

**Mikelle Morra**

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**From:** Hector Mora [hmora@wmr-intl-law.com]  
**Sent:** Thursday, October 04, 2007 3:54 PM  
**To:** David Krech  
**Cc:** Imani Ellis; George Li; 'Linda Wellstein'  
**Subject:** RE: Pending Columbus Cable Landing Application

Yes, that is correct.

-----Original Message-----

**From:** David Krech [mailto:David.Krech@fcc.gov]  
**Sent:** Thursday, October 04, 2007 3:40 PM  
**To:** Hector Mora  
**Cc:** Imani Ellis; George Li; Linda Wellstein  
**Subject:** RE: Pending Columbus Cable Landing Application

Thank you.

Since one does not need to have a 50% or greater equity or voting interest to exercise de facto control over a corporation, I want to clarify that CFFI Ventures and, in turn, John Risley do not exercise control over Columbus International. Is that correct?

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**From:** Hector Mora [mailto:hmora@wmr-intl-law.com]  
**Sent:** Thursday, October 04, 2007 3:30 PM  
**To:** David Krech  
**Cc:** Imani Ellis; George Li; 'Linda Wellstein'  
**Subject:** FW: Pending Columbus Cable Landing Application  
**Importance:** High

Dear Mr. Krech,

Columbus International Inc. is the ultimate parent corporation of Columbus Networks USA, Inc. within the Columbus Group. See Chart N# 1 of Attachment 2. The owners of Columbus International, Inc. (the ultimate parent) are investors without direct involvement in the management of the group. The person with the highest equity and voting rights is Mr. John Risley who has control over CFFI Ventures (Barbados) Inc. and consequently equity and voting rights equal to 47.5% in the ultimate parent corporation of the Applicant, nonetheless he does not reach the equity and voting right threshold to have control over Columbus International, Inc. Therefore, there is not an entity or person with a majority interest (>50%) in the ultimate parent corporation as to have sole control over the Applicant.

Please find enclosed the list of entities and persons with direct and indirect interest in Columbus International, Inc. The attached list, if compared to the list already submitted to the Commission in Attachment # 2, includes additional details requested by, and provided to, the Department of Homeland Security.

The voting rights of entities with equity or ownership interest in Columbus International, Inc. are equivalent or proportional to the equity participation of the interest holder, thus I confirm that the ownership percentage used in Attachment # 2 of the pending Application are for both equity and voting interests.

Finally, please find below the information about Ironbound Holding Capital Limited (current corporate name Ironbound Island Capital) that certainly is missing in the narrative:

**Entity Name:** Ironbound Island Capital

**Address:** 757 Bedford Hwy  
Bedford Nova Scotia  
B4A 3Z7

**Percentage Held:** 47.5% through CFFI Holding SARL

**Citizenship:** Canadian.

**Principal Business:** Investment holding company.

**Involvement with Applicant:** Investor in the Columbus Group.

Please do not hesitate to contact me or Linda Wellstein directly with any other question. Thank you again for receiving me last week with such short notice, and for all your time and effort invested in this matter. We greatly appreciate it.

Sincerely,

Hector Mora

-----Original Message-----

*From:* David Krech [mailto:[David.Krech@fcc.gov](mailto:David.Krech@fcc.gov)]  
*Sent:* Tuesday, October 02, 2007 11:48 AM  
*To:* David Krech; Hector Mora  
*Cc:* George Li; Imani Ellis  
*Subject:* RE: CFX-1 Cable Landing Application - File No.  
SCL-LIC-20070516-00008

*I almost forgot, does any person or entity control Columbus International Inc.?*

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*From:* David Krech  
*Sent:* Tue 10/2/2007 10:53 AM  
*To:* David Krech; 'Hector Mora'  
*Cc:* George Li; Imani Ellis; Mikelle Morra  
*Subject:* RE: CFX-1 Cable Landing Application - File No.  
SCL-LIC-20070516-00008

*Mr. Mora,*

*We need some additional ownership information regarding the application.*

*In Attachment 2 you provide ownership information for Columbus Networks USA, Inc. Can you please verify that the ownership percentage used in the attachment are for both equity and voting interests or if not, please provide the separate voting and equity ownership interests. Also, please provide information regarding Ironbound Holdings Capital Limited, which is shown in Cart #2, but is not discussed in the narrative.*

*Thank you.*

*David Krech*

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*From:* David Krech

10/9/2007

Sent: Wed 9/26/2007 11:55 AM  
To: 'Hector Mora'  
Cc: George Li; Imani Ellis; Mikelle Morra  
Subject: RE: CFX-1 Cable Landing Application - File No.  
SCL-LIC-20070516-00008

Thank you for delivering the supplemental filing today. It was nice to meet you.

We have scanned the filing and placed it in the file for the application. It is available through IBFS.

We review the filing and let you know if we have any questions or need any further information in order to place the application on Public Notice.

David Krech

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From: Hector Mora [mailto:[hmora@wmr-intl-law.com](mailto:hmora@wmr-intl-law.com)]  
Sent: Friday, September 14, 2007 3:25 PM  
To: David Krech  
Subject: RE: CFX-1 Cable Landing Application - File No.  
SCL-LIC-20070516-00008

Mr. Krech,

I am writing to follow up on our client's application for a Cable Landing License. Our brief was submitted to the Secretary by certified mail and for that reason I do not have a stamped copy of the same. Nonetheless, I have confirmation of its delivery on September 4, 2007. I hope you received one of the copies of the brief already.

Please let me know if you received a paper copy of the brief or if I should contact the Secretary in that respect. I greatly appreciate any information you might provide us about the status of the application.

Sincerely,

Hector G. Mora

-----Original Message-----

From: David Krech [mailto:[David.Krech@fcc.gov](mailto:David.Krech@fcc.gov)]  
Sent: Friday, August 31, 2007 9:33 AM  
To: Hector Mora  
Cc: Imani Ellis; George Li; [lwellstein@wmr-intl-law.com](mailto:lwellstein@wmr-intl-law.com)  
Subject: RE: CFX-1 Cable Landing Application - File No.  
SCL-LIC-20070516-00008

Thank you.

Can you please e-mail us a PDF copy of the Secretary's date stamped version of the filing.

*We will review the filing and let you know if we have any questions or need any further information.*

*David Krech*

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*From: Hector Mora [mailto:[hmora@wmr-intl-law.com](mailto:hmora@wmr-intl-law.com)]*

*Sent: Thursday, August 30, 2007 7:08 PM*

*To: David Krech*

*Cc: Imani Ellis; George Li; [lwellstein@wmr-intl-law.com](mailto:lwellstein@wmr-intl-law.com)*

*Subject: CFX-1 Cable Landing Application - File No.*

*SCL-LIC-20070516-00008*

*Dear Mr. Krech;*

*On this date, we submitted to Ms. Marlene H. Dortch, Secretary of the Federal Communications Commission, the Applicant's brief in support of its request to operate the Submarine Cable System CFX-1 as a non common carrier. Please find enclosed a copy of the brief and cover letter as submitted.*

*I apologize for our delay in filing the aforementioned brief, but additional time was needed to provide factual support of the Applicant's eligibility to operate the cable system as a non common carrier. We believe that with this brief, the Applicant has completed all requisites for acceptance of its application for streamline processing.*

*Thank you very much for all your attention to this matter and guidance in getting the record complete. Please do not hesitate to contact me or Ms. Linda Wellstein, if additional information is needed.*

*Best regards,*

*Hector Mora*