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ATTORNEYS AT LAW

27 April 1999

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: AT&T et al., Joint Application for a License to Land and Operate a Submarine Cable Network Between the United States, Denmark, Germany, the Netherlands, France, and the United Kingdom, The TAT-14 Cable System, File No. SCL-LIC-19990303-00004—Notice of Ex Parte Presentation

Dear Ms. Salas:

Tyco Submarine Systems Ltd. ("TSSL") submits this letter to correct a number of factual errors in the record in the above-referenced proceeding. These misstatements pertain to the activities of TSSL and its corporate parent, Tyco International Ltd. ("Tyco").

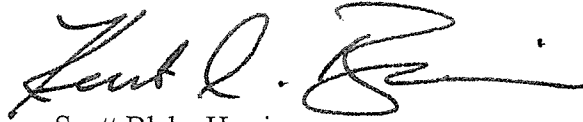
In their discussion of non-common carrier submarine cable systems on the trans-Atlantic route, the applicants make a number of erroneous statements regarding TSSL and Tyco.¹ First, fundamentally and importantly, TSSL is an *independent* supplier, installer, and maintenance service provider for submarine cable systems. Second, Submarine Systems, Inc., (later TSSL)—

¹ See AT&T *et al.*, Joint Application for a License to Land and Operate a Submarine Cable Network Between the United States, Denmark, Germany, the Netherlands, France, and the United Kingdom, File No. SCL-LIC-19990303-00004, at 12 (filed Mar. 3, 1999) ("TAT-14 Application").

not Tyco—constructed the AC-1 cable system.² Third, neither TSSL nor Tyco is an investor in the AC-1 cable system, and as such, neither company contributed capital to that cable system. TSSL obtained the cable landing license from the FCC, and is currently seeking to assign that license to a subsidiary of Global Crossing Ltd.³

For the foregoing reasons, TSSL respectfully requests that the record reflect the factual clarifications detailed above.

Respectfully submitted,



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² See SSI Atlantic Crossing LLC, Joint Application for Consent to Assignment of License to Land and Operate in the United States a Digital Submarine Cable System Between the United States and the United Kingdom, Germany, and the Netherlands, File No. SCL-ASG-19981207-00028, at 2 (filed Dec. 7, 1998), *contra* TAT-14 Application, at 12. While the original cable landing license application was pending, AT&T sold its Submarine Systems, Inc., subsidiary to Tyco.

³ See *id.*