

Narrative Description of the Cable System.

In accordance with 47 CFR Part 1, Subpart FF, the Cirion hereby amends the Pan-American Crossing Cable System (“PAC”) renewal application, as any application may be amended as a matter of right prior to the date of any final action taken by the Commission or designation for hearing. As contemplated by the Commission's rules governing cable landing license applications and amendments, the Applicants have made the following revisions:

- Removed the confidential version of the detailed ownership diagram;
- Revised the response regarding eligibility for streamlined processing;
- Supplemented the application with additional information supporting exclusion from Executive Branch referral; and
- Submitted an attachment containing the information and certifications required by Section 1.767(a)(8)(ii)-(iv) of the Commission's rules.

The Pan-American Crossing Cable System (“PAC”) is a non-common carrier system, with a length of 10,000 KM, connecting the United States of America, Mexico, Costa Rica, and Panama. Specifically, the landing points are the following: Grover Beach in California, United States of America; Tijuana, Mexico; Mazatlan, Mexico; Esterillos, Costa Rica¹; and Panama City, Panama². The PAC has been operating since March 2000. It currently provides 27.9 Tbps lit capacity and has a design capacity of 49 Tbps.

¹ This landing station is owned by Ufinet. The full location is Esterillos, Parrita Canton, Puntarenas Province, Costa Rica. Esterillos is the local community/locality, Parrita is the canton (the equivalent of a county in Costa Rica), Puntarenas is the province, and Costa Rica is the country.

² The cable landing station is also known as the Fort Amador cable landing station. The full location is Fort Amador, Ancón, Panama City, Panamá Province, Panama. Fort Amador is the locality, Ancón is the administrative subdivision, Panamá Province is the province, and Panama is the country.

Below please find a chart describing the PAC submarine cable system, including the type and number of channels and the capacity thereof.

Route Description/Path	Number of Fiber Pairs	Design Capacity (Gbps)	Lit Capacity (Gbps)	Length (km)
Grover Beach, California – Panama City, Panama ³	1	2200	1400	6202
Grover Beach, California - Tijuana, Mexico	2	22000	7200	959
Tijuana, Mexico - Mazatlan, Mexico	2	12600	11800	2080
Mazatlan, México - Esterillos, Costa Rica	1	3900	3600	3333
Esterillos, Costa Rica – Panama City, Panama ⁴	1	8300	3900	1118

This amendment shall be signed and submitted in the same manner as was the original application.

³ Also known as the Fort Amador cable landing station.

⁴ Also known as the Fort Amador cable landing station.