rules and Policies on Foreign Carrier Entry into the U.S. Telecommunications Market*, Report and Order, 29 FCC Rcd. 4256 (2014).

⁹⁵ *See PCCS License* ¶¶ 14-21.

⁹⁶ *See id.* ¶ 17.

⁹⁷ *See id.* ¶ 21.

8. Certification Regarding Routine Conditions⁹⁸

SETAR certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

9. Streamlining⁹⁹

As Aruba is not yet a WTO member country, SETAR does not qualify for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3).

SETAR certifies that the application qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and 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). Florida—the only state in which the CELIA system will land—does not list a cable landing license as a federal activity requiring a consistency certification.¹⁰⁰

[Signature on following page]

⁹⁸ *Id.* § 1.767(a)(9).

⁹⁹ *Id.* § 1.767(k).

¹⁰⁰ *See* Florida's Federal Listed Actions,
<https://coast.noaa.gov/data/czm/consistency/media/fl.pdf>.

Respectfully submitted,

**SERVICIO DI TELECOMUNICACION DI
ARUBA (SETAR) N.V.**

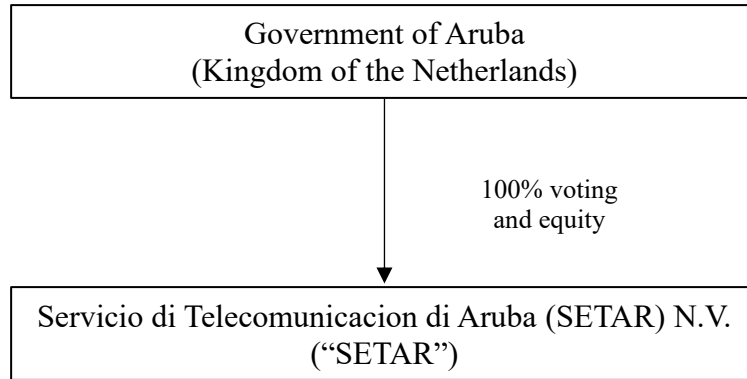
Signed by:
Sonia Damian
B1143CF6F977497...

Sonia Damian
Manager Human Resources
Servicio di Telecomunicacion di Aruba
(SETAR) N.V.
Seroe Blanco 29A
Oranjestad, Aruba

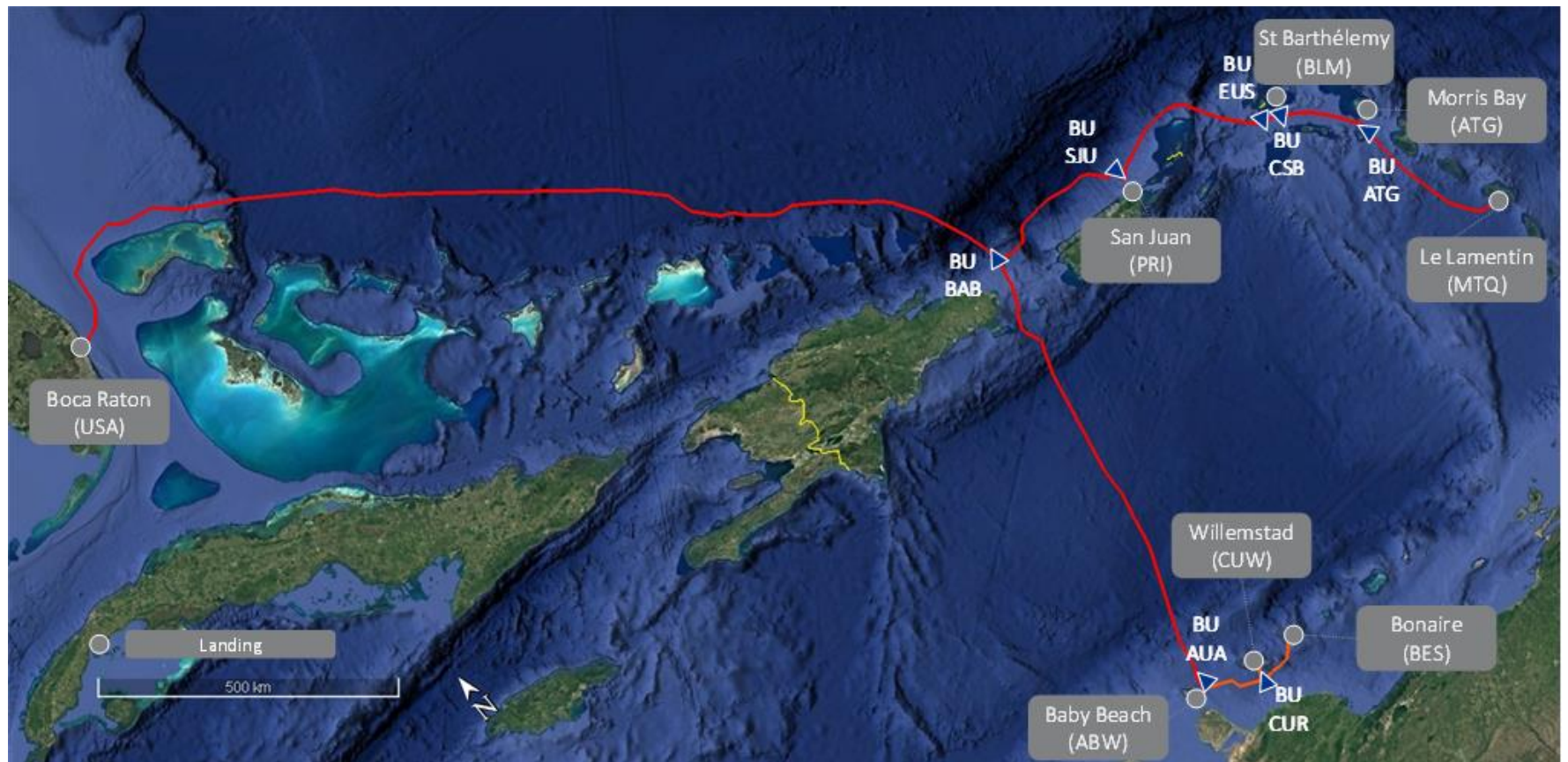
July 29, 2025

EXHIBIT D-1:

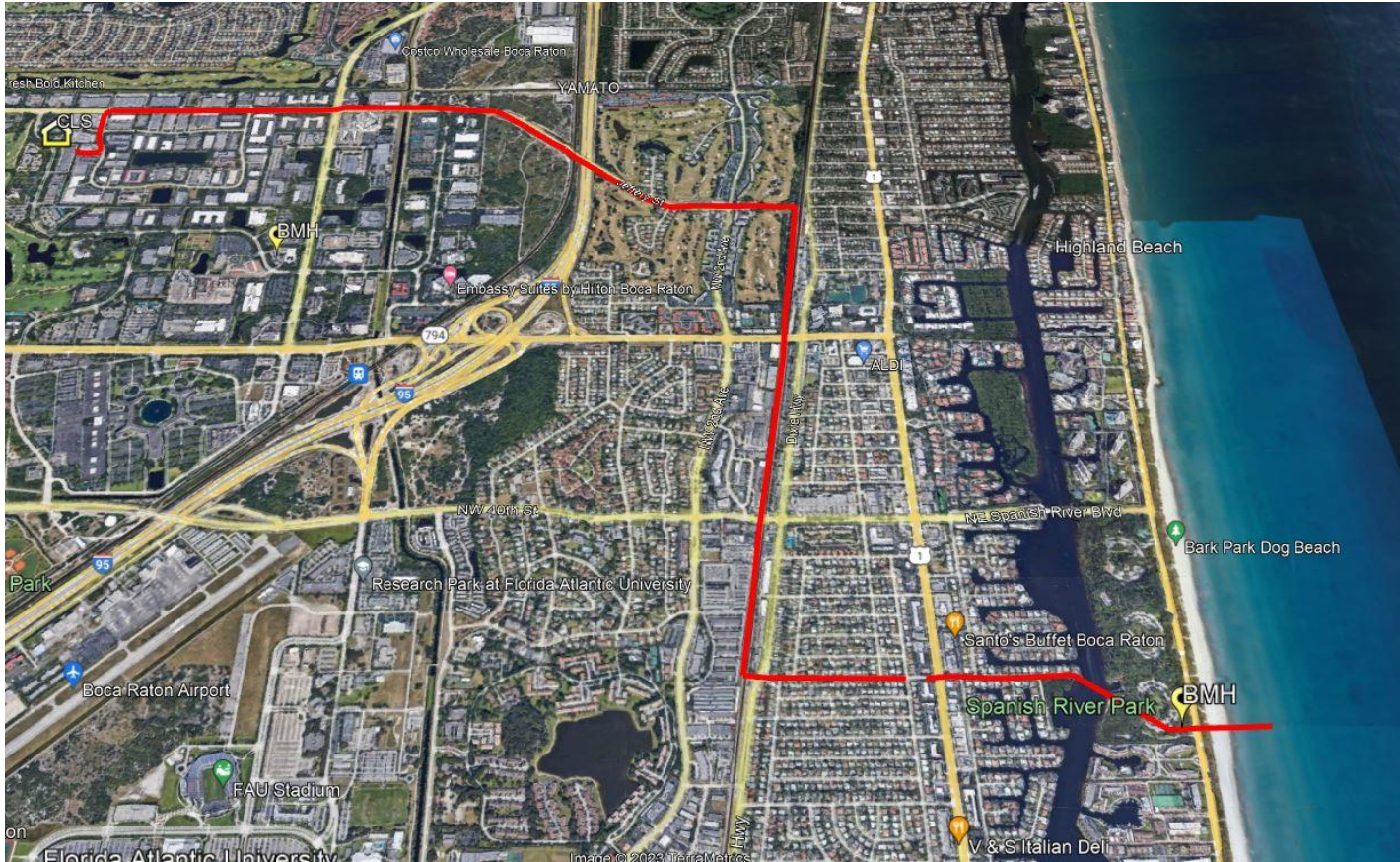
**Ownership Structure of
Servicio di Telecomunicacion di Aruba (SETAR) N.V.**



APPENDIX E:
CELIA SYSTEM ROUTE MAP



APPENDIX F:
BOCA RATON, FLORIDA LANDING POINT INFORMATION



BMH Coordinates	26° 22' 39.817"N 80° 4' 7.524"W
CLS Coordinates	26° 24' 20.39"N 80° 6' 51.22"W
CLS Street Address	6503 West Rogers Circle, Boca Raton, Florida 33487-2706

APPENDIX G:

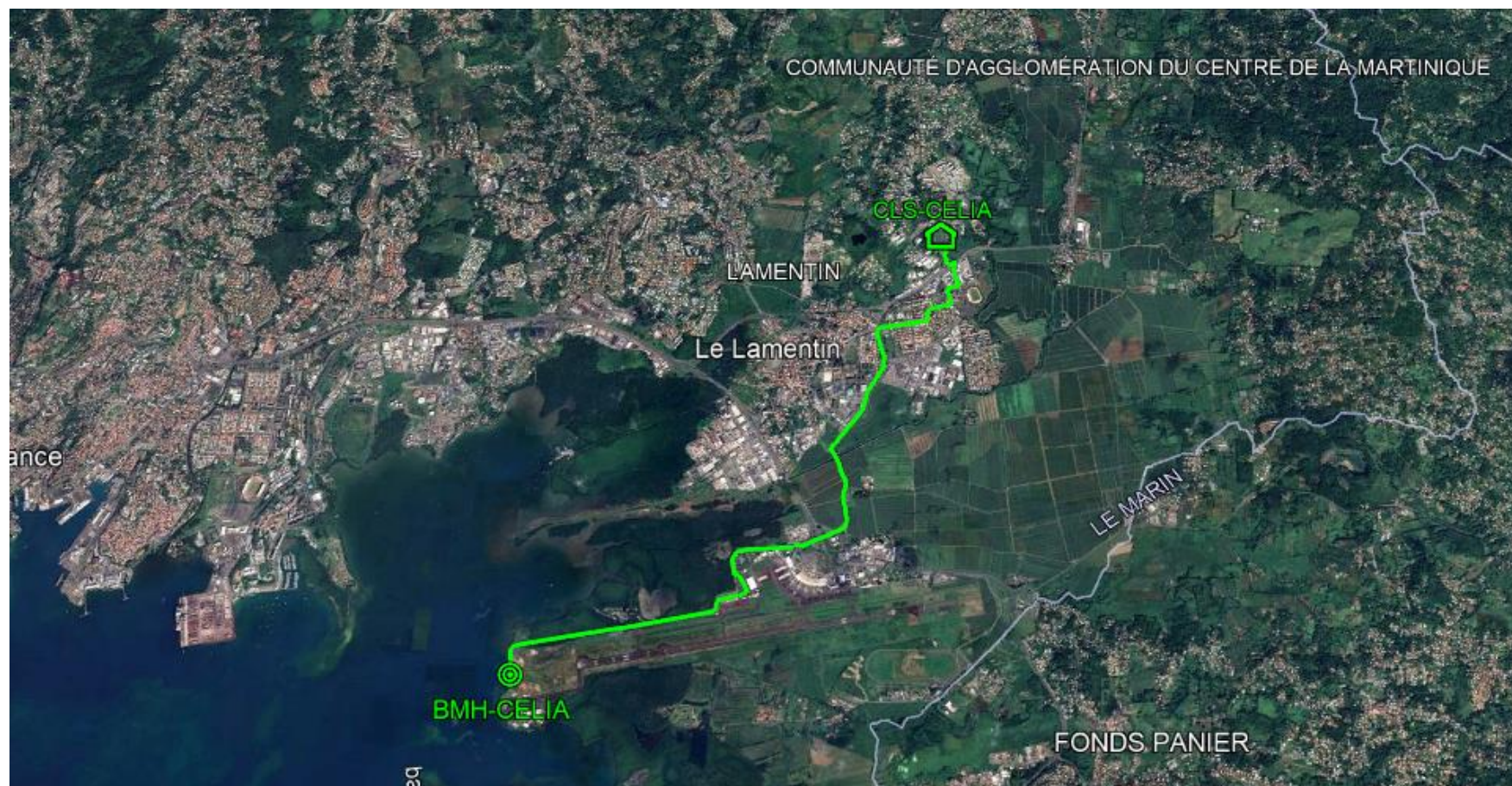
SAN JUAN, PUERTO RICO LANDING POINT INFORMATION



BMH Coordinates	18°26'36.80"N 66° 1'16.92"W
CLS Coordinates	18°27'4.93"N 66° 2'27.75"W
CLS Street Address	2423 Calle Loiza, Santurce, P.R. 00913

APPENDIX H:

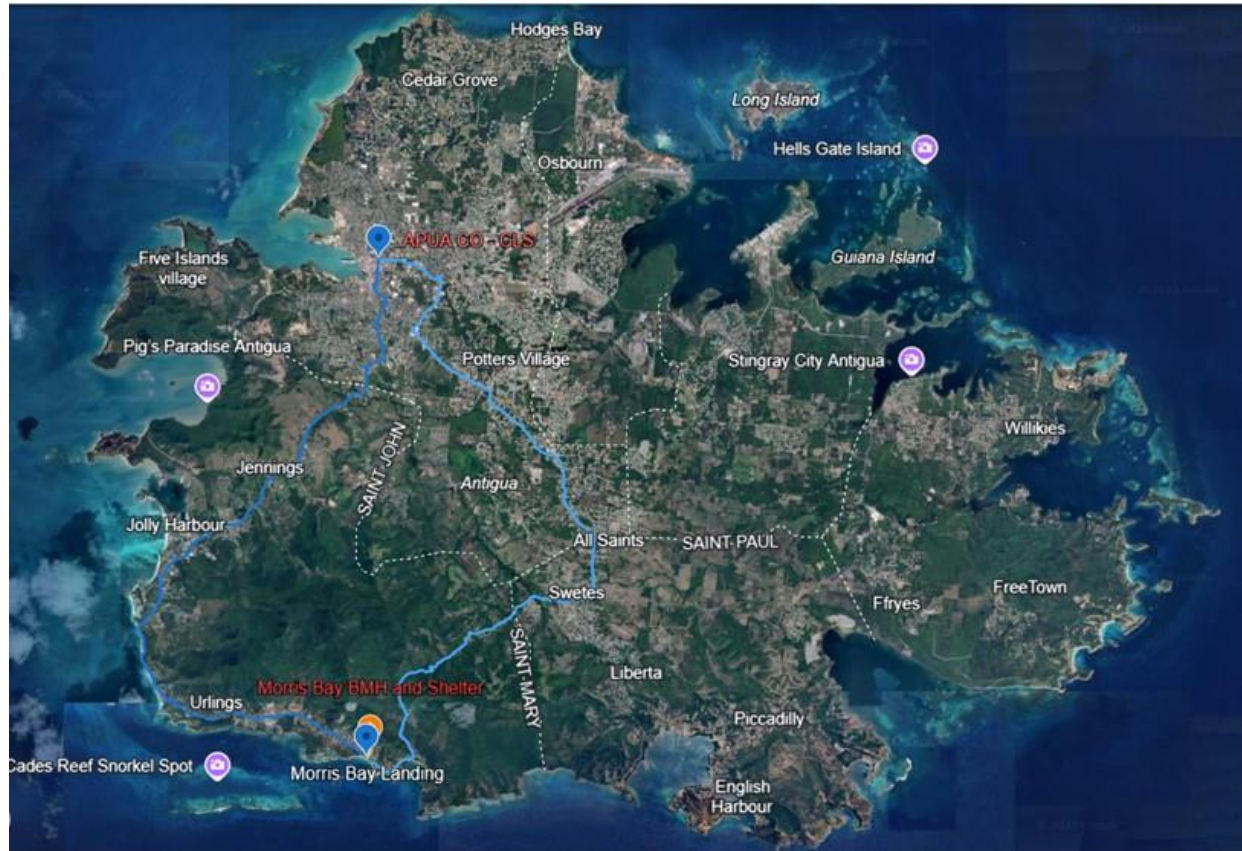
LE LAMENTIN, MARTINIQUE LANDING POINT INFORMATION



BMH Coordinates	14° 35.225'N 61° 1.406'W
CLS Coordinates	14° 37.478'N 60° 59.391'W
CLS Street Address	Route de Vert Pré, Le Lamentin, Martinique, France

APPENDIX I:

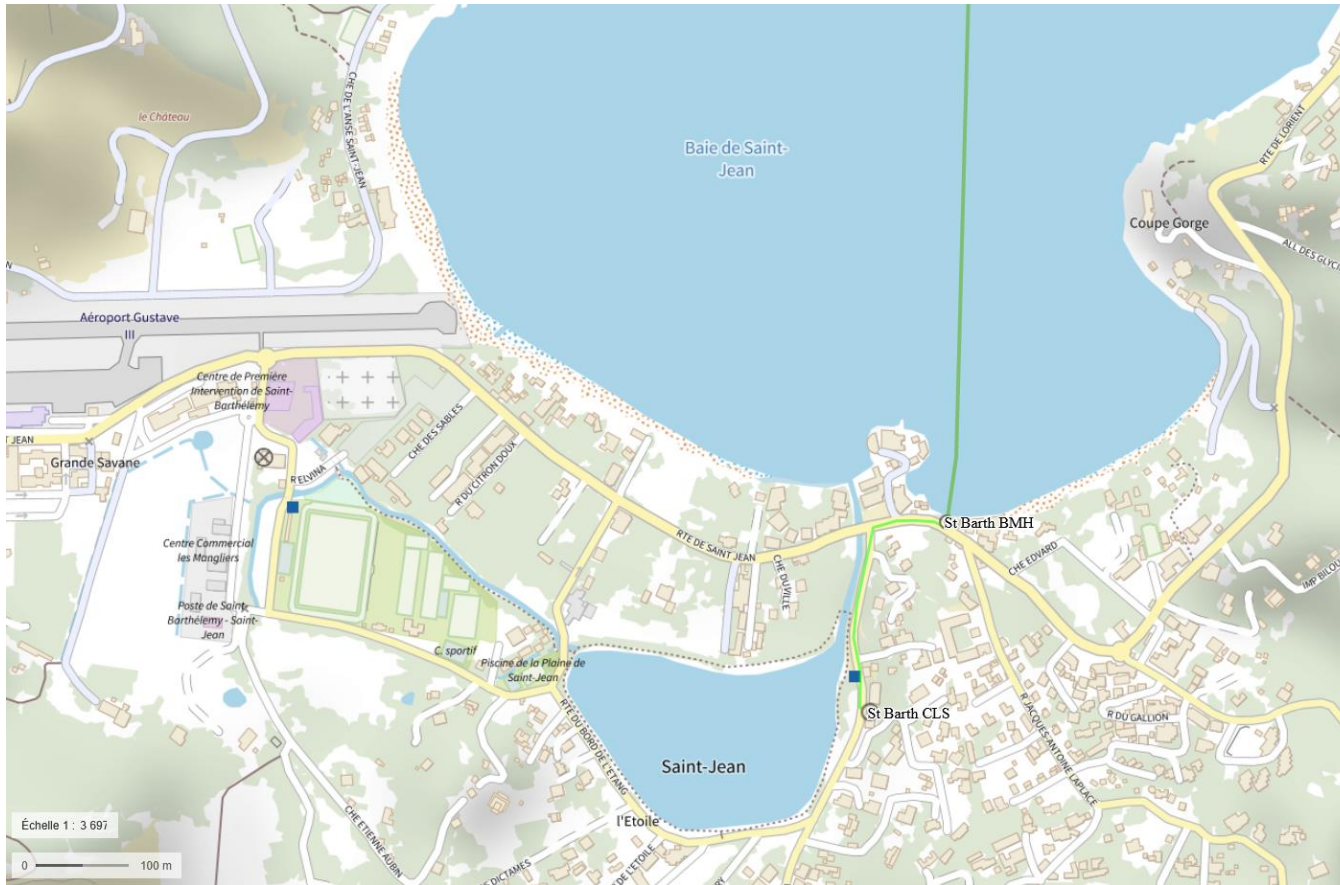
MORRIS BAY, ANTIGUA LANDING POINT INFORMATION



BMH Coordinates	17°01'07"N 61°50'37"W
Equipment Shelter Coordinates	17°01'07"N 61°50'37"W
CLS Coordinates	17°07'18"N 61°50'30"W
CLS Street Address	Long Street, St. John's, Antigua

APPENDIX J:

SAINT JEAN BAY, SAINT-BARTHÉLEMY LANDING POINT INFORMATION



BMH Coordinates	17.902503°N 62.835503W
CLS Coordinates	17.900655°N 62.836280°W
CLS Street Address	1078, Route de Carénage, Saint-Jean, 97133 Saint-Barthélemy

APPENDIX K:

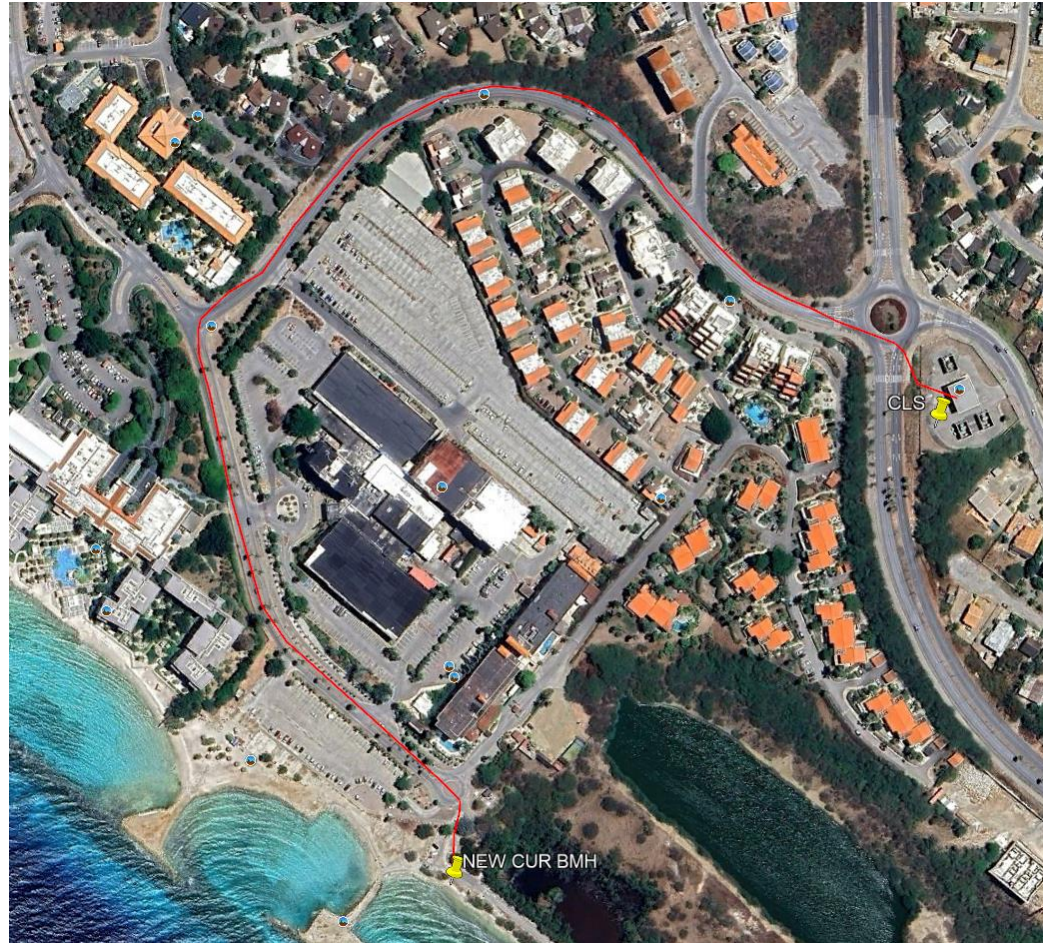
BABY BEACH, ARUBA LANDING POINT INFORMATION



BMH Coordinates	12°24'48.62"N 69°53'0.785"W
CLS Coordinates	12°26'10.738"N 69°54'39.912"W
CLS Street Address	Bernardstraat 123, Baby Beach, Aruba

APPENDIX L:

WILLEMSTAD, CURAÇAO LANDING POINT INFORMATION



BMH Coordinates	N 12° 6'58.60152", W 68° 57'50.98896"
CLS Coordinates	N 12° 7'8.1102", W 68° 57'40.88088"
CLS Street Address	Piscaderaweg, Willemstad, Curaçao

APPENDIX M:

KRALENDIJK, BONAIRE LANDING POINT INFORMATION



BMH Coordinates	12° 6.745' N 68° 17.649' W
CLS Coordinates	12° 9.020' N 68° 16.536' W
CLS Street Address	Playa Bon, Kralendijk, Bonaire

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 CELIA submarine cable system, by hand delivery or electronic mail this 30th day of July, 2025 to the following:

Alka Patel
Director, Technology and Security Policy
International Communications and Information Policy
Bureau of Cyberspace and Digital Policy
U.S. DEPARTMENT OF STATE
CDP/ICP/TS : Room 1808
2201 C Street, N.W.
Washington, D.C. 20520-1808

Andrew J. Coley
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Lia Wentworth
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Kent Bressie