

(a) Ownership Information

a. Information requested by Section 63.18(h):

Cirion Technologies Solutions, LLC ("Cirion") is indirectly owned by investment entities affiliated with Stonepeak and AustralianSuper through a multi-tiered holding structure.

Stonepeak completed the acquisition of the business in August 2022, and AustralianSuper invested alongside Stonepeak in the transaction. Entities affiliated with Stonepeak are referred to herein as the "Stonepeak Entities," and entities affiliated with AustralianSuper are referred to herein as the "AustralianSuper Entities."

The following entities hold, directly or indirectly, a 10 percent or greater equity or voting interest in Cirion:

Table 1: Ownership Information

Name:	Patagonia Holdco LLC ("Patagonia Holdco") (<i>Reference "A" in Attachment A</i>), a holding entity of Cirion
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	Holding company
Interest Held:	Patagonia Holdco holds a direct 100% equity and voting interest in CTS.

Name:	Patagonia Intermediate Holdco LLC ("Patagonia Intermediate") (<i>Reference "B" in Attachment A</i>), a holding entity of Cirion
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	Holding company
Interest Held:	Patagonia Intermediate holds a direct 100% equity and voting interest in Patagonia Holdco.

Name:	Stonepeak Patagonia Holdings LLC ("SP Holdings") (<i>Reference "C" in Attachment A</i>), a holding entity of Cirion
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Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	SP Holdings holds a direct 100% equity and voting interest in Patagonia Intermediate.

Name:	Stonepeak Patagonia Intermediate Holdings LP (“SP Intermediate Holdings”), a part of the Stonepeak Entities (Reference “D” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	SP Intermediate Holdings holds approximately a direct 70% equity and 70% voting interest in SP Holdings.

Name:	Stonepeak Patagonia Upper Holdings LP (“SP Upper Holdings”), a part of the Stonepeak Entities (Reference “E” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	SP Upper Holdings holds a direct 100% equity and 0% voting interest in SP Intermediate Holdings.

Name:	Stonepeak Infrastructure Fund IV (AIV V) LP (“SP Infrastructure IV”), a part of the Stonepeak Entities (Reference “F” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	SP Infrastructure IV holds a direct 34.83% equity and 0% voting interest in SP Upper Holdings.

Name:	Stonepeak Infrastructure Fund IV (Lux) (AIV VIII) SCSp (“SP Infrastructure (Lux)”), a part of the Stonepeak Entities (Reference “G” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Luxembourg

Type of Organization:	Special limited partnership
Principal Business:	Investments
Interest Held:	SP Infrastructure (Lux) holds a direct 4.30% equity and 0% voting interest in SP Upper Holdings.

Name:	Stonepeak Patagonia (Co-Invest) Holdings LP (“SP (Co-Invest) Holdings”), a part of the Stonepeak Entities (Reference “H” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	SP (Co-Invest) Holdings holds a direct 38.96% equity interest and 0% voting interest in SP Upper Holdings.

Name:	Stonepeak Infrastructure Fund-W (Side Car) (AIV II) LP (“Fund-W”) , a part of the Stonepeak Entities (Reference “I” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	Fund-W holds a direct 1.81% equity interest and 0% voting interest in SP Upper Holdings.

Name:	Stonepeak Infrastructure Fund Super Co-Invest (AIV II) LP (“Super Co-Invest”), a part of the Stonepeak Entities (Reference “J” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	Super Co-Invest holds a direct 15.53% equity interest and 0% voting interest in SP Upper Holdings.

Name:	Stonepeak Super Associates LLC, a part of the Stonepeak Entities (Reference “K” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	General Partner

Interest Held:	Stonepeak Super Associates LLC holds a direct 100% voting interest and 0% equity interest in Super Co-Invest.
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Name:	Stonepeak Associates-W LLC, a part of the Stonepeak Entities (Reference “L” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	General Partner
Interest Held:	Stonepeak Associates-W LLC holds a direct 100% voting interest and 1% equity interest in Fund-W.

Name:	Stonepeak Associates IV LLC (“Associates IV”), a part of the Stonepeak Entities (Reference “M” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	Associates IV holds a direct 0% equity and 100% voting interest in SP Intermediate Holdings, a 0% equity and 100% voting interest in SP Upper Holdings, a 100% voting and 1.5% equity interest in SP Infrastructure IV and SP Infrastructure (Lux), a 0% equity interest and 100% voting interest in Stonepeak Super Associates LLC, and a 100% voting interest and 100% equity interest in Stonepeak Associates-W LLC.

Name:	Stonepeak GP Investors IV LLC, a part of the Stonepeak Entities (Reference “N” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	Stonepeak GP Investors IV LLC holds a direct 100% voting interest in Associates IV.

Name:	Stonepeak GP Investors Holdings LP, a part of the Stonepeak Entities (Reference “O” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments

Interest Held:	Stonepeak GP Investors Holdings LP is the sole member of Stonepeak GP Investors IV LLC.
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Name:	Stonepeak GP Investors Upper Holdings LP, a part of the Stonepeak Entities (Reference “P” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited partnership
Principal Business:	Investments
Interest Held:	Stonepeak GP Investors Upper Holdings LP is the general partner of Stonepeak GP Investors Holdings LP.

Name:	Stonepeak GP Investors Holdings Manager LLC, a part of the Stonepeak Entities (Reference “Q” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Delaware
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	Stonepeak GP Investors Holdings Manager LLC is the general partner of Stonepeak GP Investors Upper Holdings LP.

Name:	Stonepeak Associates IV (Lux) S.à.r.l. (“SP Associates IV (Lux)”) a part of the Stonepeak Entities (Reference “R” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Luxembourg
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	SP Associates IV (Lux) holds a 100% voting interest in SP Infrastructure (Lux) as its managing general partner but does not have any indirect voting interest in Patagonia Holdco.

Name:	Stonepeak GP Investors IV (Cayman) LLC (“Stonepeak GP (Cayman)”), a part of the Stonepeak Entities (Reference “S” in Attachment A)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Cayman Islands
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	Stonepeak GP (Cayman) holds a 100% voting interest in SP Associates IV (Lux) as its sole shareholder but does not have any indirect voting interest in Patagonia Holdco.

Name:	Stonepeak GP Investors Manager (Cayman) LLC (“Stonepeak GP Investors (Cayman)”) , a part of the Stonepeak Entities (<i>Reference “T” in Attachment A</i>)
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Place of Organization:	Cayman Islands
Type of Organization:	Limited liability company
Principal Business:	Investments
Interest Held:	Stonepeak GP Investors (Cayman) is the managing member of Stonepeak GP (Cayman) and holds a 100% voting interest in Stonepeak GP (Cayman) as its managing member but does not have any indirect voting interest in Patagonia Holdco.

Name:	Michael Dorrell (<i>Reference “U” in Attachment A</i>) , founder of the Stonepeak Entities.
Address:	55 Hudson Yards, 550 W 34th Street, 48th Floor, New York, NY 10001
Citizenship:	United States and Australia (dual citizenship)
Type of Person:	Individual
Principal Business:	Founder of Stonepeak
Interest Held:	Mr. Dorrell holds a direct 100% voting interest in Stonepeak GP Investors Holdings Manager LLC and Stonepeak GP Investors (Cayman).

Name:	AustralianSuper Investments Pty Ltd (Australian Proprietary Company) (<i>Reference “W” in Attachment A</i>) as trustee for AustralianSuper Investments Fund No. 2 (Australian Trust) (“AusSuper Fund No. 2”) (<i>Reference “V” in Attachment A</i>) , part of the AustralianSuper Entities.
Address:	Level 30, 130 Lonsdale Street Melbourne VIC 3000 Australia
Place of Organization:	Australia
Type of Organization:	Trust
Principal Business:	Investment trust
Interest Held:	AusSuper Fund No. 2 holds an approximate 30% equity and 30% voting interest as a member of SP Holdings.

Name:	AustralianSuper Pty Ltd (<i>Reference “X” in Attachment A</i>) as trustee for AustralianSuper (Australian Trust) (“AusSuper”) (<i>Reference “Y” in Attachment A</i>) , part of the AustralianSuper Entities.
Address:	Level 30, 130 Lonsdale Street Melbourne VIC 3000 Australia
Place of Organization:	Australia
Type of Organization:	Public offer superannuation (pension) fund
Principal Business:	Public offer superannuation (pension) fund

Interest Held:	AusSuper holds a 100% ownership interest in AusSuper Fund No. 2 and approximate indirect 30% equity and 0% voting interest in Patagonia Holdco.
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Other than the interest holders identified above, no other entity or individual holds a 10 percent or greater direct or indirect equity or voting interest in Cirion .¹

(b) An organizational chart depicting the ownership structure of Cirion is provided as Attachment A.

(c) Interlocking directorates with a foreign carrier.

a. Cirion's interlocking officers and directors, as required by Section 63.18(h) of the Commission's Rules, are set forth in Attachment B.

(d) ***Section 63.18(o): Anti-Drug Abuse Certification Information requested by Section 63.18(o):***

a. Cirion certifies pursuant to sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(e) **Certification Regarding Foreign Carrier Status and Foreign Affiliation**

Cirion is affiliated with the following foreign carrier affiliates, including those owning or controlling a submarine cable landing station in the foreign country. The foreign carrier affiliates listed below operate within the following World Trade Organization ("WTO") member countries:

¹ In addition, Stonepeak Patagonia (Co-Invest) Holdings III LP, a Delaware limited partnership ("Stonepeak Co-Invest III") and a limited partner of Stonepeak Patagonia Upper Holdings LP ("Upper Holdings"), holds a less than 10% indirect equity interest in Cirion Technologies Solutions, LLC. Currently holds 4.39% ownership interest.

Argentina, Brazil, Chile, Perú, Ecuador, Colombia, Venezuela, Mexico, Panamá and Costa Rica and none operate in a country that is not a member of the WTO. Please see Attachment B.

Through its investor Stonepeak, Cirion is affiliated with the following foreign carrier affiliates, including those owning or controlling a submarine cable landing station in the foreign country. The foreign carrier affiliates listed below operate within the following World Trade Organization (“WTO”) member countries: Canada, Austria, Czech Republic, Germany, Poland, Slovakia, Belgium, Denmark, Finland, Indonesia, Italy, Norway, Sweden, United Kingdom, France, Netherlands, Singapore, South Korea, Switzerland, Ireland, and Spain, and none operate in a country that is not a member of the WTO. Please see Attachment C.

Cirion certifies that all of the countries listed in Attachment C are members of the WTO and that the foreign carrier affiliates, individually and collectively, do not have market power in any of the foreign countries in which they provide service. The foreign carrier affiliates individually and collectively hold less than a 50 percent market share in the international transport and the local access markets in each of these countries.

(f) Certification Regarding Foreign Destination Markets

- a. Cirion certifies that, with respect to the Pan-American Crossing Cable System (“PAC”), it does not seek to land and operate a submarine cable connecting the United States to any country for which any of the following is true:
 - i. The applicant is a foreign carrier in that country; or
 - ii. The applicant controls a foreign carrier in that country; or
 - iii. There exists any entity that owns more than 25 percent of the applicant, or controls the applicant, or controls a foreign carrier in that country.

- iv. Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the cable in the United States;

(g) Certifications Regarding WTO Status and Affiliates with Foreign Carriers Having Market Power in Foreign Destination Markets

- a. Not applicable.

(h) Information Requested by 47 C.F.R. § 63.18(p) (Certifications)

- a. Law Enforcement Certifications
 - i. Cirion will comply with all applicable Communications Assistance for Law Enforcement Act (CALEA) requirements and related rules and regulations, including any and all FCC orders and opinions governing the application of CALEA, pursuant to the Communications Assistance for Law Enforcement Act and the Commission's rules and regulations in part 1, subpart Z, of this chapter;
 - ii. Cirion will make communications to, from, or within the United States, as well as records thereof, available 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:
 - 1. The Wiretap Act, 18 U.S.C. 2510 et seq.;
 - 2. The Stored Communications Act, 18 U.S.C. 2701 et seq.;

3. The Pen Register and Trap and Trace Statute, 18 U.S.C. 3121 et seq.; and
 4. Other court orders, subpoenas or other legal process;
- iii. Cirion designates Stephanie Mendy as its point of contact for the execution of lawful requests and as an agent for legal service of process. Ms. Mendy is located in the United States and is a U.S. citizen. Her address and contact information are set forth above in the Cirion response to 1.767(a)(3).
 - iv. Cirion will be responsible for 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 the Committee's request, as required in § 1.65(a) of this chapter, and that it agrees to inform the Commission and the Committee of any substantial and significant changes while the application is pending; and
 - v. After the application is no longer pending for purposes of § 1.65 of the Commission's rules, it will notify the Commission and the Committee of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days; and
 - vi. Cirion understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out above in response to subparagraph (p) or in the grant of an application or authorization

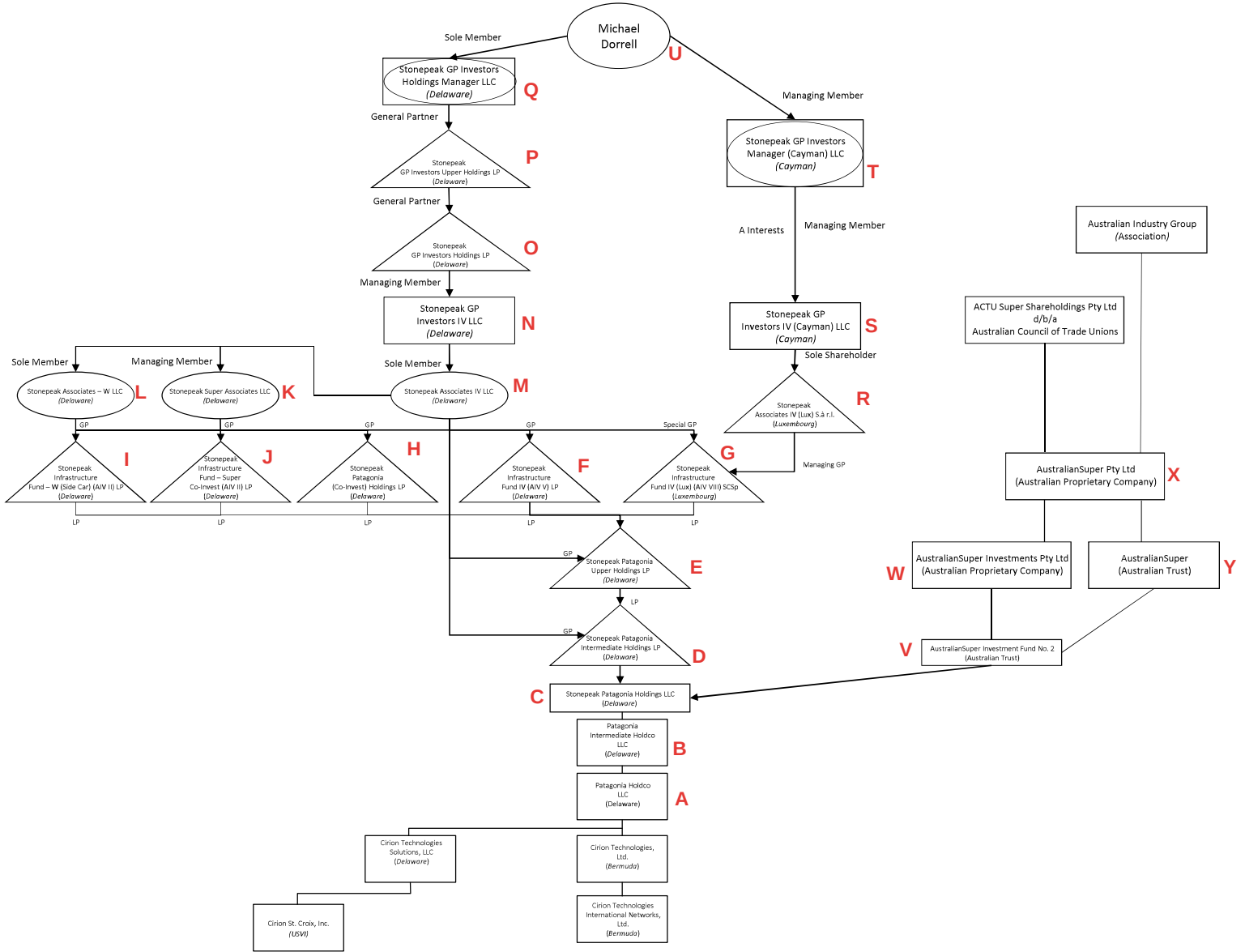
and/or that if the information provided to the United States Government is materially false, fictitious, or fraudulent, it may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. 1001.

(i) Routine Conditions Certification

Cirion hereby acknowledges and agrees that it will comply with and abide by all applicable routine conditions set forth in 47 C.F.R. § 1.70007, as amended, including any conditions imposed by the Federal Communications Commission in connection with the authorization. Cirion further commits to conducting its operations in accordance with all applicable FCC rules, regulations, and requirements governing cable landing licensees. Cirion hereby agrees and accepts to abide by routine conditions of where a new section is location.

Cirion will remain in compliance with the commitments made in the Letter of Agreement ("LOA") dated April 22, 2022, and will continue to adhere to all obligations contained therein. Cirion requests that the Commission, in granting the renewal of the PAC cable landing license, continue to condition the license on compliance with the LOA.

ATTACHMENT A



ATTACHMENT B

<i>Director or Officer</i>	<i>Role with CTS</i>	<i>Role with Foreign Carrier</i>
Santiago Londono Ramirez	Director	Director – Cirion Technologies Chile S.A. (Chile) Director – Cirion Technologies Colombia S.A.S. (Colombia) Financial Manager – Cirion Technologies Costa Rica S.R.L. (Costa Rica) Executive President – Cirion Technologies Ecuador S.A. (Ecuador) Treasurer – Cirion Technologies Mexico, S. de R.L. (Mexico) Treasurer – Cirion Technologies Mexico II, S. de R.L. (Mexico) Director, Treasurer – Cirion Technologies Panamá Inc. (Panama) Director – Cirion Technologies Peru S.A. (Peru) Director – Cirion Technologies S.A. (Venezuela)
Valeria I. Plastino	Director	Director – Cirion Technologies Chile S.A. (Chile) Alternate Director – Cirion Technologies Colombia S.A.S. (Colombia) Legal Manager – Cirion Technologies Costa Rica S.R.L. (Costa Rica) Vice President – Cirion Technologies Ecuador S.A. (Ecuador) Member – Cirion Technologies Mexico, S. de R.L. (Mexico) Member – Cirion Technologies Mexico II, S. de R.L. (Mexico) Director, Vice President & Secretary – Cirion Technologies Panamá Inc. (Panama) Director – Cirion Technologies Peru S.A. (Peru)
Andrew Thomas	Director	Director – Xplore Inc. (Canada)

ATTACHMENT C

Foreign Carrier Affiliate	Countries	CLS
Xplore Inc.	Canada	N
euNetworks GmbH	Austria, Czech Republic, Germany, Poland, Slovakia	N
euNetworks BVBA	Belgium	N
euNetworks Fiber UK Ltd	Denmark, Finland, Norway, Sweden, United Kingdom	Y (Southport, Lancashire England & Lowestoft, England)
euNetworks SAS	France	N
euNetworks S.r.l	Italy	N
euNetworks BV	Netherlands	Y (Ijmuiden, Netherlands)
euNetworks AG	Switzerland	N
euNetworks Ireland-Private Fiber Limited	Ireland	Y (Dublin, Ireland)
euNetworks Fiber SL	Spain	N
Digital Edge (Korea) Yuhan Hosea	South Korea	N ²
PT Indointernet Tbk	Indonesia	N ³
PT Net Soft	Indonesia	N ⁴
Digital Edge (Japan) G.K.	Japan	N ⁵
Beijing Huahai Yunlian Technology Co. Ltd.	China	N ⁶

² Cirion Technologies Solutions, LLC notes that, while Digital Edge (Korea) Yuhan Hosea does not possess a cable landing station or land any cables, it owns a building in Busan, South Korea in which such cables are landed and provides colocation services to authorized telecommunications companies who have secured a landing license to land, own and operate a facilities-based telecommunications network in Korea.

³ PT Indointernet Tbk holds an ISP and Closed Fixed Network licenses (a regulated telecommunication service under Indonesian law). No cable landing stations.

⁴ PT Net Soft holds a NAP license (a regulated telecommunication service under Indonesian law). No cable landing stations.

⁵ Digital Edge (Japan) G.K. has a regulated status under the Telecommunication Business Act" in Japan. It is a "telecommunication business provider with notification status". But no cable landing stations owned or leased.

⁶ Beijing Huahai Yunlian Technology Co. Ltd. utilises a Value-Added Telecommunications Service (VATS) license issued by Ministry of Industry and Information Technology (MIIT) in China that is registered in the name of an affiliated entity, Chuanjun Information Technology (Shanghai) Co., Ltd.). VATS licenses are required for any service that results in provision of internet and data-related services, connectivity, bandwidth and cloud hosting. But no cable landing stations owned or leased.