



August 1, 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 Tata Communications (America) Inc. Submarine Cable License SCL-LIC-20000308-00007

Dear Ms. Dortch:

This letter is submitted on behalf of Tata Communications (America) Inc. (“TC America”), licensee of the above-referenced submarine cable license for the TGN Atlantic system. The license initially was issued on August 8, 2000 to TyCom Atlantic (US) Inc.¹ The license was assigned to VSNL Telecommunications (US) Inc. in a substantial transaction in 2005,² and, in a subsequent *pro forma* transaction, to TC America in 2011.³

At the request of the International Bureau staff, TC America has looked for the letter by which the initial licensee notified the Federal Communications Commission (“FCC”) of the date that the cable was put into service but has been unable to find a copy. TC America, however, has found contemporaneous documentation that the submarine cable was placed into service in June 2001. Specifically, Tycom Ltd’s 10-Q Report for the period ending on June 30, 2001 stated: “In June 2001, the transatlantic segment of the TGN [TyCom Global Network] became operational.”⁴ This is consistent with the FCC International Bureau’s 2001 Year-End Circuit Status Report that states on numbered page 4 that the “Tyco Atlantic” cable went into service in 2001.⁵ Without first-hand knowledge of the day in June 2001 that was the actual in-service date, TC America proposes that June 15, 2001 be considered the in-service date for purposes of calculating the 25-year expiration date of the license.⁶

¹ TyCom Atlantic (US) Inc., Application for a License to Land and Operate a Private Fiber-Optic Cable System Between the United States Mainland and the United Kingdom, *Cable Landing License*, 15 FCC Rcd 14881 (IB 2000).

² *Public Notice*, Actions Taken Under Cable Landing License Act, 20 FCC Rcd 8557 (2005).

³ *Public Notice*, Actions Taken Under Cable Landing License Act, 26 FCC Rcd 11311 (2011).

⁴ See <https://www.sec.gov/Archives/edgar/data/1108511/000095013001503799/0000950130-01-503799-index.htm>, at 9 (see also page 11: “the transatlantic portion of the TGN . . . was placed in service in June 2001”).

⁵ The 2001 report is available on the FCC’s website at <https://www.fcc.gov/circuit-status-report>.

⁶ An in-service date after June 8, 2001 appears appropriate as an FCC submarine cable landing license order granted that date suggested that the TyCom Atlantic cable was not yet operational. Cable & Wireless USA, Inc., Application for a License to Land and Operate a Private Fiber-Optic Cable System Between the United States, the United Kingdom, and France, *Cable Landing License*, 16 FCC Rcd 12023, 12027 n.33 (IB 2001).

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Let me know if you have any questions.

Thank you.

Respectfully submitted,

/s/ Teresa Marrero

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