

Cirion Technologies Solutions, LLC (“Cirion”) is requesting a 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 Cirion St. Croix, Inc. (“Cirion St. Croix”) as the entity does not have any independent control to affect the operation of South American Cross submarine cable system (“SAC”).

The cable landing station located in the U.S. Virgin Islands (USVI) is licensed in the name of Cirion St. Croix; however, it is fully managed and controlled by Cirion, as Cirion St. Croix is a wholly owned subsidiary of Cirion. As a subsidiary, Cirion St. Croix does not operate as an independent entity responsible for managing the cable landing station. Rather, Cirion maintains full physical and logical control over both the cable landing station and the sAC cable system. All operational and management decisions relating to the cable landing station in the USVI are made by Cirion.

Accordingly, Cirion St. Croix does not qualify as an applicant under Section 1.767(h), as it does not own nor control any interest in the SAC submarine cable system. Since Cirion St. Croix is a subsidiary of Cirion, Cirion retains full physical and logical control over the SAC cable system and the cable landing station.