

Narrative Description of the Mid-Atlantic Crossing Submarine Cable system

In accordance with 47 CFR Part 1, Subpart FF, the Cirion Technologies Solutions, LLC (“Cirion”), hereby amends the Mid-Atlantic Crossing Submarine Cable system (“MAC”) 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:

1. Changed the answer to the question “Is the Applicant seeking streamlined processing?”;
2. Updated question 15 to include data in columns (g) and (h);
3. Updated question 16 to reflect the U.S. and foreign landing geographic coordinates of our cable landing stations and beach manholes;
4. Updated question 23 and 24 to reflect yes;
5. Removed the confidential version of the detailed ownership diagram;
6. Updated the answer to question 17;
7. Revised the response regarding eligibility for streamlined processing;
8. Supplemented the application with additional information supporting exclusion from Executive Branch referral;
9. Submitted an attachment containing the information and certifications required by Section 1.767(a)(8)(ii)-(iv) of the Commission's rules; and
10. Submitted an attachment explaining as to why the renewal application was not filed with the Commission prior to the expiration of the current license.
11. Updated the narrative statement and waiver request.

The MAC submarine cable system is a key component of Cirion’s infrastructure, connecting the United States to Latin America and supporting high-capacity, low-latency data transmission across the region. The MAC cable system was originally licensed by the FCC in 1999 to MAC Landing Corp., with landing points authorized in Brookhaven, New York¹; Hollywood, Florida; and St. Croix in the U.S. Virgin Islands. Since 1999, the names associated with the licensee have changed and the current name of the licensee is Cirion Technologies Solutions, LLC. The system entered commercial service on June 1, 2000. In 2009, the license was assigned in a pro forma transaction to GT Landing II Corp., following a merger with MAC Landing Corp. Two years later, in 2011, GT Landing II Corp.’s parent company, Global Crossing Limited, was acquired by Level 3 Communications, Inc. As part of this restructuring, Global Crossing Telecommunications, Inc. (“GCTI”), a subsidiary of Level 3 Communications, Inc., became the new licensee. In 2016, GCTI was transferred to CenturyLink, making CenturyLink the indirect parent of the licensee. In 2020, CenturyLink rebranded itself as Lumen Technologies. Subsequently, in 2022, the MAC cable landing license was assigned in a pro forma transaction from GCTI to Global Crossing Americas Solutions, LLC (“GCAS”), both subsidiaries of Lumen Technologies, Inc.

In August 2022, Patagonia Holdco, LLC, an entity affiliated with the Stonepeak Entities, acquired Lumen Technologies, Inc.’s Latin American operations, which thereafter began operating as Cirion, an independent portfolio company. Cirion is indirectly owned by investment vehicles affiliated with Stonepeak and AustralianSuper through a multi-tiered holding company structure. AustralianSuper invested alongside Stonepeak in the acquisition. Entities affiliated

¹ The cable landing station is located in Shirley, New York in the Town of Brookhaven. This location is also known as Brookhaven or referred to as Brookhaven Station.

with Stonepeak are referred to herein as the "Stonepeak Entities," and entities affiliated with AustralianSuper are referred to herein as the "AustralianSuper Entities."

The length of the MAC is approximately 7,500 km. It consists of the following segments. The *Brookhaven, New York² to Hollywood, Florida* segment connects from Brookhaven, New York to Hollywood, Florida, covering a distance of approximately 1,800 km. The system has two (2) fiber pairs, a design capacity of 1070 gpbs, and a lit capacity of 1070 gpbs.

The *Hollywood, Florida to St. Croix, United States Virgin Island* segment connects from Brookhaven, New York to St. Croix, United States Virgin Island, covering a distance of approximately 1,600 km. The system has two (2) fiber pairs, a design capacity of 18,000 gpbs, and a lit capacity of 15,800 gpbs.

The *St. Croix, United States Virgin Island to Brookhaven, New York* segment connects from St. Croix, United States Virgin Island to Brookhaven, New York, covering a distance of approximately 4,100 km. The system has two (2) fiber pairs, a design capacity of 13,400 gpbs, and a lit capacity of 9,590 gpbs.

The cable landing station located in Brookhaven, New York, is owned and operated by COLT.³ COLT's involvement with the MAC is limited to providing services pursuant to a contractual arrangement with Cirion. COLT is independent and not affiliated with, nor does it hold any ownership interest in, Cirion. Any rights exercised by COLT in connection with the MAC are limited to those expressly set forth in a service agreement. Cirion owns and controls 100% of the U.S. segments of the MAC Cable systems. Cirion's arrangement with COLT is

³ Cirion has entered into a colocation agreement with Lumen Technologies Europe Limited ("Lumen"). Lumen was formerly part of the same group of companies as Lumen Technology US, but on November 1, 2023, it was divested and became a member of the Colt group of companies.

based on a commercial agreement that remains in effect through 2035. Through this agreement, COLT will provide subsea network services to operate and maintain its equipment and services at the site.

Hollywood, Florida is a key landing site on the southeastern coast of the U.S. The landing station is owned and controlled by Cirion. Lastly, St. Croix, U.S. Virgin Islands – Serving as a strategic Caribbean landing point. Cirion St. Croix, Inc., a direct wholly owned subsidiary of Cirion, owns the U.S. landing station where the MAC cable lands in St. Croix, U.S. Virgin Islands. Cirion exercises de jure and de facto control over Cirion St. Croix, Inc., the cable landing station, and the portions of the MAC submarine cables located in the territorial waters of the United States near St. Croix, U.S. Virgin Islands. Accordingly, Cirion controls which persons or entities have access to space and terminal equipment supporting the MAC cable system.

The MAC submarine cable system will continue to operate on a non-common carrier basis, providing service indifferently to all members of the public who request it. Cirion confirms that there are no proposed changes to the cable license. Cirion respectfully requests review and approval of the current renewal application for the continued use of operations.