

Cirion Technologies Solutions, LLC (“Cirion”) is requesting a waiver of section 1.767(h) of the Commission's rules, where entities are required to be applicants for, and licensees on, a cable landing license include: (i) entities that own or control a cable landing station in the United States; and (ii) entities that own or control a five percent (5%) or greater interest in the submarine cable system and use the U.S. points of that system. Through this waiver request, Cirion is requesting a waiver for PC Landing Corp., the owner of the Grover Beach Landing Station, to be exempt as PC Landing Corp. will not have any independent control to affect the operation of Pan American Crossing submarine cable system (“PAC”).

The Grover Beach cable landing station is owned by PC Landing Corp., a subsidiary of Pacific Crossing Ltd, which in turn is owned by NTT Communications. PC Landing Corp. does not own, control, or hold any direct or indirect ownership interest in the PAC. Rather, PC Landing Corp’s involvement with the PAC is limited to a contractual arrangement with Cirion Technologies Solutions, LLC, and any rights exercised by PC Landing Corp. with respect to the PAC are subject to direction, discretion, and supervision of Cirion. The PAC is owned and controlled by Cirion, and PC Landing Corp. does not hold any equity interest, voting rights, management rights, governance rights, or any other rights or interests evidencing ownership or control of the cable system.

Accordingly, PC landing Corp. does not qualify as an applicant under Section 1.767(h), as neither owns nor controls any interest in the PAC submarine cable system. Cirion retains full physical and logical control over the PAC cable system.