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

In the Matter of )	
Application for a License to Construct, Land	
and Operate an Undersea Cable System	File No. SCL-LIC-2012
Linking the Continental United States, the	
Dominican Republic, Puerto Rico, Brazil,	
Colombia, Guatemala, and Mexico	
)	
América Móvil Submarine Cable System )	
)	

#### APPLICATION FOR SUBMARINE CABLE LANDING LICENSE

Latam Telecomunications, LLC ("Latam"), Puerto Rico Telephone Company, Inc. ("PRTC"), and Claro Chile, S.A. ("Claro Chile") (together, the "Applicants") pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (the "Cable Landing License Act"), Executive Order 10,530, and Section 1.767 of the Commission's rules, 47 C.F.R. § 1.767, hereby apply for a license to construct, land, and operate a fiber-optic submarine cable system, to be known as the América Móvil Submarine Cable System ("AMX1 System"), directly linking the continental United States, the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico.

## I. DESCRIPTION OF THE CABLE SYSTEM

The AMX1 System will be a high capacity digital fiber-optic cable system that will provide increased capacity from the continental United States to landing points in the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico. Specifically, the AMX1

System will have landing stations in Jacksonville and Miami, Florida and San Juan, Puerto Rico in the United States; Puerto Barrios in Guatemala; Barranquilla and Cartagena in Colombia; Fortaleza, Salvador de Bahia, and Rio de Janeiro in Brazil; Puerto Plata in the Dominican Republic; and Cancun in Mexico. The AMX1 System will initially be deployed with 40 Gigabits/sec wavelengths, but has a design to support a 100 Gigabits/sec wavelengths solution. The AMX1 System is based on repeatered technology using Wavelength Division Multiplexing ("WDM").

Construction of the new cable system, which will extend more than 17,500 kilometers, began on February 23, 2011; the studies to determine the route were finished in December 2011, and the manufacture of the cable and the equipment is ongoing. The completion target date is August 7, 2013. The life expectancy of the system is 25 years.

The AMX1 System will be owned by eight subsidiaries of América Móvil, S.A.B. de C.V. ("América Móvil"). Each party, except Claro Chile, will be responsible for operating the landing terminal equipment for the cable in its respective home service territory. The landing party for the cable in each jurisdiction will seek all required government approvals, permits, and licenses for AMX1 System operations from the relevant regulatory authorities. As described below, the parties are private corporations and will be subject to the regulatory requirements applicable to private corporations in each company's home location.

#### II. PUBLIC INTEREST STATEMENT

Grant of this application will serve the public interest, convenience and necessity because it will provide increased capacity from the United States to landing points in Mexico, the Caribbean, Central and South America to help meet the dramatic growth in IP, data and voice traffic. The AMX1 System will also increase competition for bandwidth, enhance service quality, and increase the resilience and redundancy of communications.

The AMX1 System will provide reliable high speed connectivity to international markets

and increase reliability of communications among América Móvil's users. This is a project of

high public interest, benefiting governments, business and domestic communications. The new

cable system will provide capacity necessary to meet the increasing demand for international

telecommunications traffic driven by the growing number of home and business broadband

users—and in particular to provide increased telecommunications bandwidth for the growing

demand for convergent telecommunications services.

Consumers will benefit from enhanced capacity for and reliability of services such as

telecommuting, HDTV broadcasting, Internet services, video conferencing, advanced

multimedia, and mobile video applications. Carriers and service providers will benefit from

increased physical route diversity, low-latency express path routing and expanded throughput

capability.

III. **INFORMATION REQUIRED BY 47 C.F.R. § 1.767** 

The information requested by 47 C.F.R. § 1.767(a)(1)-(3) and (8)-(9) of the

Commission's rules for each of the Applicants can be found in the attached appendices as

follows:

APPENDIX A: PRTC

APPENDIX B: Latam

APPENDIX C: Claro Chile

In addition, the information required by 47 C.F.R. § 1.767(a)(4)-(7) is provided below.

Information Required by 47 C.F.R. § 1.767(a)(4) through (7)

**(4) Description of the Cable** 

See Section I above.

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## (5) Landing Points

Information about the landing points of the AMX1 System is included as Appendix D.

## (6) Common Carrier or Non-Common Carrier Status

The AMX1 System will be operated on a non-common carrier basis. Non-common carrier status of the proposed system is consistent with established Commission policy and will advance the public interest. The Commission has authorized non-common carrier cables where:

(1) there is no legal compulsion to serve the public indifferently; and (2) there are no reasons implicit in the nature of the operations to expect that the Applicants would make capacity available to the public indifferently and indiscriminately.<sup>1</sup>

In applying the first prong of this test to submarine cable authorizations, the Commission has stated that there will be no legal compulsion to serve the public indifferently where there is no public interest reason to require facilities to be offered on a common carrier basis.<sup>2</sup> The Commission has focused this public interest analysis on whether an applicant will be able to exercise market power because of the lack of alternative facilities.<sup>3</sup> In this case, there are a variety of alternative facilities on existing cable and satellite systems between the continental United States and the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico. This region is served by other submarine cables including the Americas II, Antillas I, ARCOS-1, and MAYA-1 submarine cable systems. These facilities provide a variety of choices

See Cable & Wireless Order, 12 FCC Rcd 8516, 8520-23 (¶¶ 11-17) (1997); see also Optel Communications, Inc., Application for a license to land and operate in the United States a submarine cable extending between Canada and the United States, File No. SCL-92-004, Conditional Cable Landing License, 8 FCC Rcd 2267 (1993); National Association of Regulatory Utility Commissioners v. FCC, 525 F.2d 630, 642 (D.C. Cir.) (NARUC I), cert. denied, 425 U.S. 992 (1976).

<sup>&</sup>lt;sup>2</sup> See, e.g., Cable & Wireless Order, 12 FCC Rcd at 8522 (¶¶ 14-15).

 $<sup>^{3}</sup>$  Id.

for routing telecommunications traffic between the continental United States and the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico. All of these routing options will continue to be available when the Applicants' proposed AMX1 System is placed in operation. Moreover, this region receives satellite services from multiple satellites. Intelsat, SES, and Telesat all provide satellite services in the region.<sup>4</sup> The availability of multiple competitive alternatives to the proposed AMX1 System means that the Applicants would be unable to restrict output or raise prices without losing customers. Therefore, the Commission need not require the Applicants to serve the public indiscriminately.

In the second prong of the test, the Commission considers whether there is any reason implicit in the nature of the operations that the Applicants would make capacity available to the public indifferently. Here, the Applicants will allow other carriers to purchase capacity on the cable system to the extent this capacity is available; however, like many other similar cable systems, capacity will be made available to users on terms tailored to their particular needs. As such, the cable system will not be operated on a common carrier basis, and other users and carriers will not have any expectation that the system is a common carrier cable system.

#### (7) List of Proposed Owners

Each of the owners, other than Claro Chile, will own the landing station in its home country and the portion of the submarine cable from the home country to international waters. Claro Chile will own all of the submarine cable located in international waters. Only Latam, PRTC, and Claro Chile will either (1) own or control a landing station in the United States; or (2) own or control a five percent or greater interest in the cable system and use the U.S. points of the

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See Intelsat Satellite Coverage, available at http://www.intelsat.com/flash/coverage-maps/index.html; SES Satellite Coverage, available at http://www.ses.com/4232618/fleet-coverage; Telesat Satellite Coverage, available at http://www.telesat.com/satellite-fleet.

## cable system.<sup>5</sup>

Applicant	Landing station(s)	Percentage ownership
Latam	Jacksonville and Miami, Florida, United States	100% ownership in U.S. and in U.S. waters; 4.251% of total cable
Radiomovil Dipsa, S.A. de C.V. (Telcel)	Cancun, Mexico	100% ownership in Mexico and in Mexican waters; 1.085% of total cable
Telecomunicaciones de Guatemala, S.A. (Claro Guatemala)	Puerto Barrios, Guatemala	100% ownership in Guatemala and in Guatemalan waters; 1.059% of total cable
Comunciacion Celular, S.A. (Comcel)	Barranquilla and Cartagena, Colombia	100% ownership in Colombia and in Colombian waters; 2.850% of total cable
Compañía Dominicana de Telefonos, S.A.(Codetel)	Puerto Plata, Dominican Republic	100% ownership in the Dominican Republic and in Dominican Republic waters; 2.309% of the total cable
PRTC	San Juan, Puerto Rico	100% ownership in Puerto Rico and in Puerto Rican waters; 2.253% of the total cable
Claro S.A. (Claro Brasil)	Fortaleza, Rio de Janeiro, and Salvador de Bahia, Brazil	100% ownership in Brazil and in Brazilian waters; 3.776% of the total cable

<sup>47</sup> C.F.R. § 1.767(h) (defining who must be an applicant/licensee on a cable landing license). The Applicants note that AT&T owns the physical landing station in Miami, Florida. Latam, however, will own and have control of the U.S. end of the cable and all landing station equipment and functions relating to the AMX1 System at the Miami, Florida landing station. AT&T will have no control over the cable, and consequently could not ensure and certify that the AMX1 System is operating consistently with all of the standard conditions of a cable landing station license, such as compliance with requested non-common carrier status. Thus, requiring AT&T to be a licensee would not accomplish the Commission's intent to "ensure that entities having a significant ability to affect the operation of a cable system are applicants. . . ." *Review of Commission Consideration of Applications under the Cable Landing License Act*, Report and Order, 16 FCC Rcd 22167, ¶ 53 (2001). However, to the extent necessary, Applicants request a waiver of Section 1.767(h)(1) of the Commission's rules so that the Application can be processed and granted without AT&T being required to become a licensee for the AMX1 System.

Applicant	Landing station(s)	Percentage ownership
Claro Chile	None	100% of cable in international waters; 82.417% of the total cable

## IV. REQUEST FOR STREAMLINED PROCESSING

This application is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. 47 C.F.R. § 1.767(k). Each party's demonstration that it meets the eligibility requirements for streamlining is included in the attached appendices.

## V. CONCLUSION

As demonstrated above, the public interest, convenience and necessity will be served by a grant of this application to construct, land, and operate a fiber-optic submarine cable system. The Applicants respectfully request that the Commission grant this application.

## CERTIFICATE OF SERVICE

I, Pam Conley, do hereby certify that on March 30, 2012, I served a copy of the Application for a License to Construct, Land and Operate an Undersea Cable System Linking the United States, the Dominican Republic, Puerto Rico, Brazil, Colombia, Guatemala, and Mexico upon the following parties by U.S. first-class mail, postage prepaid:

Ambassador Philip Verveer U.S. Coordinator EB/CIP U.S. Department of State 2201 C Street, N.W. Washington, D.C. 20520-5818

Defense Information Systems Agency Code RGC 701 S. Courthouse Road Arlington, VA 22204 Kathy Smith
Office of Chief Counsel/NTIA
U.S. Department of Commerce
14<sup>th</sup> Street and Constitution Ave., N.W.
Washington, D.C. 20230

Pam Conley

## APPENDIX A – Puerto Rico Telephone Company, Inc. ("PRTC")

## **INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)**

## (1) Name, Address and Telephone Number of the Applicant

Puerto Rico Telephone Company, Inc. 1515 FD Roosevelt Avenue, 12th Floor Guaynabo, PR 00921 (787) 792-9510

## (2) Place of Formation

PRTC is a corporation organized under the laws of the Commonwealth of Puerto Rico.

## (3) Correspondence concerning the application should be sent to the following:

## Company Contact:

Walter Arroyo Puerto Rico Telephone Company, Inc. 1515 FD Roosevelt Avenue, 12th Floor

Guaynabo, PR 00921 Tel: (787) 792-9510 Fax: (787) 793-7650

Email: warroyo@claropr.com

#### Legal Counsel

Nancy J. Victory Wiley Rein LLP 1776 K Street, NW Washington, DC 20006

Tel: (202) 719-7344 Fax: (202) 719-7049

Email: nvictory@wileyrein.com

# (4) Certification and Ownership Information Requested by Sections 63.18(h)-(k) and (o) of the Commission's Rules

## <u>Information requested by Section 63.18(h):</u>

## **Ownership:**

The name, address, citizenship, and principal business of each of PRTC's ten percent or greater interest holders are:

Telecomunicaciones de Puerto Rico, Inc. ("TELPRI") 1515 FD Roosevelt Avenue, 12th Floor

Citizenship: United States (Puerto Rico)

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 100% direct interest in PRTC.

Tenedora Telpri, S.A. de C.V. ("Tenedora")

Lago Zurich No. 245, Plaza Carso-Edificio Telcel,

Colonia Granada Ampliación, C.P.

11529, México, D.F. Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 100% direct interest in TELPRI.

Radiomóvil Dipsa, S.A. de C.V. ("Telcel")

Lago Zurich No. 245, Plaza Carso-Edificio Telcel,

Colonia Granada Ampliación, C.P.

11529, México, D.F. Citizenship: Mexico

Principal Business: Telecommunications company Ownership Interest: 99.99% direct interest in Tenedora.

Sercotel, S.A. de C.V. ("Sercotel")

Lago Zurich No. 245, Plaza Carso-Edificio Telcel,

Colonia Granada Ampliación, C.P.

11529, México, D.F. Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 99.9% direct interest in Telcel.

América Móvil, S.A.B. de C.V.

Lago Zurich No. 245, Plaza Carso-Edificio Telcel,

Colonia Granada Ampliación, C.P.

11529, México, D.F. Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments Ownership Interest: Holding company for telecommunications-related investments Ownership Interest: 100% interest in Sercotel. Based on the most recent publicly available information, the Slim family holds directly and indirectly 42.43% of the equity and 65.52% of the voting stock in América Móvil. Other Mexican and foreign investors

América Móvil owns directly 99.99% of Sercotel. The remaining 0.01% is held by Amov IV, S.A. de C.V., a wholly owned subsidiary of América Móvil.

<sup>21.93%</sup> of the equity (approximately 45.04% of the voting stock) of América Móvil is owned directly and indirectly, including beneficially owned, through a trust for the benefit of Carlos Slim Helú and certain members of his family, all of whom are Mexican citizens. Inmobiliaria Carso, S.A. de C.V. (a non-public holding company wholly owned by the Slim family and duly organized under Mexican laws) also owns shares of América Móvil that represent less than ten percent of the voting shares of América Móvil. In addition, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity owns ten

hold the remaining equity and voting stock of América Móvil. No public investor holds more than 10% of América Móvil's capital stock.

## **Interlocking Directorates**

The following members of PRTC's board of directors are also members of the board of directors of other subsidiaries of América Móvil that are foreign carriers: Daniel Hajj Aboumrad ("DHA"), Carlos Cárdenas Blásquez ("CCB"), Alejandro Cantú Jiménez ("ACJ"), and Carlos José García Moreno Elizondo ("CGM"). Specific information regarding the foreign carriers on which each of these individuals serves as a member of the board of directors is provided in the following chart:

Foreign Carrier	Country in Which Carrier Provides Telecommunications Services	DHA	ССВ	ACJ	CGM
AMX Argentina, S.A.	Argentina			X	
Ertach, S.A.	Argentina			X	
Telmex Argentina, S.A.	Argentina			X	
Americel, S.A.	Brazil	X	X	X	X
Claro, S.A.	Brazil	X	X	X	X
Claro Chile, S.A.	Chile	X	X	X	X
Telmex Colombia S.A.	Colombia		X	X	X
Infracel, S.A.	Colombia		X	X	X
Claro CR Telecomunicaciones, S.A.	Costa Rica		X	X	
Compañía Dominicana de Teléfonos S.A.	Dominican Republic	X	X	X	
Consorcio Ecuatoriano de Telecomunicaciones, S.A. (CONECEL)	Ecuador		X	X	X

percent or more of the voting shares of América Móvil. Collectively, members of the Slim family, the Slim family trust, and Inmobiliaria Carso hold 42.43% of the equity and 65.52% of the voting stock in América Móvil.

In addition, AT&T Inc. ("AT&T") (formerly known as SBC International, Inc.), a widely and publicly held corporation incorporated under the laws of the state of Delaware, holds approximately 9.11% of the equity (approximately 24.5% of the voting stock) of América Móvil through AA shares. Based on beneficial ownership reports filed with the U.S. Securities and Exchange Commission ("SEC") on March 1, 2011, AT&T also owned approximately 752 million L shares. As of April 30, 2011, 38.7% of the outstanding L shares of América Móvil were represented by L Share ADSs, each representing the right to receive 20 L shares, and 99.3% of the L Share ADSs were held by registered holders with addresses in the United States. 33.7% of the A Share ADSs were held by registered holders with addresses in the United States.

Foreign Carrier	Country in Which Carrier Provides Telecommunications Services	DHA	ССВ	ACJ	CGM
Compañía de Telecomunicaciones de El Salvador, S.A. de C.V. (CTE)	El Salvador	X	X	X	X
CTE Telecom Personal, S.A. de C.V.	El Salvador		X	X	X
Telecomunicaciones de Guatemala, S.A.	Guatemala	X	X	X	X
Servicios de Comunicaciones de Honduras, S.A. de C.V.	Honduras	X	X	X	X
Radiomóvil Dipsa, S.A. de C.V.	México	X	X	X	X
Empresa Nicaraguense de Telecomunicaciones, S.A. (ENITEL)	Nicaragua	X	X	X	
Claro Panamá, S.A.	Panamá				
América Móvil Perú, S.A.C.	Perú	X	X	X	X
AM Wireless Uruguay, S.A.	Uruguay	X			
Telstar, S.A.	Uruguay	X			

## <u>Information requested by Section 63.18(i):</u>

PRTC is not a foreign carrier, as that term is defined by Section 63.09 of the Commission's rules. Through its ownership by América Móvil, PRTC is affiliated with the following foreign carriers:

NAME OF THE AFFILIATED CARRIER	COUNTRY IN WHICH CARRIER AUTHORIZED TO PROVIDE TELECOMMUNICATIONS SERVICES
TELMEX ARGENTINA S.A.	ARGENTINA
ERTACH S.A.	ARGENTINA
AMX ARGENTINA S.A.	ARGENTINA
EMPRESA BRASILEIRA DE TELECOMUNICACOES S.A. (EMBRATEL)	BRAZIL
AMERICEL, S.A.	BRAZIL
CLARO, S.A.	BRAZIL
CLARO 155, S.A.	CHILE
CLARO CHILE S.A.	CHILE
CLARO 110 S.A.	CHILE
TELMEX COLOMBIA S.A.	COLOMBIA
INFRACEL, S.A. E.S.P.	COLOMBIA
CLARO CR TELECOMUNICACIONES S.A.	COSTA RICA
COMPAÑÍA DOMINICANA DE TELEFONOS S.A.	DOMINICAN REPUBLIC

NAME OF THE AFFILIATED CARRIER	COUNTRY IN WHICH CARRIER AUTHORIZED TO PROVIDE TELECOMMUNICATIONS SERVICES
ECUADOR TELECOM S.A.	ECUADOR
CONSORCIO ECUATORIANO DE TELECOMUNICACIONES, S.A.	ECUADOR
COMPAÑÍA DE TELECOMUNICACIONES DE EL SALVADOR, S.A. DE C.V.	EL SALVADOR
PUBLITEL, S.A. DE C.V.	EL SALVADOR
CTE TELECOM PERSONAL, S.A. DE C.V.	EL SALVADOR
TELECOMUNICACIONES DE GUATEMALA, S.A.	GUATEMALA
CABLENET, S.A. (GUATEMALA)	GUATEMALA
SERVICIOS DE COMUNICACIONES DE HONDURAS, S.A. DE C.V.	HONDURAS
AMOV TELECOM, S.A. DE C.V.	HONDURAS
RADIOMOVIL DIPSA, S.A DE C.V.	MEXICO
EMPRESA NICARAGUENSE DE TELECOMUNICACIONES, S.A.	NICARAGUA
CLARO PANAMA S.A.	PANAMA
TELMEX PERÚ, S.A.	PERU
AMÉRICA MÓVIL PERÚ S.A.C.	PERU
TELSTAR S.A.	URUGUAY
AM WIRELESS URUGUAY S.A.	URUGUAY

## <u>Information requested by Section 63.18(j):</u>

Through its ownership by América Móvil, PRTC is affiliated with foreign carriers in all of the AMX1 System's destination countries: Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico.

## <u>Information requested by Section 63.18(k):</u>

Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico are members of the WTO.

## <u>Information requested by Section 63.18(o):</u>

PRTC certifies pursuant to sections 1.2001 through 1.2003 of the Commission's Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

# (5) Routine Conditions Specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

PRTC certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

## ELIGIBILITY FOR STREAMLINED PROCESSING – 47 C.F.R. § 1.767(k)

PRTC certifies that it is affiliated with a foreign carrier in each of the AMX1 System's destination markets: Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico. Each of these countries is a WTO Member country.

PRTC's foreign carrier affiliates in Colombia, Telmex Colombia and Infracel, S.A. E.S.P. ("Infracel"), lack market power in Colombia. The Commission has previously reviewed Telmex Colombia, S.A. and did not find that this carrier is dominant in Colombia. Moreover, Infracel qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3). Infracel is authorized to provide international long distance services. The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.–Colombia route, including the international transport and local access markets. The company is not listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.

PRTC is considered dominant with respect to the U.S.-Mexico, U.S.-Brazil, U.S.-Guatemala, and U.S.-Dominican Republic routes.<sup>5</sup> For each of these routes, PRTC agrees to accept and abide by the reporting requirements in Section 1.767(l) of the Commission's rules, 47 C.F.R. § 1.767(l).

In addition, pursuant to 47 C.F.R. § 1.767(k)(4), PRTC certifies that the AMX1 System will not be located in any states where the cable landing licenses may be subject to the consistency certification requirements of the Coastal Zone Management Act, 16 U.S.C. § 1456.

<sup>&</sup>lt;sup>3</sup> Verizon Communications Inc. and América Móvil, S.A. de C.V. Application for Authority to Transfer Control of Telecomunicaciones de Puerto Rico, Inc., Memorandum Opinion and Order and Declaratory Ruling, 22 FCC Rcd 6195, 6215 (¶ 45) (2007) (finding that América Móvil affiliates were dominant only on the U.S.-Mexico, U.S.-Brazil, U.S.-Guatemala, and U.S.-Dominican Republic routes).

The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Public Notice, DA 07-233 (Jan. 26, 2007).

<sup>5</sup> See supra note 3.

## Certification

I am authorized to enter this certification on behalf of PRTC.

All of the information contained in this application and Appendix A is true and correct to the

best of my knowledge and belief.

By:

Mario Barrera

Chief Operating Officer

1515 FD Roosevelt Avenue, 12th Floor

Guaynabo, PR 00921 Tel: (787) 792-9510

For and on behalf of Puerto Rico Telephone Company, Inc. ("PRTC")

Dated: 3/29/12

## APPENDIX B – Latam Telecomunications, LLC ("Latam")

## INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)

#### **(1)** Name, Address and Telephone Number of the Applicant

Latam Telecomunications, LLC TracFone Building, 9700 NW 112th Avenue Miami, Florida 33178 Business: 305-418-3484

#### **(2) Place of Formation**

Latam is a corporation organized under the laws of the state of Delaware.

#### **(3)** Correspondence concerning the application should be sent to the following:

## **Company Contact:**

Arturo Pellerano

Treasurer

Latam Telecomunications, LLC

TracFone Building, 9700 NW 112th Avenue

Miami, Florida 33178 Tel: (305) 418-3484 Fax: (954) 416-6699

arturo.pellerano@seccionamarilla.com

## Legal Counsel

Nancy J. Victory Wiley Rein LLP 1776 K Street, NW Washington, DC 20006

Tel: (202) 719-7344 Fax: (202) 719-7049

Email: nvictory@wileyrein.com

#### **(4)** Certification and Ownership Information Requested by Sections 63.18(h)-(k) and (o) of the Commission's Rules

## <u>Information requested by Section 63.18(h):</u>

#### **Ownership:**

The name, address, citizenship, and principal business of each of Latam's ten percent or greater interest holders are:

Sercotel, S.A. de C.V. ("Sercotel")

Lago Zurich No. 245, Plaza Carso-Edificio Telcel, Colonia Granada Ampliación

11529, México, D.F. Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 100% direct interest in Latam.

América Móvil, S.A.B. de C.V. Lago Zurich No. 245, Plaza Carso-Edificio Telcel, Colonia Granada Ampliación, C.P. 11529, México, D.F.

Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments Ownership Interest: 100% interest in Sercotel.<sup>1</sup> Based on the most recent publicly available information, the Slim family holds directly and indirectly 42.43% of the equity and 65.52% of the voting stock in América Móvil.<sup>2</sup> Other Mexican and foreign investors hold the remaining equity and voting stock of América Móvil. No public investor holds more than 10% of América Móvil's capital stock.

In addition, AT&T Inc. ("AT&T") (formerly known as SBC International, Inc.), a widely and publicly held corporation incorporated under the laws of the state of Delaware, holds approximately 9.11% of the equity (approximately 24.5% of the voting stock) of América Móvil through AA shares. Based on beneficial ownership reports filed with the U.S. Securities and Exchange Commission ("SEC") on March 1, 2011, AT&T also owned approximately 752 million L shares. As of April 30, 2011, 38.7% of the outstanding L shares of América Móvil were represented by L Share ADSs, each representing the right to receive 20 L shares, and 99.3% of the L Share ADSs were held by registered holders with addresses in the United States. 33.7% of the A shares were held in the form of A Share ADSs, each representing the right to receive 20 A shares, and 99.5% of the A Share ADSs were held by registered holders with addresses in the United States.

América Móvil owns directly 99.99% of Sercotel. The remaining 0.01% is held by Amov IV, S.A. de C.V., a wholly owned subsidiary of América Móvil.

<sup>21.93%</sup> of the equity (approximately 45.04% of the voting stock) of América Móvil is owned directly and indirectly, including beneficially owned, through a trust for the benefit of Carlos Slim Helú and certain members of his family, all of whom are Mexican citizens. Inmobiliaria Carso, S.A. de C.V. (a non-public holding company wholly owned by the Slim family and duly organized under Mexican laws) also owns shares of América Móvil that represent less than ten percent of the voting shares of América Móvil. In addition, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity owns ten percent or more of the voting shares of América Móvil. Collectively, members of the Slim family, the Slim family trust, and Inmobiliaria Carso hold 42.43% of the equity and 65.52% of the voting stock in América Móvil.

## **Interlocking Directorates**

Latam has no interlocking directorates with a foreign carrier.

## **Information requested by Section 63.18(i):**

Latam is not a foreign carrier, as that term is defined by Section 63.09 of the Commission's rules. Through its ownership by América Móvil, Latam is affiliated with the following foreign carriers:

	TELECOMMUNICATIONS SERVICES
TELMEX ARGENTINA S.A.	ARGENTINA
ERTACH S.A.	ARGENTINA
AMX ARGENTINA S.A.	ARGENTINA
EMPRESA BRASILEIRA DE TELECOMUNICACOES S.A. (EMBRATEL)	BRAZIL
AMERICEL, S.A.	BRAZIL
CLARO, S.A.	BRAZIL
CLARO 155, S.A.	CHILE
CLARO CHILE S.A.	CHILE
CLARO 110 S.A.	CHILE
TELMEX COLOMBIA S.A.	COLOMBIA
INFRACEL, S.A. E.S.P.	COLOMBIA
CLARO CR TELECOMUNICACIONES S.A.	COSTA RICA
COMPAÑÍA DOMINICANA DE TELEFONOS S.A.	DOMINICAN REPUBLIC
ECUADOR TELECOM S.A.	ECUADOR
CONSORCIO ECUATORIANO DE TELECOMUNICACIONES, S.A.	ECUADOR
COMPAÑÍA DE TELECOMUNICACIONES DE EL SALVADOR, S.A. DE C.V.	EL SALVADOR
PUBLITEL, S.A. DE C.V.	EL SALVADOR
CTE TELECOM PERSONAL, S.A. DE C.V.	EL SALVADOR
TELECOMUNICACIONES DE GUATEMALA, S.A.	GUATEMALA
CABLENET, S.A. (GUATEMALA)	GUATEMALA
SERVICIOS DE COMUNICACIONES DE HONDURAS, S.A. DE C.V.	HONDURAS
AMOV TELECOM, S.A. DE C.V.	HONDURAS
RADIOMOVIL DIPSA, S.A DE C.V.	MEXICO
EMPRESA NICARAGUENSE DE TELECOMUNICACIONES, S.A.	NICARAGUA
CLARO PANAMA S.A.	PANAMA
TELMEX PERÚ, S.A.	PERU
AMÉRICA MÓVIL PERÚ S.A.C.	PERU

NAME OF THE AFFILIATED CARRIER	COUNTRY IN WHICH CARRIER AUTHORIZED TO PROVIDE TELECOMMUNICATIONS SERVICES
TELSTAR S.A.	URUGUAY
AM WIRELESS URUGUAY S.A.	URUGUAY

#### **Information requested by Section 63.18(j):**

Through its ownership by América Móvil, Latam is affiliated with foreign carriers in all of the AMX1 System's destination countries: Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico.

#### <u>Information requested by Section 63.18(k):</u>

Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico are members of the WTO.

## <u>Information requested by Section 63.18(o):</u>

Latam certifies pursuant to sections 1.2001 through 1.2003 of the Commission's Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(5) Routine Conditions Specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

Latam certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

#### ELIGIBILITY FOR STREAMLINED PROCESSING – 47 C.F.R. § 1.767(k)

Latam certifies that it is affiliated with a foreign carrier in each of the AMX1 System's destination markets: Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico. Each of these countries is a WTO Member country.

Latam's foreign carrier affiliates in Colombia, Telmex Colombia and Infracel, S.A. E.S.P. ("Infracel"), lack market power in Colombia. The Commission has previously reviewed Telmex Colombia, S.A. and did not find that this carrier is dominant in Colombia.<sup>3</sup> Moreover,

<sup>&</sup>lt;sup>3</sup> Verizon Communications Inc. and América Móvil, S.A. de C.V. Application for Authority to Transfer Control of Telecomunicaciones de Puerto Rico, Inc., Memorandum Opinion and Order and Declaratory Ruling, 22 FCC Rcd 6195, 6215 (¶ 45) (2007) (finding that América

Infracel qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3). Infracel is authorized to provide international long distance services. The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.—Colombia route, including the international transport and local access markets. The company is not listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.<sup>4</sup>

Latam is considered dominant with respect to the U.S.-Mexico, U.S.-Brazil, U.S.-Guatemala, and U.S.-Dominican Republic routes.<sup>5</sup> For each of these routes, Latam agrees to accept and abide by the reporting requirements in Section 1.767(l) of the Commission's rules, 47 C.F.R. § 1.767(l).

In addition, pursuant to 47 C.F.R. § 1.767(k)(4), Latam certifies that the AMX1 System will not be located in any states where the cable landing licenses may be subject to the consistency certification requirements of the Coastal Zone Management Act, 16 U.S.C. § 1456.

Móvil affiliates were dominant only on the U.S.-Mexico, U.S.-Brazil, U.S.-Guatemala, and U.S.-Dominican Republic routes).

The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Public Notice, DA 07-233 (Jan. 26, 2007).

<sup>5</sup> See supra note 3.

## Certification

I am authorized to enter this certification on behalf of Latam.

All of the information contained in this application and Appendix B is true and correct to the best of my knowledge and belief.

Arturo Pellerano

Treasurer

TracFone Building 9700 NW 112th Avenue Miami, Florida 33178

Tel: (305) 418-3484 Fax: (954) 416-6699

arturo.pellerano@seccionamarilla.com

For and on behalf of Latam Telecomunications, LLC ("Latam")

Dated: 3-29-2012

## <u>APPENDIX C – Claro Chile, S.A. ("Claro Chile")</u>

## **INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)**

## (1) Name, Address and Telephone Number of the Applicant

Claro Chile, S.A. Rinconada El salto 202, Huechuraba Santiago, Chile

## (2) Place of Formation

Claro Chile is a corporation organized under the laws of Chile.

## (3) Correspondence concerning the application should be sent to the following:

## Company Contact:

Gianpaolo Peirano

Rinconada El Salto 202 Huechuraba

Tel: 562-5825261

Email: gianpaolo.peirano@clarochile.cl

#### Legal Counsel

Nancy J. Victory

Wiley Rein LLP

1776 K Street NW

Washington, DC 20006

Tel: (202) 719-7344 Fax: (202) 719-7049

Email: nvictory@wileyrein.com

## (4) Certification and Ownership Information Requested by Sections 63.18(h)-(k) and (o) of the Commission's Rules

## <u>Information requested by Section 63.18(h):</u>

## **Ownership:**

The name, address, citizenship, and principal business of each of Claro Chile's ten percent or greater interest holders are:

Sercotel, S.A. de C.V. ("Sercotel") Lago Zurich No. 245, Plaza Carso-Edificio Telcel, Colonia Granada Ampliación 11529, México, D.F. Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments

Ownership Interest: 99.0% direct interest in Claro Chile.

América Móvil, S.A.B. de C.V. Lago Zurich No. 245, Plaza Carso-Edificio Telcel, Colonia Granada Ampliación, C.P. 11529, México, D.F.

Citizenship: Mexico

Principal Business: Holding company for telecommunications-related investments Ownership Interest: 100% interest in Sercotel.<sup>2</sup> Based on the most recent publicly available information, the Slim family holds directly and indirectly 42.43% of the equity and 65.52% of the voting stock in América Móvil.<sup>3</sup> Other Mexican and foreign investors hold the remaining equity and voting stock of América Móvil. No public investor holds more than 10% of América Móvil's capital stock.

Secortel owns directly 99.00% of Claro Chile. The remaining 1.00% is held by Amov IV, S.A. de C.V., a wholly owned subsidiary of América Móvil.

In addition, AT&T Inc. ("AT&T") (formerly known as SBC International, Inc.), a widely and publicly held corporation incorporated under the laws of the state of Delaware, holds approximately 9.11% of the equity (approximately 24.5% of the voting stock) of América Móvil through AA shares. Based on beneficial ownership reports filed with the U.S. Securities and Exchange Commission ("SEC") on March 1, 2011, AT&T also owned approximately 752 million L shares. As of April 30, 2011, 38.7% of the outstanding L shares of América Móvil were represented by L Share ADSs, each representing the right to receive 20 L shares, and 99.3% of the L Share ADSs were held by registered holders with addresses in the United States. 33.7% of the A shares were held in the form of A Share ADSs, each representing the right to receive 20 A shares, and 99.5% of the A Share ADSs were held by registered holders with addresses in the United States.

América Móvil owns directly 99.99% of Sercotel. The remaining 0.01% is held by Amov IV, S.A. de C.V., a wholly owned subsidiary of América Móvil.

<sup>21.93%</sup> of the equity (approximately 45.04% of the voting stock) of América Móvil is owned directly and indirectly, including beneficially owned, through a trust for the benefit of Carlos Slim Helú and certain members of his family, all of whom are Mexican citizens. Inmobiliaria Carso, S.A. de C.V. (a non-public holding company wholly owned by the Slim family and duly organized under Mexican laws) also owns shares of América Móvil that represent less than ten percent of the voting shares of América Móvil. In addition, Carlos Slim Helú and members of his family individually own shares of América Móvil, though none in his or her individual capacity owns ten percent or more of the voting shares of América Móvil. Collectively, members of the Slim family, the Slim family trust, and Inmobiliaria Carso hold 42.43% of the equity and 65.52% of the voting stock in América Móvil.

## **Interlocking Directorates**

The following members of Claro Chile's board of directors are also members of the board of directors of other subsidiaries of América Móvil that are foreign carriers: Alejandro Cantú Jiménez ("ACJ"), Daniel Hajj Aboumrad ("DHA"), Salvador Cortes Gómez ("SCG"), Oscar Von Hauske Solís ("OVHS"), and Carlos Cárdenas Blásquez ("CCB"). Specific information regarding the foreign carriers on which each of these individuals serves as a member of the board of directors is provided in the following chart:

	Country in Which Carrier Provides Telecommunications					
Foreign Carrier	Services	ACJ	DHA	SCG	OVHS	ССВ
AMX Argentina, S.A.	Argentina	X				
Ertach, S.A.	Argentina	X				
Telmex Argentina, S.A.	Argentina	X				
Americel, S.A.	Brazil	X	X			
Claro, S.A.	Brazil	X	X			
Embratel	Brazil				X	
Telmex Colombia, S.A.	Colombia	X				X
Infracel, S.A.	Colombia	X		X		X
Claro CR Telecomunicaciones, S.A.	Costa Rica	X				X
Compañía Dominicana de Teléfonos S.A.	Dominican Republic	X	X			X
Consorcio Ecuatoriano de Telecomunicaciones, S.A. (CONECEL)	Ecuador	X				X
Compañía de Telecomunicaciones de El Salvador, S.A. de C.V. (CTE)	El Salvador	X	X			X
CTE Telecom Personal, S.A. de C.V.	El Salvador	X				X
Telecomunicaciones de Guatemala, S.A.	Guatemala	X	X			X
Servicios de Comunicaciones de Honduras, S.A. de C.V.	Honduras	X	X			X
Radiomóvil Dipsa, S.A. de C.V.	México	X	X			X
Empresa Nicaraguense de Telecomunicaciones, S.A. (ENITEL)	Nicaragua	X	X			X
América Móvil Perú, S.A.C.	Perú	X	X			X
Telmex Perú S.A.	Perú				X	
Puerto Rico Telephone Company, Inc.	Puerto Rico	X	X			X
AM Wireless Uruguay, S.A.	Uruguay		X			
Telstar, S.A.	Uruguay		X			

## **Information requested by Section 63.18(i):**

Claro Chile is a foreign carrier, as that term is defined by Section 63.09 of the Commission's rules. Through its ownership by América Móvil, , Claro Chile also is affiliated with the following foreign carriers:

NAME OF THE AFFILIATED CARRIER	COUNTRY IN WHICH CARRIER AUTHORIZED TO PROVIDE TELECOMMUNICATIONS SERVICES
TELMEX ARGENTINA S.A.	ARGENTINA
ERTACH S.A.	ARGENTINA
AMX ARGENTINA S.A.	ARGENTINA
EMPRESA BRASILEIRA DE TELECOMUNICACOES S.A. (EMBRATEL)	BRAZIL
AMERICEL, S.A.	BRAZIL
CLARO, S.A.	BRAZIL
CLARO 155, S.A.	CHILE
CLARO 110 S.A.	CHILE
TELMEX COLOMBIA S.A.	COLOMBIA
INFRACEL, S.A. E.S.P.	COLOMBIA
CLARO CR TELECOMUNICACIONES S.A.	COSTA RICA
COMPAÑÍA DOMINICANA DE TELEFONOS S.A.	DOMINICAN REPUBLIC
ECUADOR TELECOM S.A.	ECUADOR
CONSORCIO ECUATORIANO DE TELECOMUNICACIONES, S.A.	ECUADOR
COMPAÑÍA DE TELECOMUNICACIONES DE EL SALVADOR, S.A. DE C.V.	EL SALVADOR
PUBLITEL, S.A. DE C.V.	EL SALVADOR
CTE TELECOM PERSONAL, S.A. DE C.V.	EL SALVADOR
TELECOMUNICACIONES DE GUATEMALA, S.A.	GUATEMALA
CABLENET, S.A. (GUATEMALA)	GUATEMALA
SERVICIOS DE COMUNICACIONES DE HONDURAS, S.A. DE C.V.	HONDURAS
AMOV TELECOM, S.A. DE C.V.	HONDURAS
RADIOMOVIL DIPSA, S.A DE C.V.	MEXICO
EMPRESA NICARAGUENSE DE TELECOMUNICACIONES, S.A.	NICARAGUA
CLARO PANAMA S.A.	PANAMA
TELMEX PERÚ, S.A.	PERU
AMÉRICA MÓVIL PERÚ S.A.C.	PERU
TELSTAR S.A.	URUGUAY
AM WIRELESS URUGUAY S.A.	URUGUAY

## Information requested by Section 63.18(j):

Through its ownership by América Móvil, Claro Chile is affiliated with foreign carriers in all of the AMX1 System's destination countries: Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico.

## **Information requested by Section 63.18(k):**

Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico are members of the WTO.

#### **Information requested by Section 63.18(0):**

Claro Chile certifies pursuant to sections 1.2001 through 1.2003 of the Commission's Rules that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(5) Routine Conditions Specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

Claro Chile certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's Rules, 47 C.F.R. § 1.767(g).

## ELIGIBILITY FOR STREAMLINED PROCESSING – 47 C.F.R. § 1.767(k)

Claro Chile certifies that it is a foreign carrier and is affiliated with a foreign carrier in each of the AMX1 System's destination markets: Brazil, Colombia, the Dominican Republic, Guatemala, and Mexico. Each of these countries is a WTO Member country.

Claro Chile lacks market power in its home market, Chile. Claro Chile operates a mobile wireless system in Chile. Claro Chile lacks 50 percent market share in the international transport and local access markets in Chile. Moreover, the Commission has previously determined that wireless service providers lack sufficient market power to affect competition adversely in the U.S. market.<sup>4</sup>

Claro Chile's foreign carrier affiliates in Colombia, Telmex Colombia and Infracel, S.A. E.S.P. ("Infracel"), lack market power in Colombia. The Commission has previously reviewed Telmex Colombia, S.A. and did not find that this carrier is dominant in Colombia. Moreover,

In re 1998 Biennial Regulatory Review – Review of International Common Carrier Regulations, Report and Order, 14 FCC Rcd 4909, 4922 (¶ 29) (1999).

Verizon Communications Inc. and América Móvil, S.A. de C.V. Application for Authority to Transfer Control of Telecomunicaciones de Puerto Rico, Inc., Memorandum Opinion and Order and Declaratory Ruling, 22 FCC Rcd 6195, 6215 (¶ 45) (2007) (finding that América Móvil affiliates were dominant only on the U.S.-Mexico, U.S.-Brazil, U.S.-Guatemala, and U.S.-Dominican Republic routes).

Infracel qualifies for a presumption of non-dominance under Section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3). Infracel is authorized to provide international long distance services. The company does not control bottleneck facilities and has market shares under 50 percent in all relevant markets on the foreign end of the U.S.—Colombia route, including the international transport and local access markets. The company is not listed on the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets.<sup>6</sup>

Claro Chile is considered dominant with respect to the U.S.-Mexico, U.S.-Brazil, U.S.-Guatemala, and U.S.-Dominican Republic routes. For each of these routes, Claro Chile agrees to accept and abide by the reporting requirements in Section 1.767(1) of the Commission's rules, 47 C.F.R. § 1.767(1).

In addition, pursuant to 47 C.F.R. § 1.767(k)(4), Claro Chile certifies that the AMX1 System will not be located in any states where the cable landing licenses may be subject to the consistency certification requirements of the Coastal Zone Management Act, 16 U.S.C. § 1456.

The International Bureau Revises and Reissues the Commission's List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets, Public Notice, DA 07-233 (Jan. 26, 2007).

<sup>&</sup>lt;sup>7</sup> See supra note 5.

## Certification

I am authorized to enter this certification on behalf of Claro Chile.

All of the information contained in this application and Appendix C is true and correct to the best of my knowledge and belief.

By:

Gerardo Muñoz Lozano

General Manager

Rinconada El Salto 4001

For and on behalf of Claro Chile, S.A. ("Claro Chile")

Dated:

## <u>APPENDIX D – LANDING STATION INFORMATION</u>

• TAB 1: Jacksonville, Florida Landing Station

• TAB 2: Miami, Florida Landing Station

• TAB 3: San Juan, Puerto Rico Landing Station

• TAB 4: Puerto Plata, Dominican Republic Landing Station

• TAB 5: Salvador de Bahía, Brazil Landing Station

• TAB 6: Rio de Janeiro, Brazil Landing Station

• TAB 7: Fortaleza, Brazil Landing Station

• TAB 8: Baranquilla, Colombia Landing Station

• TAB 9: Cartagena, Colombia Landing Station

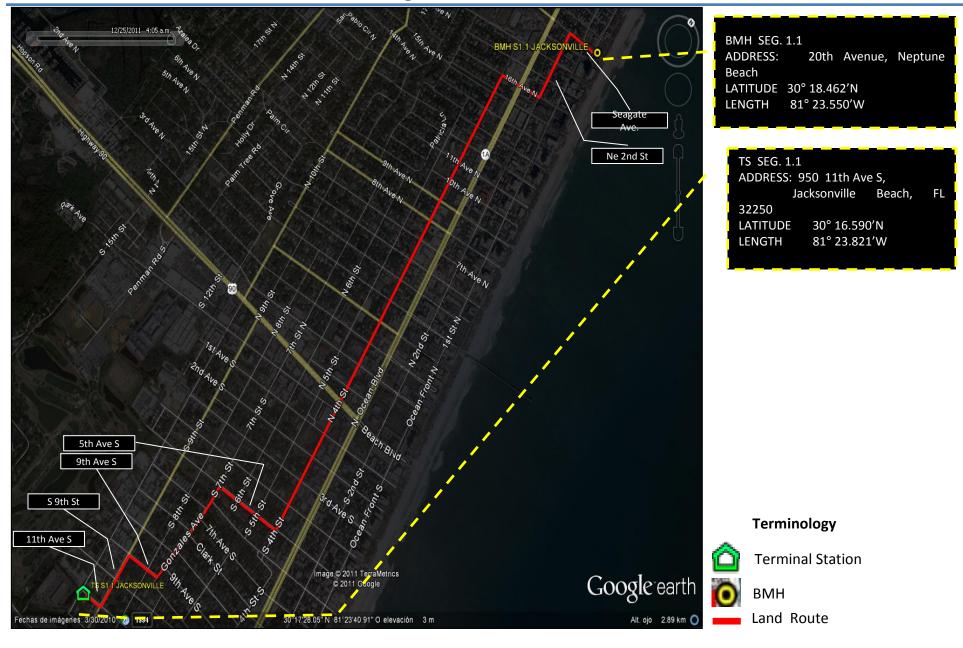
• TAB 10: Puerto Barrios, Guatemala Landing Station

• TAB 11: Cancún, Mexico Landing Station

<b>TAB 1:</b>	Jacksonville	, Florida L	anding Stat	ion

## **JACKSONVILLE**

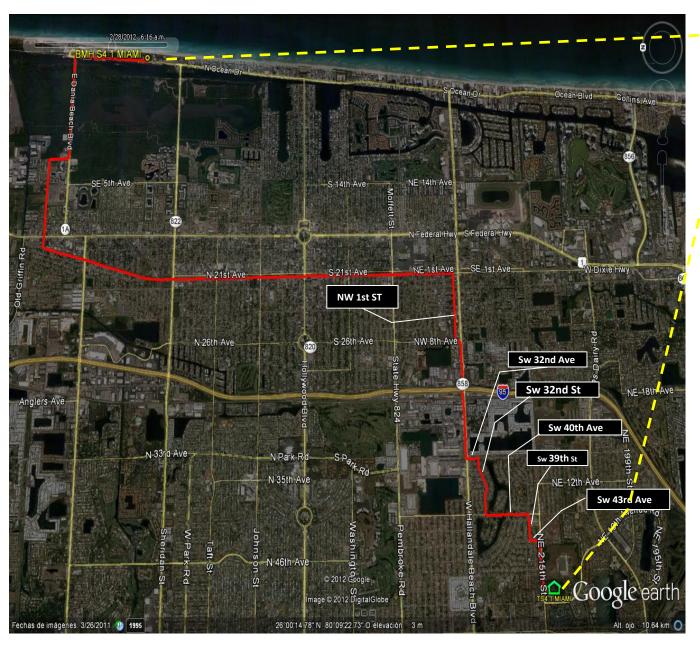
## Segment 1.1



# TAB 2: Miami, Florida Landing Station

## **MIAMI**

## Segment 4.1



BMH SEG. 4.1

ADDRESS: AT&T BMH, North Beach

LATITUDE 26° 02.412'N LENGHT 80° 06.870'W

TS SEG. 4.1

ADDRESS: AT&T Miami

460 Northeast 215th Street

Miami, Florida 33179

LATITUDE 25° 58.3313′N LENGTH 80° 11.5997′W

## **Terminology**



**Terminal Station** 



вмн

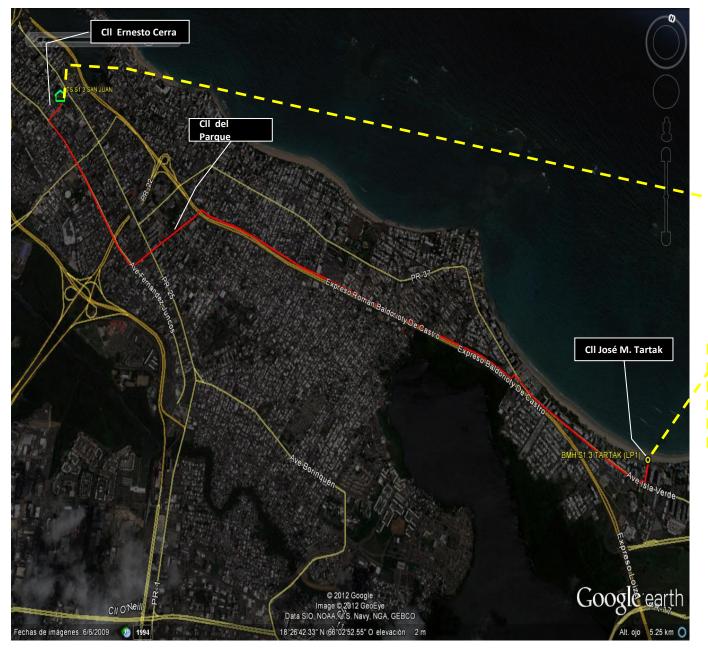


Land Route

TAR 3.	San Iuan	Puerto Rio	o Landing S	Station
TAD 3.	San Juan,	T der to Kie	o Landing C	station

## **SAN JUAN**

Tartak St (LP1)
Segment 1.3



TS SEG. 1.3

ADDRESS: Calle Cerra #609

Pda. 15 Santurce

San Juan, Puerto Rico

LATITUDE 18° 27.147 'N LENGTH 66° 04.764 'W

BMH SEG. 1.3

ADDRESS: Tartak St (LP1) LATITUDE 18° 26′ 37.74″ N LENGTH 66° 1′ 17.05″W

## **Terminology**



**Terminal Station** 



вмн



Land Route

## **SAN JUAN**

Condado (LP2) Segment 5.1



BMH SEG. 5.1

ADDRESS: Condado (LP2) LATITUDE 18° 27′ 25.125″ N LENGTH 66° 04′ 15.823″ W

TS SEG. 1.3 Y 5.1

ADDRESS: Calle Cerra #609

Pda. 15 Santurce

San Juan, Puerto Rico

LATITUDE 18° 27.147 'N LENGTH 66° 04.764 'W

## Terminology



**Terminal Station** 



вмн



**Land Route** 

#### **SAN JUAN**

#### Segment 1.3 Y 5.1



BMH SEG. 1.3

ADDRESS: Tartak St (LP1) LATITUDE 18° 26.609 'N LENGTH 66° 01.283 'W

BMH SEG. 5.1

ADDRESS: Condado (LP2)
LATITUDE 18° 27' 25.125" N
LENGTH 66° 04' 15.823" W

TS SEG. 1.3 Y 5.1

ADDRESS: Calle Cerra #609

Pda. 15 Santurce

San Juan, Puerto Rico

LATITUDE 18° 27.147 'N LENGTH 66° 04.764 'W

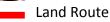
#### **Terminology**



**Terminal Station** 



BMH



# TAB 4: Puerto Plata, Dominican Republic Landing Station

#### **PUERTO PLATA**

Los Castillitos (LP1) Segment 2.2



BMH SEG. 2.2

ADDRESS: Los Castillitos (LP1) LATITUDE 19° 47.829 'N LENGTH

70° 41.11′ W

TS SEG. 2.2

ADDRESS: Calle 27 de Febrero

Esq. Calle Cardenal Sanchas

Puerto Plata,

República Dominicana

19° 47.485 'N LATITUDE LENGTH 70° 41.258 'W

# **Terminology**



**Terminal Station** 



ВМН



## **PUERTO PLATA**

Luperon (LP2) Segment 5.1



#### **PUERTO PLATA**

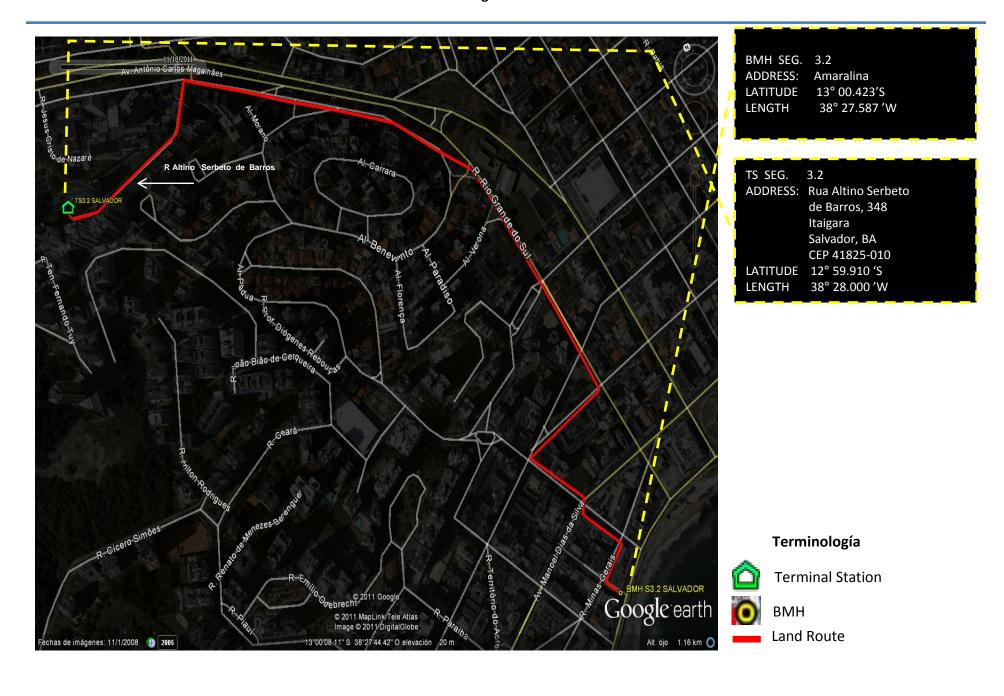
Segment 2.2 y 5.1



# TAB 5: Salvador de Bahía, Brazil Landing Station

## Salvador de Bahía

Segment 3.2



TAB 6: Rio de Ja	aneiro, Brazil Landing Station

## Rio de Janeiro

Praia da Macumba Segment 3.3



BMH SEG. 3.3

ADDRESS: Praia da Macumba

LATITUDE 23° 02.070′ S LENGTH 43° 29.489′ W

TS SEG. 3.3

ADDRESS: Estrada do Pontal

6823-6831

Recreio dos Bandeirantes,

Rio de Janeiro RJ, 22785-560

LATITUDE 23° 01.865 ' S LENGTH 43° 28.933 ' W

# Terminology



**Terminal Station** 



ВМН





#### **Fortaleza**

Praia do Futuro I Segment 1.6 y 3.1



BMH SEG. 1.6

ADDRESS: Praia do Futuro I LATITUDE 03° 43.739'S LENGTH 38° 27.508 'W

TS SEG. 1.6 y 3.1

ADDRESS: Site 33: Av. Santos Dumont (old Av. Engenheiro Sabóia Ribeiro) Loteamento Praia Antonio Diogo Q

198 Lts 4,5 e 6

(Between Av. Dr. Manuel Rodrigues Monteiro and Av. Oliveira Filho)

Praia do Futuro – Fortaleza LATITUDE 03° 44.127 ' S LENGTH 38° 27.531 ' W

BMH SEG. 3.1

ADDRESS: Praia do Futuro II LATITUDE 03° 44.973′ S LENGTH 38° 26.854′ W

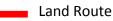
#### **Terminology**



**Terminal Station** 



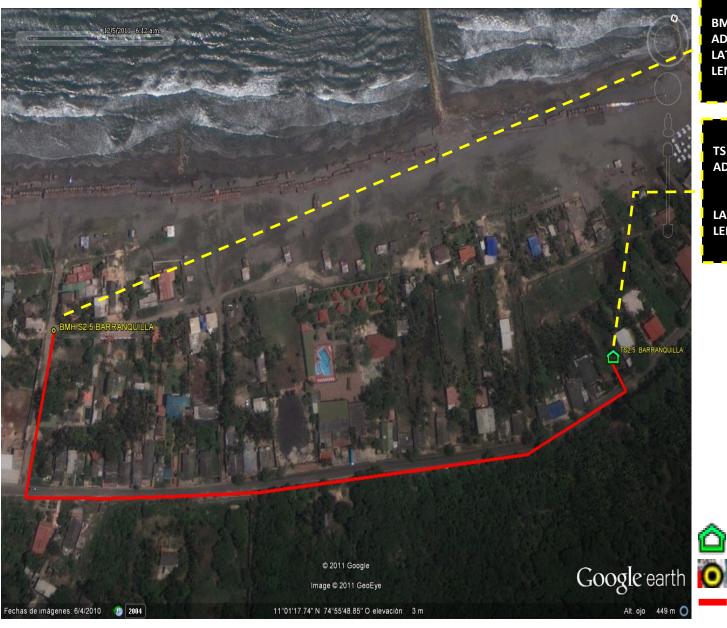
BMH



ion
ion

# Baranquilla

**Puerto Salgar** Segment 2.5



BMH SEG. 2.5

**ADDRESS:** Puerto Salgar LATITUDE 11° 01.251′ N LENGTH 74° 55.926 ' W

TS SEG. 2.5

**ADDRESS: Puerto Colombia:** 

Calle 6 No. 16-299

Corregimiento de Salgar

LATITUDE 11° 01.3146'N 74° 55.7065'W LENGTH

# **Terminology**



**Terminal Station** 



ВМН



<b>TAB 9:</b>	Cartagena, Colo	mbia Landing Station

# Cartagena

Laguna del Cabrero Segment 4.5



BMH SEG. 4.5

Laguna del Cabrero **ADDRESS:** 

10° 26.225′ N LATITUDE LENGTH 75° 32.077′ W

TS SEG. 4.5

ADDRESS Carrera 3 Nº 46A - 63

Cartagena sector Marbella

Colombia

LATITUDE 10° 26.112 ' N 75° 32.229 ' W LENGTH

# **Terminology**



**Terminal Station** 



вмн



TAB 10: Puerto Barrios, Guatemala Landing Station

#### **Puerto Barrios**

Puerto Barrios, GT Segment 4.4



BMH SEG. 4.4

ADDRESS: Puerto Barrios LATITUDE 15° 44.491′ N LENGTH 88° 35.979′ W

TS SEG. 4.4

ADDRESS 8va. Avenida y 10 Calle

Esq. Zona 1

Puerto Barrios, Izabal

Guatemala

LATITUDE 15° 43.875 ' N LENGTH 88° 35.860 ' W

# Terminology



**Terminal Station** 



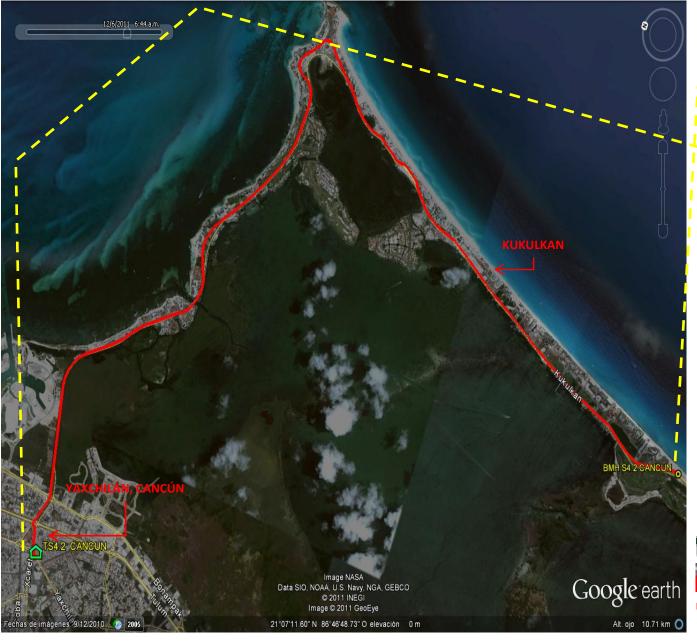
вмн



# **TAB 11:** Cancún, Mexico Landing Station

# Cancún

Playa Delfines Segment 4.2



BMH SEG. 4.2

**ADDRESS: Playa Delfines LATITUDE** 21° 03.741′ N 86° 46.754′ W LENGTH

TS SEG. 4.2

**ADDRESS** Ave. Yaxchilan 69

Supermanzana 21

Col. Centro C.P. 77500 Cancún, Quintana Roo

LATITUDE 21° 09.305 ' N **LENGTH** 

86° 49.800 ' W

# **Terminology**



**Terminal Station** 



ВМН

