

February 10, 2020

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

*Re: Reliance Globalcom Limited, Debtor-in-Possession and GCX OpCo: Application for Consent to Assign the Cable Landing License for the FLAG Atlantic-1 System, SCL-ASG-20200127-00005*

Dear Ms. Dortch:

Through counsel, Applicants Reliance Globalcom Limited, Debtor-in-Possession (“RGL DIP”), and GCX OpCo (“GCX OpCo”) supplement the above-referenced application (“Application”) to assign the cable landing license held by RGL DIP for the FLAG Atlantic-1 system to GCX OpCo—a to-be-formed, reorganized entity with new ownership. As identified in the Application, Reorganized GCX Limited will be owned by a diverse group of independent investors (“New Equity Holders”), none of which will hold a controlling voting or economic interest or exercise de facto control singly or jointly through any other arrangement. This supplement provides clarification with respect to the exercise of voting control over certain New Equity Holders, as follows:

***Bardin Hill Investment Partners LP funds.*** As noted in the Application, Jason Dillow, Kevah Konner, Pratik Desai, and John Greene exercise voting control over the various funds which will collectively hold a 14.8-percent direct interest in Reorganized GCX Limited. Bardin Hill Investment Partners LP serves as the general partner of each of those funds. Voting control is vested in Messrs. Dillow, Konner, Desai and Greene through the funds’ organizational documents, which expressly grant them the power to act on behalf of the funds, individually or collectively.

***Crown Ocean Capital P1 Limited and Vedra Finance Limited.*** As noted in the Application, these two funds will collectively hold an 11.46-percent voting and economic interest in Reorganized GCX. Two individuals, Konstantin Stoyanov and Christian Petersmann, exercise signatory authority individually or, as is their typical practice, collectively, over that 11.46-percent interest.

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Additionally, Applicants provide an updated Exhibit B, which correctly identifies the indirect voting and economic interests to be held by Värde Partners, Inc. (28.82 percent) and Bardin Hill Investment Partners LP (14.28 percent).

Should you have any questions regarding the information provided above, please contact Colleen Sechrest by telephone at +1 202 730 1308 or by e-mail at csechrest@hwglaw.com.

Yours sincerely,



Kent Bressie  
Colleen Sechrest

*Counsel for Reliance Globalcom Limited,  
Debtor-in-Possession, and GCX OpCo*

Attachment

cc: David Krech  
Jodi Cooper  
Maury Mechanick (*counsel for New Equity Holders*)

**Exhibit B**  
**GCX OpCo Post-Consummation Ownership Structure**

