

Narrative Description of the South-American Crossing Cable System

In accordance with 47 CFR Part 1, Subpart FF, the Cirion hereby amends the South-American Crossing Cable System (“SAC”) 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.

The SAC is a non-common carrier system, with a length of 20,000 KM, that loops around the east and west coasts of South America, connecting eight countries and one US territory. Specifically, the landing points are the following: (1) Buenaventura, Colombia; (2) Fort Amador,

Panama; (3) Fortaleza, Brazil; (4) Rio de Janeiro, Brazil; (5) Santos, Brazil; (6) Las Toninas, Argentina; (7) Puerto Viejo, Venezuela; (8) Lurin, Peru; (9) St. Croix, United States Virgin Islands; and (10) Valparaiso, Chile. The SAC has been operating since September 01, 2000. The SAC currently provides 1.25 Tb of available capacity and has a design capacity of 1700 Gbps. The continued operation of the SAC will benefit customers by remaining a valuable source of submarine cable capacity and fostering competition along key subsea routes. Its reauthorization is therefore in the public interest, convenience, and necessity of the United States, as it provides critical infrastructure for global connectivity between North and South America

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

Route Description/Path	Number of Fiber Pairs	Lit Capacity (Gbps)	Design Capacity (Gbps)
Segment East A – St. Croix to Fortaleza, Brazil	3	15340	17000
Segment East B – Fortaleza, Brazil to Rio de Janeiro, Brazil	3	20000	20000
Segment East C – Rio de Janeiro, Brazil to Santos, Brazil	3	23600	36350
Segment East D – Santos, Brazil to Las Toninas, Argentina	3	13840	15900
Segment West F – Valparaiso, Chile to Lurin, Peru	3	11880	18400
Segment West GI – Lurin, Peru to Fort Amador, Panama	2	7900	12750
Segment West GH – Lurin, Peru to Punta Bazan, Colombia	1	6200	6650
Segment West HI – Punta Bazan, Colombia to Fort Amador, Panama	1	10200	10800

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