

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Application of Sprint)	
Communications Company L.P.,)	
Assignor,)	
)	
and)	File No. SCL-ASG-2019_____
)	
Atlantic Teleconnection Operating)	
Company Limited, Assignee,)	
)	
Application for Authority to Assign)	
Interest in Submarine Cable Landing)	
License)	

APPLICATION

I. INTRODUCTION

Pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39, Section 1.767 of the Federal Communications Commission's ("Commission" or "FCC") rules, 47 C.F.R. § 1.767, and Executive Order No. 10530, Sprint Communications Company L.P. ("Sprint") and Atlantic Teleconnection Operating Company Limited ("ATOC") (collectively, "Applicants") hereby request approval to assign Sprint's 6.95388 percent interest in the Americas I Cable System to ATOC.

II. DESCRIPTION OF THE TRANSACTION AND PUBLIC INTEREST STATEMENT

Sprint currently holds a 6.95388 percent interest in the Florida – Caribbean segment of the Americas I Cable System, which links the U.S. Mainland with the U.S. Virgin Islands ("USVI") and connects to other cables serving other Caribbean islands and Central and South America. The Americas I Cable System has FCC ID Number SCL-LIC-19921101-00011.

Sprint and ATOC have entered into a Purchase Agreement pursuant to which ATOC has agreed to purchase Sprint's interest in the Americas I Cable System, subject to Commission approval. ATOC currently holds an approximately 0.70 percent interest in the Americas I Cable System. As a result of the proposed transaction, ATOC's interest would increase to approximately 7.65 percent.¹ Grant of this assignment of Sprint's interest to ATOC will serve the public interest, convenience, and necessity because it will enable ATOC to secure additional capacity on the Americas I Cable System. This, in turn, will enable ATOC to provide increased capacity, redundancy, resiliency, and reliability on the route between the USVI and the U.S. Mainland to ATOC's affiliates that provide telecommunications services in the USVI. ATOC's ultimate parent company, ATN International, Inc., also indirectly owns and controls the incumbent local exchange carrier in the USVI, Virgin Islands Telephone Corporation d/b/a Viya, and its affiliated USVI wireless provider, Vitelcom, Inc. d/b/a Viya.

III. INFORMATION REQUIRED UNDER SECTION 1.767 OF THE FCC'S RULES

In accordance with Section 1.767 of the Commission's rules, 47 C.F.R. § 1.767, the Applicants submit the following information:

(1) Name, Address, and Telephone Number of Each Applicant

Assignor/Licensee: Sprint Communications Company L.P.
6200 Sprint Parkway
Overland Park, Kansas 66251
(800) 829-0965

¹ The Applicants anticipate that an application for a cable landing license for the Americas I Cable System will be filed shortly. That application will seek Commission approval for the continued operation of the Americas I Cable System for an additional 25-year term following the expiration of its existing cable landing license on September 1, 2019. ATOC will be a party to the application.

Assignee: Atlantic Teleconnection Operating Company Limited
Commerce House, Wickhams Cay 1, POB 3140, Road Town
Tortola, British Virgin Islands
VG111TBC

(2) Place of Organization

Assignor/Licensee: Sprint is organized under the laws of Delaware.

Assignee: ATOC is organized under the laws of the British Virgin Islands.

(3) Contact Persons for This Application

Questions or inquiries concerning this application may be directed to:

Assignor/Licensee: Maria Cattafesta
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Counsel to Sprint

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(4)-(7) Not Applicable

**(8)(i) Certifications and Ownership Information Required by Sections
63.18(h) and (o) of the Commission’s Rules, 47 C.F.R. §§ 63.18(h), (o)**

Section 63.18(h) – Ownership Information

Following consummation of the transaction, the following entities will hold a ten percent or greater ownership information in ATOC:

Name	Address	Citizenship or Country	Principal Business	Percentage of Equity Held
Atlantic Teleconnection Holdings Company Limited (“ATHC”)	Commerce House, Wickhams Cay 1, POB 3140, Road Town, Tortola, British Virgin Islands, VG111TBC	British Virgin Islands	Telecom	100% of ATOC
GTT International Service SRL (“GTT SRL”)	79 Brickdam Georgetown, Guyana	Barbados	Telecom	100% of ATHC
Guyana Telephone & Telegraph Company Ltd (“GTT”)	79 Brickdam Georgetown, Guyana	Guyana	Telecom	100% of GTT SRL
Hong Kong Golden Telecom Company Limited (“HKGT”)*	Room 2801A, Lippo Centre, Tower 1, 89 Queensway, Hong Kong	Hong Kong	Telecom	20% of GTT
ATN International, Inc. (“ATNI”)	500 Cummings Center, Suite 2450, Beverly, MA 01915	USA	Telecom	80% of GTT
Cornelius B. Prior Jr.	P.O. Box 12030 St. Thomas, U.S. Virgin Islands 00801	USA	Retired	27.4% of ATNI

*ATOC was informed by representatives of HKGT in May 2018 that HKGT is 100% owned by Datang Telecom International Technology (Hong Kong) Co., Ltd. (“DTIT”) and that DTIT is indirectly controlled, but not wholly owned, by China Academy of Telecommunications Technology. ATOC does not have any additional information about HKGT’s ultimate ownership.

Section 63.18(h) – Interlocking Directorates

ATOC currently has the following interlocking directorates:

Director or Officer	Role with ATOC	Role with Other Foreign Carrier
Brad Martin	Director & CEO	Director, GTT Vice President, One Communications, Ltd.
Mary Mabey	Director & Assistant Secretary	Director & Secretary, GTT
John Audet	Director	Director, GTT
Justin Nedd	CFO & Treasurer	President & CEO, GTT
Domenic Micale	Vice President & Asst. Treasurer	Vice President & Asst Treasurer, GTT
Michele Satrowsky	Vice President & Asst. Treasurer	Vice President & Asst Treasurer, GTT

Section 63.18(o) – Anti-Drug Abuse Certification

As evidenced by the signature of ATOC’s representative to this Application and the certification appended hereto, ATOC certifies pursuant to Sections 1.2001 through 1.2002 of the Commission’s rules, 47 C.F.R. §§ 1.2001-1.2002, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

8(ii) Certification Regarding Foreign Carrier Status and Foreign Affiliation

ATOC certifies that it:

- (A) is not a foreign carrier in any foreign country;
- (B) does not own or control a cable station in any foreign country; and
- (C) is affiliated with foreign carriers, including foreign carriers that control cable landing stations in foreign countries, only as summarized in the table below.

Name of the affiliated carrier	Countries in which carrier is authorized to provide telecommunications services to the public
Bermuda Digital Communications Ltd.	Bermuda
Cable Co. Ltd.	Bermuda
Cedar Cable Ltd.	Bermuda
Guyana Telephone & Telegraph Company Ltd.	Guyana
One Communications Ltd.	Bermuda
WestTel Limited, d/b/a Logic	Cayman Islands

8(iii) Certification Regarding Destination Markets

The Americas I Cable System is a U.S. domestic submarine cable system and does not land in any foreign destination country. Consequently, ATOC certifies that it does not seek via this application to land and operate a submarine cable connecting to any foreign country, including any foreign country in which (A) ATOC is a foreign carrier; (B) ATOC controls a foreign carrier; (C) there exists any entity that owns more than 25 percent of ATOC, or controls ATOC, or controls a foreign carrier in such country; or (D) a grouping of two or more foreign carriers in such a country (or parties that control foreign carriers in such a country) own, in aggregate, more than 25 percent of ATOC and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity.

(8)(iv) Certification Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Market

No response is required because ATOC did not identify any non-WTO markets in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

(9) Routine Conditions Specified in Section 1.767(g) of the Commission's Rules

As evidenced by the signature of ATOC's representative to this application and the certification appended hereto, ATOC certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

(10) Other Information

The proposed transaction underlying this assignment application does not require the filing of a foreign carrier affiliation notification pursuant to Section 1.768 of the Commission's rules, 47 C.F.R. § 1.768, because the Americas I Cable System does not land in a foreign destination market. Therefore, it is not possible for ATOC to be affiliated with a foreign carrier that serves a foreign destination market served by the Americas I Cable System.

IV. STREAMLINED PROCESSING REQUEST

The Applicants request streamlined processing of this application under Section 1.767(k) of the Commission's rules, 47 C.F.R. § 1.767(k). The Applicants certify that the Americas I Cable System will not land in any foreign country destination market and therefore it is not possible for either Applicant to have any affiliation with a foreign carrier in an Americas I Cable System foreign destination market. In addition, ATOC is not a foreign carrier.

V. CONCLUSION

For the reasons presented herein, Applicants submit that the public interest, convenience, and necessity would be served by a grant of this application for assignment of the specified interests in the Americas I Cable System, and respectfully request that this application be granted.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.

/s/ Emily J.H. Daniels

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/s/ Phillip R. Marchesiello

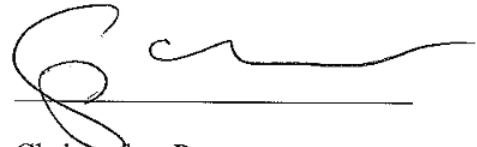
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Counsel to ATOC

February 22, 2019

CERTIFICATION

I am authorized to enter this certification on behalf of Atlantic Teleconnection Operating Company Limited. All of the information contained in this application is true and correct to the best of my knowledge and belief.

Dated: February 21, 2019

A handwritten signature in black ink, appearing to read 'Christopher Pepper', written over a horizontal line.

Christopher Pepper
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