

March 27, 2015

VIA IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Supplemental Letter Filing - In the Matter of Emerald Networks Holdings Limited's Notification of Pro Forma Assignment of its Submarine Cable Landing License to America Europe Connect Licenses Limited (File Nos. SCL-LIC-20140206-00002; SCL-ASG-20150303-00006

Dear Ms. Dortch:

Emerald Networks Holdings Limited ("Emerald"), FRN 0023331861, and America Europe Connect Licenses Limited ("AECL"), FRN 0024369852, hereby submit the following supplemental information in support of Emerald's pro forma assignment of its submarine cable landing license to AECL, which was filed on March 3, 2015¹ via the International Bureau's (IB) IBFS electronic filing system.

Specifically, Emerald and AECL provide the following information: (1) a narrative of the means by which the assignment will take place pursuant to 47 C.F.R. § 1.767(a)(11)(i); (2) the Anti-Drug Certification pursuant to 47 C.F.R. § 63.18(o); (3) the Routine Conditions Certification pursuant to 47 C.F.R. § 1.767(a)(9); (4) a statement regarding a change in the name of the cable network; and (5) an acknowledgement that Emerald will continue to comply with the terms of the Letter of Assurances, dated October 1, 2014.

¹ See Letter from Robert E. Stup, Jr. to Marlene H. Dortch, Secretary, Federal Communications Commission, IB File No. SCL-ASG-20150303-00006 (Mar. 3, 2015).

DESCRIPTION OF THE MEANS BY WHICH THE ASSIGNMENT WILL TAKE PLACE AS REQUIRED BY 47 C.F.R. § 1.767(a)(11)(i)

Emerald transferred its undersea cable license² to AECL, which is a wholly owned subsidiary of America Europe Connect Limited (“AEC”), when it transferred all of Emerald’s assets to AECL. Emerald is not being merged into AECL. Emerald will remain a sister company to AEC until it is dissolved.

ANTI-DRUG CERTIFICATION REQUIRED BY 47 C.F.R. §§ 1.767(a)(8) AND 63.18(o)

Both Emerald and AECL certify that pursuant to sections 1.2001 through 1.2003 of the Commission’s rules they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

CERTIFICATION REGARDING ROUTINE CONDITIONS SET FORTH IN 47 C.F.R. § 1.767(g)

Emerald and AECL certify that they will accept and abide by the routine conditions specified in Section 1.767(g) of the Commission’s rules.

CABLE NETWORK NAME CHANGE STATEMENT

Emerald and AECL respectfully request to change the name of the cable network upon the transfer of the license to AECL. In the Public Notice granting Emerald’s submarine cable landing license,³ the cable network is referred to as the “Emerald Express Cable Network.”⁴ Due to the transfer of Emerald’s license to AECL, both Emerald and AECL wish to change the name of the cable network to “AECConnect.”

CONTINUED COMPLIANCE WITH THE TERMS OF EMERALD’S LETTER OF ASSURANCES

On October 1, 2014 Emerald provided a Letter of Assurances (“LOA”) outlining the commitments made by Emerald to the U.S. Department of Homeland Security (“DHS”) in order to address national security, law enforcement, and public safety concerns raised with regard to Emerald’s fiber optic submarine cable system linking the United States, Iceland, and Ireland.

² See *Actions Taken Under Cable License Act, Section 1.767(a) Cable Landing Licenses, Modifications, and Assignments or Transfer of Control of Interests in Cable Landing Licenses (47 C.F.R. § 1.767(a))*, Public Notice, DA 14-1533 (Oct. 24, 2014) (“2014 Emerald Undersea License PN”).

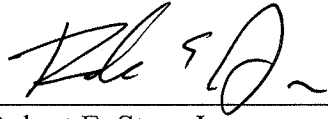
³ See *id.*

⁴ *Id.* at 2.

AECL acknowledges that it will comply with the terms and conditions of the October 1, 2014 LOA.

Respectfully submitted,

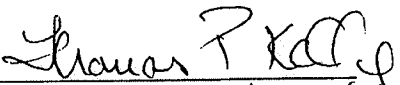
**Emerald Networks Holdings Limited
America Europe Connect Limited**



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*Counsel to Emerald Networks Holdings Limited and
America Europe Connect Licenses Limited*


Certification

On behalf of Emerald Networks Holdings Limited, I hereby certify that the foregoing supplemental letter filing in connection with Emerald Networks Holdings Limited's pro forma assignment of its undersea cable license was prepared under my direction and control. I further certify that all of the information contained in the attached supplemental letter filing is true and accurate to the best of my knowledge.


Name: THOMAS P KELLY
Title: DIRECTOR - EMERALD NETWORKS
Date: MARCH 19, 2015

Certification

On behalf of America Europe Connect Licenses Limited, I hereby certify that the foregoing supplemental letter filing in connection with Emerald Networks Holdings Limited's pro forma assignment of its undersea cable license was prepared under my direction and control. I further certify that all of the information contained in the attached supplemental letter filing is true and accurate to the best of my knowledge.


Name: *Greg Varisco*
Title: *Authorized Signatory*
Date: *March 18, 2015*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing letter was served on the following by first-class mail on March 27, 2015:

U.S. Coordinator, EB/CIP
U.S. Department of State
2201 C Street, N.W.
Washington, DC 20520-5818

Office of Chief Counsel/NTIA
U.S. Department of Commerce
14th St., NW and Constitution Ave., NW
Washington, DC 20230

Defense Information Systems Agency
Code RCG
701 S. Courthouse Road
Arlington, VA 22204