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IT&E

May 2, 2018

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

Re: Section 1.767(g)(15) in-service notification for PTI Pacifica, Inc.
Submarine Cable License SCL-LIC-19921015-00007 (formerly SCL-92-003)

Dear Ms. Dortch:

This letter is submitted on behalf of PTI Pacifica, Inc. ("PTI Pacifica"), formerly known as GTE Pacifica Inc. ("GTE Pacifica"). PTI Pacifica is the licensee of the above-referenced submarine cable license linking the islands of Saipan, Tinian and Rota in the Commonwealth of the Northern Mariana Islands ("CNMI") to the U.S. Territory of Guam. The license initially was granted to the Micronesian Telecommunications Corporation ("MTC") on February 3, 1993, when MTC was ultimately owned by GTE Corporation.[1]

The FCC granted the *pro forma* assignment of the submarine cable license from MTC to its wholly-owned subsidiary GTE Pacifica on December 18, 1997. Control of MTC and GTE Pacifica was transferred to Verizon after the FCC approved of Verizon's acquisition of GTE in 2000.[2] The FCC subsequently approved the transfer of control of MTC and GTE Pacifica from Verizon subsidiary Bell Atlantic New Zealand Holdings, Inc. to Pacific Telecom Inc. in 2003,[3] although the transaction

[1] Micronesian Telecommunications Corporation, Application for a License to Land and Operate a High Capacity Digital Submarine Cable System Extending Between the Commonwealth of the Northern Mariana Islands and Guam, *Cable Landing License*, 8 FCC Rcd 748 (CCB 1993).

[2] In re Application of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee; For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License, *Memorandum Opinion and Order*, 15 FCC Rcd 14032 (2000).

[3] Bell Atlantic New Zealand Holdings, Inc., Transferor, and Pacific Telecom Inc., Transferee, Applications for Consent to Transfer Control of a Submarine Cable Landing License, International and Domestic Section 214 Authorizations, a Cellular Radiotelephone License, Common Carrier and Non-Common Carrier Satellite Earth Station Licenses, and a Petition for Declaratory Ruling Pursuant to Section 310(b)(4) of the Communications Act, *Order and Authorization*, 18 FCC Rcd 23140 (2003).

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did not close until September 20, 2005. The name of the submarine cable licensee was changed from GTE Pacifica to PTI Pacifica in 2006. MTC and PTI Pacifica each now do business under the trade name IT&E.

In compliance with the International Bureau's request, PTI Pacifica has looked for the letter that GTE Corporation filed to notify the FCC of the date that the cable was put into service but has been unable to find a copy. That date is used to calculate the 25-year license term for the cable license.

In response to the International Bureau's request, however, we are submitting this letter and attachments demonstrating the in-service date. PTI Pacifica has found contemporaneous documentation that the final beach joint of the submarine cable was completed on February 13, 1997, thereby providing optical continuity among terminal stations on all islands for the first time.[4] With an in-service date of February 13, 1997, the expiration date of the submarine cable license should be no earlier than February 13, 2022. Assuming that the cable is still operational at that time, PTI Pacifica (or its successor) will file a renewal application in advance of that date in accordance with then-applicable rules and procedures.

Please contact PTI Pacifica's outside counsel, Timothy J. Cooney, at 202-383-3361 or tcooney@wbklaw.com if you have any questions.

Thank you.

Sincerely,

Steven Carrara
General Counsel

[4] See next to last page of the attachment.

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MTC

SYSTEM LOADING & LAYING REPORT (TEXT)

S.12396
VOLUME 1

ALCATEL
SUBMARINE NETWORKS

Alcatel Submarine Networks Limited

INSTALLATION DEPARTMENT DOCUMENT

MTC INTERISLAND CABLE SYSTEM

SYSTEM LOADING & LAYING REPORT

ISSUE	DATE	DOC. REF.
1	7-5-97	INST. 10384.SOW

AUTHORISATION			
SIGNATORY	**SIGNATURE**	**NAME**	**DATE**
ORIGINATOR		P.M. BETTS	30/6/97
CHECKED		K. BURKE	14/7/97
UNREPEATERED MARINE OPERATIONS MANAGER		M. McGOVERN	

Please refer all queries to the originator

DOCUMENT CONTROL SHEET

Issue	Date	Comments
1	7th May 1997	First Issue

1. Introduction

MTC fibre cable system is an inter island network linking the islands of Guam, Rota, Tinian and Saipan. The system was designed and built in 1993 but installation was delayed due to serious permitting problems. The system was made with S3 STP, C65 and A65 cable containing 12 fibres. The order of lay was Guam to Rota segment 1, Rota to Tinian Segment 2 and Tinian to Saipan segment 3.

SAIC Maripro installed the system from a ship of convenience, the MV Kendrick, using a modular spread.

All land cable had been previously installed by ASN and an "enhanced" beach jointing programme meant that the system was completed, terminal to terminal, as the ship completed the final shore end by mid February 1997.

2. Project Overview

Land Cable

Land cable installation commenced in December 1996 with the pulling in of land cable at Guam, Rota, Tinian and Saipan. All of the land routes were completed as planned with all land cables being installed with out the need of a land cable joint, detail of this operation can be found in Appendix 2. The land cable was terminated into cable terminating boxes 'CTBs' which were secured to a designated location on the wall of each terminal station. From the CTB's the fibres were routed through copex tubing into cable terminating racks 'CTRs'. The original plan was to terminate the fibres in the CTR's to Biconics connectors which was later changed to FC type connectors at the request of MTC.

Marine

SAIC Maripro (SAIC) were awarded the contract for installation of MTC in Q4 1996. They mobilised the MV Kendrick from Singapore to Portland in December 1996 and then fitted their modular cable handling system.
Weather delays resulted in a delay in transit to Guam, but the vessel finally arrived on the 27th January 1997. Mobilisation of the vessel was completed whilst the Kendrick was alongside and ASN personnel joined at this point.
SAIC used both the Kendrick and a small tug, the Chamorro, to install moorings at the landings.

Guam

The first shore end landing took place at Tanguission Point in Guam on the 5th Feb 97. Due to permitting constraints the cable ship was forced to hold position with out the use of anchors and was not allowed to install articulated pipe on the shore end as it was landed. The installation of articulated pipe at Guam was completed as a separate operation at the end of the lay programme by a dive team.

The shore end cable at Guam was pulled in a straight line from the ship to a point at the beginning of the reef, where it entered a previously installed steel conduit. The conduit directed the cable under a lagoon and up the beach to a slack pit where 8 existing AT&T cables are snaked. The MTC cable was snaked in the same manner to follow the existing cables up to the beach joint location. On the day of the cable landing loops were put on all fibres at the end of the sea cable to allow monitoring from the ship. On completion of the lay the loops were cut off and a permanent joint was assembled. The completed beach joint was carefully placed along side the existing beach joints and the area filled with fine sand up to point were the cable and joints were not visible. Sheets of ply wood were then placed on top of the sand and the whole area was then back filled and levelled with an excavator. The beach jointing and slack pit burial was completed on the 7th February 97.

Rota

The MV Kendrick arrived in Rota on 6th February 97 after completing the main lay from Guam. The cable landing at Rota was conducted as a single operation with out the need for a final splice. On arrival at Rota MV Kendrick tied up to two previously installed anchors at approximately 20 msw (metres sea water) from which the second shore end of segment one was landed. Pulling of the shore end cable was controlled by two excavators through a turning quadrant parallel to the beach. Prior to the cable landing a sand channel was identified across the reef which the cable would finally rest to minimise the contact with coral. The shore end cable was successfully pulled through this channel with articulated pipe being applied from the ship during the landing. On completion of the shore end landing a length of slack cable was left at the 20msw point snaked on the sea bed. Due to high surf the cable end was not pulled into the beach manhole until low tide at midnight 7th Feb, 24 hours after the shore end landing. The permanent beach joint for Rota segment one was completed during the lay of segment 2 on 9th February 97.

Segment two, shore end landing two at Rota commenced on 8th February in rough sea conditions. As a consequence of the rough conditions articulated pipe was not installed from the ship during the cable landing. Application of the pipe was conducted as a separate operation on completion of the main lay. The cable was pulled into the beach manhole on the same day as the landing where a temporary joint was assembled between the land cable to allow testing from the ship and shore. On completion of the lay this joint was removed and a

permanent beach joint constructed as on segment one. Both joints were stored in the beach manhole at Rota with 20 metres of spare sea cable being coiled in on both.

Tinian

Segment two , shore end landing one at Tinian commence on 9th February 97. As before the ship was secured to two previously installed mooring points where she stayed for this landing and over night for the second. The landing point at Tinian is a sheltered location and as a consequence the sea was very calm during both landings. Segment two cable was landed as a jointless shore end with a short section of articulated pipe being installed from the ship. On completion of the shore end landing a length of slack cable was left at the 20msw point snaked on the sea bed. The landing point at Tinian followed an old oil supply pipe line which crossed natural gullies in the sea bed. To minimise cable suspensions the cable was tied to the pipes where it crossed the gullies to avoid large suspensions.

The first landing of segment 3 at Tinian followed the same route as segment two from the 20msw point. Articulated pipe was applied as before from the ship and floated ashore. Both cables were floated up to a point where the articulated pipe butted up against the PVC duct leading into the beach manhole. This transition point was later encapsulated in concrete to cover 5 metres of the articulated pipe. On completion of the cable landing loops were spliced to the end for testing purposes, the ship departed Tinian for Saipan on 10th Feb. During the lay of segment 3 the beach joints for segment 2 in Tinian and Rota were both constructed in parallel to allow commissioning of this link to comence as soon as possible.

Saipan

The ship arrived off Saipan on 11th Feb for the final shore end landing where she was secured to two previously installed mooring points as before at Tinian and Rota. The cable was landed as a joint less shore end with articulated pipe being installed from the ship. When all of the required cable was pulled ashore the ship lowered the final bight on the sea bed to leave an S shape of slack cable behind. The length of articulated pipe applied was positioned so the end facing the beach crossed the reef and entered the lagoon by approximately 5 metres. From this point a trench was later dug in towards the shore up to the duct entrance on the beach. The cable was placed in this trench including the last 3 sections of articulated pipe and encapsulated with concrete.
The final beach joint at Saipan was completed on 13th Feb 97 giving optical continuity between terminal stations on all Islands.
From Saipan MV Kendick transited to Guam where the MTC spare marine cable was off loaded onto the quay side.

1. INTRODUCTION

This report details the land cable installation and jointing relating to MTC. The land cable at each site is installed in one continuous length with no intermediate joints. The land cable is jointed to the marine cable using a variant of the ASN type 2 land joint. At the Tanguissan Point landing in Guam the beach joint is directly buried on the beach. At all other sites the beach joints are stowed conventionally in manholes. LRD's (Land Route Drawings) of each site are included as Appendix 1.

1.1 System Description

Land Cable Type	NT 'Lite Tube' 12 fibre
Beach Joint Type	ASN Type 2
Beach Joint Specification	SSS 034 Issue 2
Shore End Sea Cable Type	ASN S3 12 fibre, Hytrel Package

2. SUMMARY OF EVENTS

The land cable in Rota, Tinian and Saipan was installed between the dates 10 > 22 December 1996 under direct supervision of ASN. The land cable at Tanguissan Point, Guam was installed independently by AT & T.

The beach joints were made by ASN immediately following the marine cable installation between the dates 5 > 14 February 1997.

3. TEST RESULTS

The land cable at each site was optically tested once it was installed. The beach joints at each site were tested uni-directionally from the adjacent terminal station. Optical test results relating to each beach joint are included as Appendix 3.

3.1 Electrical Measurements

The land cable does not contain any electrical conductors. Therefore all electrical measurements on the sea cable have to be made from the electrode protruding from the sea cable end of the beach joints.