

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

In the Matter of)
)
Primus Telecommunications, Inc.) File No. SCL-MOD-2013_____)
)
Cable Landing License Modification)
Request to Relinquish Interest in Cable Landing License)
_____)

**CABLE LANDING LICENSE MODIFICATION
REQUEST TO RELINQUISH INTEREST IN CABLE LANDING LICENSE**

Primus Telecommunications, Inc. (“Primus”), by its undersigned counsel, hereby respectfully requests that the Commission modify the Japan-US cable landing license (“License”) issued by the Commission on July 9, 1999, in FCC File No. SCL-LIC-19981117-00025, to remove Primus as a licensee pursuant to Section 1.767(m)(2) of the Commission’s Rules, 47 C.F.R. § 1.767(m)(2), and the Commission’s *Submarine Cable Report and Order*.¹ The Japan-US Cable Network (“Japan-US CN”) extends between the U.S. and Japan.² Primus’ voting interest and ownership interest in Japan-US CN are both 0.18692%. Primus does not own or control any of the U.S. cable landing stations for Japan-US CN. In addition, Primus understands that the owners of the U.S. cable landing stations for Japan-US CN will not change as a result of this request. Given Primus’ minimal investment in Japan-US CN, Primus does not

¹ *Review of Commission Consideration of Applications under the Cable Landing License Act, Report and Order*, 16 FCC Rcd 22167, ¶ 59 (2001) (“*Submarine Cable Report and Order*”).

² *See* AT&T et al., Joint Application for a License to Land and Operate a Submarine Cable Network System Between the United States and Japan, File No. SCL-LIC-19981117-00025, Cable Landing License, 14 FCC Rcd 13066 (1999).

have the ability to affect the operation of Japan-US CN. Accordingly, even after Primus relinquishes its U.S. license, the remaining Japan-US CN licensees will retain collectively *de jure* and *de facto* control of the U.S. portion of Japan-US CN sufficient to comply with the requirements of the Commission's rules and any specific conditions of the License.

In addition, Primus respectfully requests streamlined processing of this application in accordance with Sections 1.767(j)-(k) of the Commission's Rules, 47 C.F.R. § 1.767(j)-(k). Primus hereby certifies that it is not a foreign carrier and that it is not affiliated with a foreign carrier in Japan.

As required by the Commission's Rules and the *Submarine Cable Report and Order*, concurrent with this filing, Primus is serving a copy of this Application to the governmental agencies listed in Section 1.767(j) and to each of the other joint U.S. licensees of the License using the address on file with the Commission.

For the foregoing reasons, Primus respectfully requests that the License be modified as described herein.

Respectfully submitted,

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Counsel for Primus Telecommunications, Inc.

Dated: February 27, 2013

VERIFICATION

I, John Coltman, state that I am Director -- Wholesale US Domestic Services of Primus Telecommunications Group, Inc., the ultimate parent of Primus Telecommunications, Inc.; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed this 26th day of February, 2013.



John Coltman
Director -- Wholesale US Domestic Services
Primus Telecommunications Group, Inc.

CERTIFICATE OF SERVICE

I, Danielle Burt, hereby certify that on this the 27th day of February 2013, I served a copy of the foregoing document via First Class Mail, postage pre-paid, to the following:

/s/ Danielle Burt

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