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26 March 2010

BY ELECTRONIC FILING

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

Re: Surrender Cable Landing License for Certain Submarine Cable Assets of Tyco Electronics Subsea Communications LLC (FCC File Nos. SCL-LIC-20050304-00011) Following the System Transfer Date for the Unity Cable System (FCC File No. SCL-LIC-20080516-00010)

Dear Ms. Dortch:

By this letter, Tyco Electronics Subsea Communications LLC (“TE SubCom,” formerly known as Tyco Telecommunications (US) Inc.) surrenders its cable landing license for existing cable landing assets (“G4 Assets”) for the unbuilt segment of the Tyco Pacific undersea cable system (“G4 Segment”).¹ On August 4, 2008, TE SubCom filed the attached letter with the Commission memorializing its discussions with International Bureau staff and counsel for owners of the Unity undersea cable system regarding the purchase of the G4 Assets by the Unity owners and TE SubCom’s intent to surrender its cable landing license on or around the system transfer date for the Unity system.

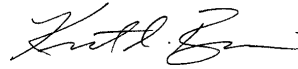
On March 25, 2010, TE SubCom transferred ownership of the G4 Assets to the Unity owners. As the Unity owners already hold a cable landing license for the whole of the Unity system, including the G4 Assets, TE SubCom’s cable landing license is now superfluous. Moreover, TE SubCom now no longer owns any assets pertaining to the G4 Segment or subject to the G4 Cable Landing License. Consequently, as previously agreed with Commission staff, surrender is appropriate.

¹ See Public Notice, Actions Taken Under the Cable Landing License Act, 20 FCC Rcd 8564 (Int’l Bur. 2005) (“G4 Cable Landing License”) (granting a separate cable landing license to Tyco Telecom); FCC File No. SCL-LIC-20050304-00011.

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Should you have any questions regarding this surrender notice, please contact Kent Bressie at +1 202 730 1337 or kbressie@wiltshiregrannis.com.

Respectfully submitted,



Kent D. Bressie

*Counsel for Tyco Electronics Subsea
Communications LLC*

Attachment

cc: Jim Ball (IB)
David Krech (IB)
George Li (IB)
Susan O'Connell (IB)
Paul Gagnier (Bingham McCutchen)



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4 August 2008

BY HAND DELIVERY

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

Re: Confirmation of Intent to Surrender Cable Landing License for Certain Submarine Cable Assets of Tyco Telecommunications (US) Inc. (FCC File Nos. SCL-LIC-20050304-00011) on or Around the System Transfer Date of the Unity Cable System (FCC File No. SCL-LIC-20080516-00010)

Dear Ms. Dortch:

Tyco Telecommunications (US) Inc. (“Tyco Telecom”) serves as the system supplier for the Unity Cable System (“Unity”), an undersea cable system connecting the United States and Japan for which Unity’s owners have filed a cable landing license application currently pending before the Commission.¹ Pursuant to the supply agreement between Tyco Telecom and Unity’s owners, Tyco Telecom will manufacture and install Unity. In light of the Unity owners’ selection of a California landing for Unity’s U.S. end and election of an option to acquire existing cable landing assets from Tyco Telecom in connection with that California landing, Tyco Telecom will also sell to the Unity owners all of Tyco Telecom’s interests in those cable landing assets (“G4 Assets”). At the request of FCC International Bureau staff, Tyco Telecom is filing this letter to clarify the disposition of the G4 Assets and the associated cable landing license issued by the Commission for those assets.

¹ See Application for a Cable Landing License, FCC File No. SCL-LIC-20080516-00010 (filed May 16, 2008).

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Tyco Telecom's G4 Assets consist of a stubbed segment of fiber-optic cable extending 6 kilometers seaward from Hermosa Beach, California, rights in certain ducts, conduits, and bore pipes, and other contractual rights under an IRU agreement between Tyco Telecom and Tata Communications (US) Inc. f/k/a VSNL Telecommunications (US) Inc. ("Tata"). The cable stub does not connect to any foreign or domestic point and has never carried any traffic. Tyco Telecom had built these facilities in connection with a never-completed section of the TGN Pacific undersea cable system ("G4 Segment"), which at one time was to include a southern, California-Hawaii-Guam segment. At the time, Tyco Telecom was both a system supplier and an operator of its own global undersea fiber-optic network, the Tyco Global Network ("TGN"). In 2005, Tyco Telecom exited the network operations business to concentrate once again on its system supply and maintenance businesses. It did so by selling TGN—including TGN Pacific—to Tata in a transaction consummated on June 30, 2005. As Tyco Telecom retained the G4 Assets, in the hopes of selling them at a later date in connection with a system supply contract, the International Bureau issued a separate cable landing license for those assets.²

Pursuant to the terms of the supply agreement, the G4 Assets will not be transferred to the Unity owners until the "system transfer date," a date to be determined by a variety of factors (including completion of all new construction) but which is likely to occur in the second quarter of 2010. By that date, the Unity owners will necessarily already hold a cable landing license for the whole of Unity (including the incorporated G4 Assets), rendering Tyco Telecom's G4 Cable Landing License superfluous. Upon transfer of the G4 Assets to the Unity owners, Tyco Telecom will hold no remaining assets pertaining to the G4 Segment or subject to the G4 Cable Landing License.

Consistent with these facts and discussions with FCC International Bureau staff, Tyco Telecom confirms its intent to surrender the G4 Cable Landing License on or around the system transfer date for Unity. At that time, Tyco Telecom will file a formal surrender notice with the Commission via IBFS.

² See Public Notice, Actions Taken Under the Cable Landing License Act, 20 FCC Rcd 8564 (Int'l Bur. 2005) ("G4 Cable Landing License") (granting a separate cable landing license to Tyco Telecom); FCC File No. SCL-LIC-20050304-00011.

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Should you have any questions or require further information, please contact me by telephone at +1 202 730 1337 or by e-mail at kbressie@harriswiltshire.com.

Respectfully submitted,



Kent D. Bressie
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