

**the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Application of)
)
TELEFONICA INTERNATIONAL)
 WHOLESALE SERVICES USA, INC.)
(Lead Applicant))
)
CABLE AND WIRELESS (BVI) LIMITED)
CABLE & WIRELESS (EWC) LIMITED)
CABLE & WIRELESS PANAMA S.A.)
SERVICIO DI TELECOMUNICACION DI)
 ARUBA N.V. (SETAR))
CABLE ANDINO INC.)
CABLE ANDINO USA, INC.)
CABLE ANDINO S.A. CORPANDINO)
TELEFONICA INTERNATIONAL)
 WHOLESALE SERVICES AMERICA S.A.)
TI WHOLESALE SERVICES PUERTO)
 RICO, INC.)
TELEFONICA INTERNATIONAL)
 WHOLESALE SERVICES COLOMBIA S.A.)
ANTELECOM N.V.)
)
for a License to Construct, Land and Operate) File No. SCL-LIC-2013-_____
an Undersea Cable System Linking the British)
Virgin Islands, Puerto Rico, Aruba, Colombia,)
Panama, Ecuador and the continental United States)
)
Pacific Caribbean Cable System)
)

JOINT APPLICATION FOR SUBMARINE CABLE LANDING LICENSE

Cable and Wireless (BVI) Limited (“Cable and Wireless BVI”), Cable & Wireless (EWC) Limited (“Cable & Wireless EWC”), Cable & Wireless Panama S.A. (“Cable & Wireless Panama”), Servicio Di Telecomunicacion Di Aruba N.V. (“SETAR”), Cable Andino Inc. (“Cable Andino”), Cable Andino USA, Inc. (“Cable Andino USA”), Cable Andino S.A.

Corpandino (“Cable Andino Corpandino”), Telefonica International Wholesale Services America S.A. (“TIWS America”), Telefonica International Wholesale Services USA, Inc. (“TIWS USA”),¹ TI Wholesale Services Puerto Rico, Inc. (“TIWS Puerto Rico”), Telefonica International Wholesale Services Colombia S.A. (“TIWS Colombia”) and Antelecom N.V. (“UTS”) (collectively referred to herein as the “PCCS Consortium”), 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 linking the continental United States and the British Virgin Islands (the “BVI”), Puerto Rico, Aruba, Colombia, Panama, and Ecuador. The PCCS is a next generation, high capacity Pacific-Caribbean cable system designed to meet growing bandwidth requirements for broadband traffic between the United States and the Caribbean, Central America and South America. The PCCS will greatly increase available capacity on a number of important routes, provide critical routing diversity from existing cables, and improve service quality, resiliency, and latency on these routes.

I. DESCRIPTION OF THE CABLE SYSTEM

The PCCS will be a state-of-the-art private, non-common carrier submarine cable system that will directly connect the United States to points in the Caribbean, Central America and the northern part of South America, spanning an approximate 6,000 kilometers on an end-to-end basis. All segments are designed to carry up to 100 wavelengths at 100 Gb/s per fiber pair using

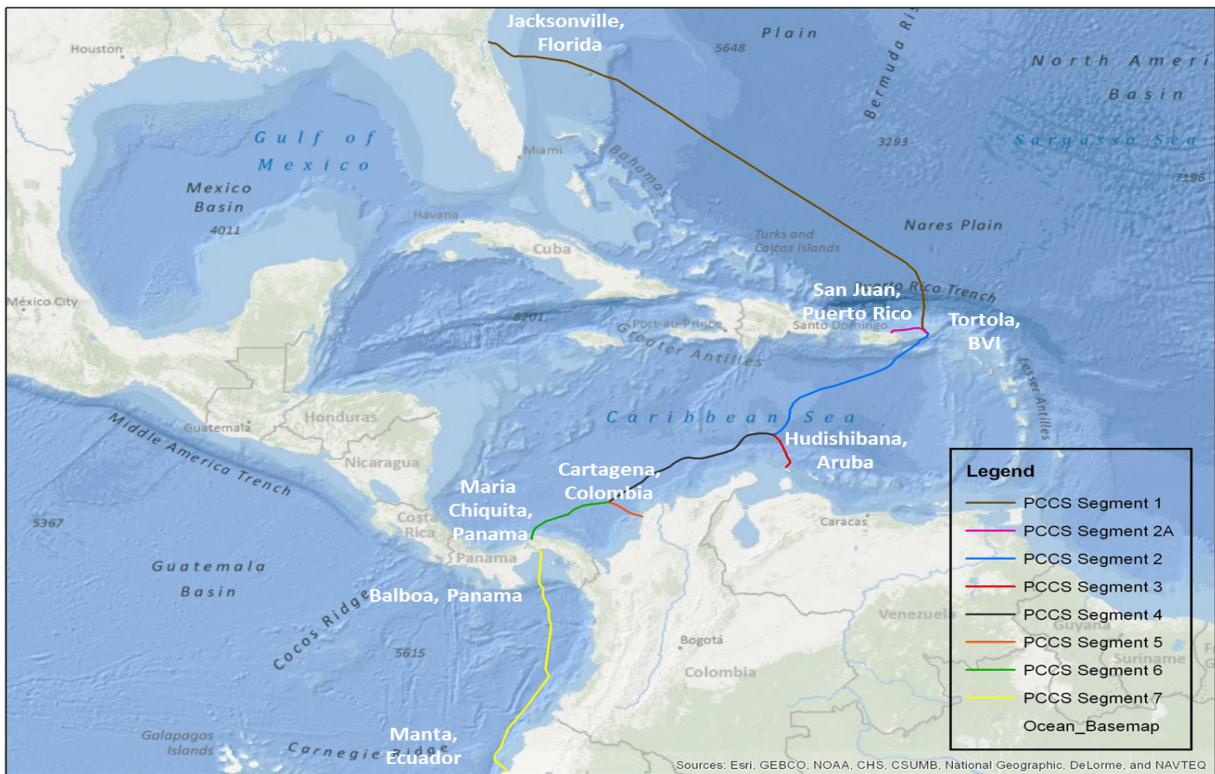
¹ For purposes of this Application, Telefonica International Wholesale Services USA, Inc. (“TIWS USA”) has been designated the “Lead Applicant”. As such, and for purposes of efficiency, communications regarding this Application should be directed to counsel for TIWS USA: Richard Rubin, Winston & Strawn LLP, 1700 K ST NW, Washington, DC 20006, Tel: (202) 282-5000 (rrubin@winston.com). This contact information is also listed in Appendix I. Each Applicant (i.e., each member of the PCCS Consortium) has obtained an FCC Registration Number (“FRN”), which is identified in Appendices A—L.

the newest available, proven repeatered and unrepeatered technology. Each segment will be constructed with a specific fiber pair count; most having 2 or 3 pairs, whereas the segment between Tortola, BVI and Jacksonville, Florida will have 8 pairs. At initial service, each segment of the PCCS will be equipped with either 1 or 2 100 Gb/s wavelengths. Not all of the fiber pairs will be lit at the time of initial service; some will be left dark for future upgrade and use. Thus, the ultimate design capacity that the PCCS will provide among the United States, the Caribbean, Central America and South America will be 80 Tb/s, based on its 8 fiber pair x 100 Gb/s x 100 wavelength design. Initially, the PCCS's capacity into the Jacksonville, Florida landing station will be 400 Gb/s, equipped with two 100 Gb/s waves on each of its 2 initially-lit fiber pairs.

The PCCS capacity will dramatically boost connectivity and substantially increase the availability of broadband services in and between North, South and Central America and the Caribbean. The system will substantially increase submarine cable capacity in the region and provide a robust platform to support future growth in advanced Internet Protocol applications and traffic, including multimedia and Internet video applications that depend on high bandwidth transmission facilities. Additionally, the PCCS will increase communications reliability and help reduce the risk of communications disruption by providing cable route diversity and alternative bandwidth access to existing cables in the region. The PCCS 100Gb/s-compatible wet plant design utilizes coherent technology; the cable uses state-of-the-art submarine fiber and high bandwidth repeaters, and the latest 100Gb/s coherent DWDM line terminal equipment. The PCCS will be able to be seamlessly upgraded over time, without interrupting existing service on the system, simply by providing additional transponders in cable landing stations.

The PCCS will efficiently route services from their originating country to and from the United States, minimizing latency, transit, backhaul costs and complexity. The main (trunk) PCCS route extends from Florida to Ecuador, with intermediate landings in the British Virgin Islands (“BVI”) and Panama, plus additional branch landings in Aruba and Colombia (each of which is enabled through Branching Units along the main trunk route). A PCCS landing in Puerto Rico is accomplished via a separate but integrated point-to-point cable between the BVI and Puerto Rico. The baseline configuration of the submarine cable system consists of the following 9 segments, 2 of which extend from Branching Units, and 1 being an existing terrestrial segment:

- Segment 1 (S1): Jacksonville, FL (USA) - Tortola (BVI)
- Segment 2 (S2): Tortola (BVI) – Branching Unit (near Aruba)
- Segment 2A (S2A): Tortola (BVI) – San Juan (Puerto Rico, USA)
- Segment 3 (S3): Branching Unit (near Aruba) – Hudishibana (Aruba)
- Segment 4 (S4): Branching Unit (near Aruba) – Branching Unit (near Colombia)
- Segment 5 (S5): Branching Unit (near Colombia) – Cartagena (Colombia)
- Segment 6 (S6): Branching Unit (near Colombia) – Maria Chiquita (Panama)
- Segment 6A (T6A): Terrestrial segment between Maria Chiquita (Panama) and Balboa (Panama)
- Segment 7 (S7): Balboa (Panama) – Manta (Ecuador)



At the Hudishibana, Aruba cable landing station, the PCCS will interconnect with the Alonso de Ojeda 2 cable (which will be independently completed prior to the PCCS's service date) to connect the PCCS to Curacao. Further, the PCCS can interconnect with other existing submarine cables that serve the Caribbean, Central America and South America regions.² Most of these existing cables retain substantial capacity capability by using state-of-the-art technologies; many have already been upgraded with 10 Gb/s and 40 Gb/s technology, and some have been upgraded or are exploring upgrades with 100 Gb/s technology. Thus, interconnection

² Most notably, these cables include: (a) Pan American, a cable connecting the U.S. Virgin Islands, Aruba, Colombia, Venezuela, Panama, Ecuador, Peru and Chile that also can connect via a multiplicity of cables between the U.S. Virgin Islands and Florida to the United States mainland; (b) ARCOS-1, a large cable network that, like PCCS, connects Florida to many Caribbean and Latin American countries, including Colombia, Panama and San Juan; (c) Maya-1, a large cable network connecting Florida to Mexico, Panama, Colombia and several Caribbean countries; (d) Global Crossing cables (PAC, SAC, Cook's Crossing and MAC), which together interconnect the United States, South America, Central America and the Caribbean; (e) Americas 2, a cable connecting the continental United States, Puerto Rico, Curacao and several other Caribbean and Latin American countries; and (f) SAM-1, connecting Florida, Puerto Rico, Brazil, Argentina, Chile, Peru, Guatemala, and Colombia.

of the PCCS with these cables will not only increase the bandwidth and route diversity available to these regions as a whole, but also improve global/regional network resiliency, particularly in the event rerouting is necessary. Moreover, while the PCCS does not have any Branching Units beyond those described earlier, it is very possible to utilize its large capacity to carry traffic from new cables in the Caribbean, Central America and/or South America to/from the United States.

Construction of the PCCS is scheduled to begin in 2013, with September 2014 being the targeted completion date. The minimum life expectancy of the PCCS is 25 years.

The PCCS consortium presently is comprised of 12 members, all of whom are parties to the PCCS Construction and Maintenance Agreement (“C&MA”). Although there are 12 parties to the C&MA, only five (5) are unaffiliated. More specifically, Cable and Wireless (BVI) Limited, Cable & Wireless (EWC) Limited and Cable & Wireless Panama S.A. are all indirect subsidiaries of Cable & Wireless Communications Plc; Cable Andino Inc., Cable Andino USA, Inc., and Cable Andino S.A. Corpandino are all subsidiaries or affiliates of Telconet S.A.; and Telefonica International Wholesale Services America S.A., Telefonica International Wholesale Services USA, Inc., TI Wholesale Services Puerto Rico, Inc., Telefonica International Wholesale Services Colombia S.A. are indirect subsidiaries of Telefonica S.A.

Each Applicant has a varying degree of voting rights and ownership in the cable corresponding to its level of investment in the PCCS, but in each case the ownership interest is greater than 5% in at least one segment or cable landing station of the PCCS. Greater detail regarding Applicant is provided in Section III and in the attached individual Appendices A — L.

The PCCS will have 8 landing stations, two in the United States (Florida and Puerto Rico), two in Panama, one each in the British Virgin Islands, Aruba, Colombia and Ecuador. The landing stations in Aruba, Colombia, Puerto Rico and the Maria Chiquita station in Panama

are all existing landing stations at which existing submarine cables currently land. The landing stations in Florida and Ecuador will be newly constructed at new sites in each of these countries. Landing stations in the British Virgin Islands and Balboa (Panama) will be expanded with new, nearby, interconnected construction to accommodate the PCCS.

The landing stations and portions of the PCCS that will be located in territorial waters will be owned and operated by the PCCS parties or their affiliates in their respective home service territories in accordance with the applicable laws of the countries in which the landing stations are located.³ Each landing party will own the building housing the landing station, its own network protection equipment and digital cross connects, and its share of the jointly-owned facilities. All of the foreign landing station owners have agreed to provide station access and collocation, as permitted by applicable laws, so that cable users can access multiple backhaul providers.

All of the members of the consortium may unconditionally use their PCCS circuits. Any member may also enhance the capabilities of the PCCS by exercising the right to upgrade the system, as long as that party (and others that join in the expansion) covers the cost of the upgrade. Any member may transfer its right to use capacity to any of its subsidiaries or affiliates. In addition, there are no restrictions on the resale of capacity, which means that any member may sell private indefeasible rights of use (“IRUs”) to any properly licensed non-member (either individually or through collaborative agreements). Accordingly, third parties will be able to

³ TIWS USA will own and operate the landing station at Jacksonville, Florida; Cable & Wireless (BVI) will own and operate the landing station at Tortola, British Virgin Islands; TIWS Puerto Rico will own and operate the landing station at San Juan, Puerto Rico; SETAR will own and operate the landing station at Hudishibana, Aruba; TIWS Colombia has the rights to operate the landing station at Cartagena, Colombia; Cable & Wireless Panama will own and operate the landing stations at Maria Chiquita, Panama and at Balboa, Panama; and Cable Andino S.A. Corpandino, will own and operate the landing station at Manta, Ecuador.

obtain transiting to, from, or through any country in which the PCCS lands through the purchase of IRUs.

II. PUBLIC INTEREST STATEMENT

Construction and operation of the PCCS is in the public interest and should be approved for at least three reasons: (1) it will help meet the dramatically growing demand for voice, data, and Internet traffic between the Caribbean, Central America, South America and the United States; (2) it will provide important facilities-based competition on United States-Caribbean and United States-South America routes; and (3) it will enhance service quality, increase resiliency, and decrease latency in providing service to the Caribbean, Central America and South America regions.

First, the demand for communications services between the Caribbean, Central and South America and the United States is exploding, and the PCCS will serve the public interest by helping to meet this demand. According to recent TeleGeography Research reports, Latin America is a burgeoning bandwidth market. Data from TeleGeography's Global Bandwidth Research Service reveal that international bandwidth usage grew nearly 9-fold between 2007 and 2011, from 659 Gbps to 5.6 Tbps, and demand between the US and Latin America more than quadrupled. To meet this growing demand, submarine cable operators are adding capacity at a rapid pace through upgrades to existing systems and a planned new wave of submarine cable investments in the region.⁴ The demand is both fueled and enabled by operators in the Latin

⁴ <http://www.telegeography.com/products/commsupdate/articles/2012/08/29/cable-investors-eye-latin-america-for-new-builds/>;
http://www.telegeography.com/products/commsupdate/assets/comms_update/images/assets/news20120829-1.gif;
<http://www.telegeography.com/products/commsupdate/articles/2012/02/22/investments-in-latin-american-broadband-market-yield-growth/>;
http://www.telegeography.com/products/commsupdate/assets/comms_update/images/assets/news20120222-1.gif;
see also <http://www.pwc.com/gx/en/communications/review/features/rapid-growth-heralds-a-bright-future.jhtml>.

America and Caribbean regions enhancing the availability and throughput of broadband to their subscriber base. Another report by Telegeography shows that broadband penetration in the Latin America and Caribbean regions has dramatically increased over the last several years, from less than 5% to nearly 30% as of 2011.⁵ That growth in demand is expected to continue to increase dramatically in the near future. The PCCS, as a next generation, very high capacity cable system serving all of these countries, with the ability ultimately to be extended, will serve the public interest by meeting this demand with a state-of-the-art network capable of handling the full range of emerging voice and data services and technologies, including multimedia and Internet services.

Second, the PCCS will increase facilities-based competition on many United States-Caribbean, United States-Central America and United States-South American routes. Indeed, the PCCS will provide an important connection for established cables,⁶ as well as an alternative to other established cables.⁷ The Commission has consistently found that “the public interest is best served by promoting the rapid expansion of capacity in order to promote facilities-based telephone services.”⁸ The PCCS will offer a facilities-based competitive alternative to existing cables, which will give customers additional choices. In addition, the foreign landing station owners will provide open access and collocation rights at their landing stations, as permitted by

⁵ *Id.*

⁶ For example, the PCCS proposal anticipates that, in the Aruba cable landing station, the PCCS will connect with the Alonso de Ojeda 2 cable which will provide the parties to the PCCS consortium an IRU in one fiber pair to reach Curacao. Also, Saint Maarten can connect to the PCCS in Puerto Rico through an upgraded Taino-Carib Cable and in Tortola, BVI through an upgraded East Caribbean Fiber System. *See* <http://www.curacaochronicle.com/local/uts-ceo-sint-maarten-not-left-out-in-the-cold-by-pccs/>.

⁷ These cables include, among others, the Americas 2 Cable, the Pan Am Cable, the SAm-1 Cable, the ARCOS-1 Cable, the Maya-1 Cable and the Fibralink Cable.

⁸ *See* AT&T Corp. et al., Joint Application for a License to land and Operate a Submarine Cable Network Between the United States and Japan, 14 FCC Rcd. 13066, ¶ 25 (1999).

applicable laws, and all PCCS owners are free to resell capacity, which will further increase competitive options for services on these routes. Moreover, this region receives satellite services from multiple satellites.⁹ Thus, the availability of multiple competitive alternatives to the proposed PCCS means that the members of the PCCS consortium would be unable to restrict output or raise prices without losing customers. Therefore, the Commission need not require the PCCS members to serve the public indiscriminately.

Third, the PCCS will enhance service quality, increase resiliency, and reduce latency on communications between the United States and important portions of the Caribbean-South American region. The PCCS, with its very high capacity and state-of-the-art capabilities, will greatly improve the quality of service provided between the Caribbean-South America regions and the United States and also will add capacity and diversity to routes between the mainland United States and Puerto Rico. The PCCS also will provide increased resiliency to the PCCS network; the PCCS can interconnect with a number of existing cables and will provide additional transmission options in the event of a disaster. Additionally, the PCCS will reduce latency (i.e., the time it takes a data packet to move across the network) between the United States and some of the South American and Caribbean countries served by the PCCS. In addition, the PCCS will advance U.S. policy goals by encouraging investment in the global communications infrastructure, facilitating the development of advanced communications capabilities on international networks, and furthering economic relationships between the United States and South American and Caribbean economies.

Finally, all of the landing stations are located in countries that are WTO members except for Aruba. As a result, Aruba is subject to the FCC's Effective Competitive Opportunities

⁹ Intelsat, SES, and Telesat all provide satellite services in the region.

(“ECO”) Test.¹⁰ However, the FCC recently analyzed Aruba under the test and determined that Aruba satisfies each of the four prongs of the ECO Test applicable to section 214 authority applications, and granted an international Section 214 authorization to SETAR’s affiliate, T.A. Resources N.V.¹¹

The Commission applies a version of the ECO Test as part of its analysis under section 2 of the Cable Landing License Act.¹² As described in the *Reform of Rules and Policies on*

¹⁰ The FCC requires that a carrier or investor make a showing of effective competitive opportunities before it can (a) obtain a Section 214 authorization to provide international telecommunications services directly between the United States and the foreign carrier/investor’s home market using undersea-cable or satellite capacity, (b) obtain a cable landing license to land an undersea cable in the United States or its territories, or (c) acquire an affiliation (cross-ownership of greater than 25 percent) with a licensed U.S. carrier. *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, Market Entry and Regulation of Foreign-Affiliated Entities*, IB Docket Nos. 97-142 and 95-22, Report and Order and Order on Reconsideration, 12 FCC Rcd 23891, ¶13 (1997) (“*Foreign Participation Order*”). The foreign carrier or investor must make legal and factual submissions to demonstrate that its home market: provides effective opportunities to compete in that country’s market for the service which the foreign carrier or investor seeks to provide in the United States; provides reasonable and nondiscriminatory charges, terms, and conditions for interconnection to a foreign carrier’s domestic facilities; provides competitive safeguards; provides an effective regulatory framework to develop, implement and enforce legal requirements, interconnection arrangements, and other safeguards. *Id.* at ¶23, fn. 23 (summarizing ECO test factors established in Foreign Carrier Entry Order). The ECO Test applies only to countries that are not members of the World Trade Organization (“WTO”). *Id.* at 13.

¹¹ *T.A. Resources N.V.*, FCC File No. ITC-214-201000107-00010, Order and Authorization, (International Bureau November 17, 2011) (“*T.A. Resources*”); *see also Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market*, IB Docket No. 12-299, Notice of Proposed Rulemaking, rel. October 11, 2012 at ¶6. (“The ECO Test that applies to international section 214 authority applications filed by foreign carriers or certain of their affiliates is codified in section 63.18(k) of the Commission’s rules. [47 C.F.R. § 63.18(k)(3)(i)-(vi)] If an applicant is a foreign carrier or an affiliate of a foreign carrier, [Section 63.18(j) of our rules identifies the U.S.-foreign carrier affiliations to which the ECO Test applies] and if the foreign carrier has market power [See *Foreign Carrier Entry Order* 11 FCC Rcd at 3917, ¶ 116; *see also* 47 C.F.R. § 63.09(f)] in a non-WTO Member country which the applicant seeks authority to serve, the applicant must demonstrate that there are effective competitive opportunities for U.S. carriers in the foreign country. In particular, the applicant must demonstrate: (1) the legal ability of U.S. carriers to enter the foreign market and provide facilities-based and/or resold international services, in particular international message telephone service (IMTS), [47 C.F.R. § 63.18(k)(3)(i),(ii)]. The Commission examines whether the foreign destination market offers effective competitive opportunities for U.S. carriers to provide the service(s) being applied for under section 214 – whether facilities-based and/or resold switched or private line services], (2) the existence of reasonable and nondiscriminatory charges, terms and conditions for interconnection to a foreign carrier’s domestic facilities for termination and origination of international services or the provision of the relevant resale service [47 C.F.R. § 63.18(k)(3)(iii)], (3) the existence of competitive safeguards in the foreign country to protect against anticompetitive practices [47 C.F.R. § 63.18(k)(3)(iv)(A),(B),(C)], (4) the existence of an effective regulatory framework in the foreign country to develop, implement and enforce legal requirements, interconnection arrangements and other safeguards [47 C.F.R. § 63.18(k)(3)(v)], and (5) any other factors the applicant deems relevant to the ECO Test demonstration. [47 C.F.R. § 63.18(k)(3)(vi).”]

¹² *Foreign Participation Order* at ¶130.

Foreign Carrier Entry Into the U.S. Telecommunications Market NPRM, “the Commission examines: (1) the legal or *de jure*, ability of U.S. licensed companies to have ownership interests in submarine cables landing in the foreign market, and (2) if no explicit legal restrictions on ownership exist, the practical, or *de facto*, ability of U.S.-licensed companies to have ownership interests in cable facilities in the foreign market. [citation omitted] The Commission also considers other public interest factors consistent with its discretion under the Cable Landing License Act that may weigh in favor of or against grant of a license, including any national security, law enforcement, foreign policy or trade policy concerns that may be raised by a particular application. [citation omitted].”¹³

In connection with its analysis of Aruba under the ECO Test, the Commission imposed several conditions on the grant of international Section 214 authorization to T.A. Resources. While these conditions are applicable to the grant of authority to T.A. Resources to provide section 214 international telecommunications services between Aruba and the United States, the conditions are not applicable to a grant of a license to land in the United States a submarine cable that has landing stations in the United States and Aruba. For example, a requirement that T.A. Resources or SETAR be regulated as dominant for purposes of its provision of international

¹³ In addition, the ECO test applies with regard to the requirement that U.S. cable landing licensees notify the Commission of their affiliations with foreign carriers authorized to operate in a destination market where a U.S.-licensed cable lands. Finally, the Commission has stated that “Where a U.S.-licensed cable lands in a non-WTO Member country and the U.S. cable landing licensee proposes to acquire an affiliation with a foreign carrier in that non-WTO Member country, the U.S. licensee must demonstrate in its notification either that the foreign carrier lacks market power in that country or that there are effective competitive opportunities for U.S.-licensed companies to land and operate submarine cables in that country. [citation omitted] If the licensee is unable to make either showing, then the Commission may impose conditions on the authorization or proceed to an authorization revocation hearing.” *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market* at ¶10; see also 47 C.F.R. § 1.768(a), (b); 47 C.F.R. § 1.768(g)(2); *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market* at n. 35 (“the foreign carrier affiliation notification need not be filed before consummation of the transaction if (1) the Commission has previously determined that the foreign carrier lacks market power in the non-WTO destination market of the cable, or (2) the foreign carrier owns no facilities in the market.”), at ¶10 (“Furthermore, this obligation extends to licensees acquiring an entity that owns or controls a cable landing station in that market.”).

telecommunications on a U.S.-Aruba route does not translate to the landing in the United States of a submarine cable that does not have a direct U.S.-Aruba route in its configuration. SETAR does not have an international Section 214 authorization from the Commission and thus does not currently have authorization to provide international telecommunications services between the United States and Aruba. The PCCS parties suggest that consideration of such a condition is more appropriate in the context of the Commission's review of an international Section 214 application by SETAR or an affiliate thereof, to provide such service, if and when such an application is filed, rather than in the Commission's review of an application for a cable landing license where there is no request for authorization to provide actual telecommunications services.

Similarly, a requirement that T.A. Resources or SETAR comply with Sections 43.51, 43.61, and 43.82 of the Commission's rules does not translate to the landing in the United States of a submarine cable because there is no request for authorization to provide actual telecommunications services and, therefore, no traffic or related data to report. Finally, a condition that SETAR "must promptly provide reasonable and nondiscriminatory interconnection to their facilities in Aruba for U.S. carriers for the origination and termination of international services"¹⁴ has no relationship to the authority sought herein. Unlike the T.A. Resources situation where section 214 international authority was sought to carry telecommunications traffic between origination and termination points in Aruba and the U.S., the Aruba landing station, like all other landing stations, is a landing, not an origination or termination point. All the landing parties in the PCCS consortium are committed to competitive access for local telecommunications service providers to interconnect with the PCCS and carry

¹⁴ *T.A. Resources* at ¶27.

telecommunications traffic to inland Aruba or for connection to other international submarine cables.

Finally, in its *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market NPRM*, the Commission made clear its present thinking with respect to the ECO test. In particular, the Commission has sought comments on the elimination of the ECO test in which case it “would no longer require non-WTO applicants to demonstrate compliance with the ECO Test, and the Commission would no longer engage in an ECO Test analysis [and, i]nstead, we would rely on our authority to analyze potential anticompetitive harm on a case-by-case basis to make a public interest determination as to whether U.S. carriers are experiencing competitive problems in that market, and whether the public interest would be served by authorizing the foreign carrier to enter the U.S. market.”¹⁵

Alternatively, the Commission has proposed to modify the ECO test “to eliminate the requirement that applicants show that there is an effective regulatory framework in the foreign country to develop, implement, and enforce legal requirements, interconnection arrangements and other safeguards. [citation omitted]. We also propose to eliminate the requirement that applicants must show whether competitive safeguards exist in the foreign country to protect against anticompetitive practices, with the exception of retaining a competitive safeguard that requires timely and nondiscriminatory disclosure of technical information needed to interconnect with carriers’ facilities. [citation omitted].” Importantly, the Commission used the *TA Resources* case as the example for why such modifications are needed. Specifically, while “[t]he Bureau found that U.S. carriers have the legal ability to enter and provide telecommunications services in the applicant’s market[,] [t]he applicant had difficulty, however,

¹⁵ *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market NPRM* at ¶¶16-18.

demonstrating that U.S. carriers had the *de facto*, or practical, ability to enter the applicant's market. In particular, the Bureau found that Aruba lacked fully-developed cost allocation rules and that its telecommunications regulations remain pending with the regulator, which has yet to attain full separation from the government, which, in turn, owns the dominant Aruban carrier. [citation omitted]. The Bureau determined, however, that on balance, there was sufficient regulatory oversight to protect and promote competition in the Aruban telecommunications market as evidenced by the expanding list of competitors in the Aruban international telecommunications market and the absence of any complaints documented in the record."¹⁶ Since that time, there have been no developments that would justify a change in the Bureau's determination and, in light of the Commission's proposals in its *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market NPRM*, there is no reason to revisit that determination.

There are also two countries—Panama and the British Virgin Islands—which account for 3 of the landing stations, where Cable & Wireless Panama and Cable & Wireless (West Indies) Limited, respectively, are presumed to possess market power.¹⁷ However, Panama and the British Virgin Islands are both WTO members and thus not subject to the ECO test.¹⁸

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

The information requested by Sections 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:

¹⁶ *Id.* at ¶19.

¹⁷ *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). Cable & Wireless (West Indies) Limited is the 100% owner of Cable and Wireless (BVI) Limited.

¹⁸ *See Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market*, IB Docket No. 12-299, Notice of Proposed Rulemaking, rel. October 11, 2012 at ¶ 6.

APPENDIX A:	Cable and Wireless (BVI) Limited
APPENDIX B:	Cable & Wireless (EWC) Limited
APPENDIX C:	Cable & Wireless Panama S.A.
APPENDIX D:	Servicio Di Telecomunicacion Di Aruba N.V. (SETAR)
APPENDIX E:	Cable Andino Inc.
APPENDIX F:	Cable Andino USA, Inc.
APPENDIX G:	Cable Andino S.A. Corpandino
APPENDIX H:	Telefonica International Wholesale Services America S.A.
APPENDIX I:	Telefonica International Wholesale Services USA, Inc.
APPENDIX J:	TI Wholesale Services Puerto Rico, Inc.
APPENDIX K:	Telefonica International Wholesale Services Colombia S.A.
APPENDIX L:	Antelecom N.V.

In addition, the information required by Sections 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.

(5) Landing Stations

Information about the eight landing stations of the PCCS cable system is included as Appendix M.

(6) Common Carrier or Non-Common Carrier Status

The PCCS cable system will be operated as a private, non-common carrier cable. Private carriage is fully consistent with established Commission policy and will advance the public interest. In determining whether a submarine cable qualifies to be operated on a non-common carrier basis, the Commission follows the two-part test established in *NARUC*.¹⁹ Under this test, a submarine cable may be operated on a non-common carrier basis if: (1) there is no legal compulsion to serve the public indifferently; and (2) there are no reasons implicit in the nature of

¹⁹ *Nat'l Ass'n of Regulatory Util. Comm'ners v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) ("NARUC"), cert. denied, 425 U.S. 992 (1976).

the operations to expect that the applicant would make capacity available to the public indifferently and indiscriminately.²⁰

The PCCS satisfies both prongs of this two-part test. First, the Commission has held that there is 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,²¹ and 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.²² Because the Caribbean, Central American and South American region presently is served by many other cable systems, and additional cable systems are under construction or have been proposed, there is no lack of alternative facilities under the first factor. In this case, there are a variety of alternative facilities on existing cable and satellite systems between the continental United States and the BVI, Puerto Rico, Aruba, Curacao, Colombia, Panama, and Ecuador. This region is served by other submarine cables including, among others, the Americas 2, Antillas I, ARCOS-1, Pan Am Cable, Maya-1, Fibralink and SAM-1 submarine cable systems.²³ These facilities provide a variety of choices, thus precluding the PCCS members from exercising market power due to a lack of alternatives.²⁴ Accordingly, there is no reason to compel the PCCS to offer service on a common carrier basis.

²⁰ See Cable & Wireless Order, 12 FCC Rcd. 8516, 8520-23, TT 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).

²¹ See, e.g., Cable & Wireless Order, 12 FCC Rcd. at 8522, TT 14-15.

²² *Id.*

²³ See, *supra*, at 5, n. 2.

²⁴ Intelsat, SES, and Telesat also provide satellite services in the region, thus further increasing the number of viable customer alternatives.

Second, there is no reason implicit in the nature of the proposed PCCS cable operations that suggests the Applicants would make capacity available to the public indifferently. The PCCS does not hold itself out as a common carrier, and it will not offer capacity to the public indifferently. Rather, as with other private, non-common carrier cable systems, PCCS’s available capacity will be used by its consortium members and offered to other carriers on terms tailored to their particular needs. Accordingly, the PCCS will not be operated on a common carrier basis.

(7) List of Proposed Owners

Each of the PCCS Consortium members will own circuits throughout the cable network.

The ownership and voting interests shall be as follows:

Party	Overall PCCS Ownership & Voting Interest
Cable and Wireless (BVI)	0.6%*
Cable & Wireless Panama	2.6%*
Cable & Wireless (EWC)	14.8%
SETAR	11.3%
Cable Andino	17.5%
Cable Andino USA	5.6%
Cable Andino S.A. Corpandino	4.5%*
TIWS America	28.3%
TIWS USA	0.8%*
TIWS Puerto Rico	0.0%*
TIWS Colombia	0.0%*
Antelecom (UTS)	14.0%

*Certain of these entities that have less than 5% overall interest in PCCS do have specific

interests in excess of 5% with respect to particular cable landing stations or segments. Cable and Wireless (BVI) has a 100% interest in the BVI cable landing station and associated cabling. Cable & Wireless Panama has a 33.33% interest in a terrestrial segment between the Maria Chiquita, Panama cable landing station and the Balboa, Panama cable landing station. Corpandino has a 20% interest in the Balboa, Panama - Ecuador Segment and a 50% interest in the Ecuador cable landing station and associated cabling. TIWS USA owns the Jacksonville, Florida cable landing station, TIWS PR owns the Puerto Rico cable landing station and TIWS Colombia has the rights to operate the Colombia cable landing station, which is owned by its affiliate Colombia Telecomunicaciones, S.A. ESP.

As specified above in footnote 2, the ownership of the landing stations is as follows:

Applicant	Landing Station
TIWS USA	Jacksonville, Florida, USA
Cable and Wireless (BVI)	Tortola, BVI
TIWS Puerto Rico	San Juan, Puerto Rico, USA
SETAR	Hudishibana, Aruba
Operation rights held by TIWS Colombia; landing station owned by Colombia Telecomunicaciones, S.A. ESP	Cartagena, Colombia
Cable & Wireless Panama	Maria Chiquita, Panama
Cable & Wireless Panama	Balboa, Panama
Cable Andino S.A. Corpandino	Manta, Ecuador

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. In particular, all except one of the applicants and owners are from WTO countries and all have certified either (1) that they are not, and are not affiliated with, a foreign carrier that possesses market power in any PCCS destination market, or (2) that they agree to the standard competitive safeguards adopted in the Submarine Cable Report and Order, including the “No Special Concessions” rule, *see* 47 C.F.R.

§ 1.767(g), that are intended to prevent the leveraging of foreign market power into the U.S. international services market. The one country that is not a WTO member, Aruba, was recently the subject of a successful application of the ECO Test by the Commission in a proceeding that resulted in the grant of a section 214 international telecommunications authorization to an affiliate of SETAR.²⁵

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 non-common carrier fiber-optic submarine cable system directly linking the Caribbean, including Aruba, Puerto Rico, Central America, including Panama, and South America, including Colombia and Ecuador, with the mainland United States. The PCCS parties respectfully request that the Commission grant this application.

²⁵ *See, supra* at 10-15.

CERTIFICATION FROM CABLE AND WIRELESS (BVI) LIMITED

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for Cable and Wireless (BVI) Limited that Cable and Wireless (BVI) Limited is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Sean L. Auguste
General Manager
Flemming Street
Road Town, Tortola
P. O. Box 440
284 – 852 - 8710/1

For and on behalf of Cable and Wireless (BVI) Limited

Date: January 14, 2013

CERTIFICATION FROM CABLE AND WIRELESS (EWC) LIMITED

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for Cable and Wireless (EWC) Limited that Cable and Wireless (EWC) Limited is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Name :Ronald Joseph

Title: CFO

Address : Corinth, Gros Islet, St. Lucia

Telephone # 758-484-1359]

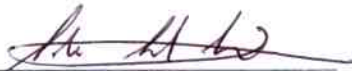
For and on behalf of Cable and Wireless (EWC) Limited

Date: January 14, 2013

CERTIFICATION FROM CABLE & WIRELESS PANAMA S.A.

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for Cable & Wireless Panama S.A. that Cable & Wireless Panama S.A. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Alex Arroyo
Executive Director of Regulatory Affairs and Interconnection
Plaza Internacional Via España, Torre C. Piso 2
(507) 882-2036

For and on behalf of Cable & Wireless Panama S.A.

Date: January 14, 2013



CERTIFICATION

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for Servicio Di Telecomunicacion Di Aruba N.V. that Servicio Di Telecomunicacion Di Aruba N.V. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

Date: January 14, 2013

By



Ricky Felix
International Network Manager
Servicio Di Telecomunicacion Di Aruba N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: + 297 525-1445

CERTIFICATION CABLE ANDINO INC.

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for **CABLE ANDINO INC.** that **CABLE ANDINO INC.** is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

By: 

Carlos Pazmiño
General Manager
Cable Andino, Inc.
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

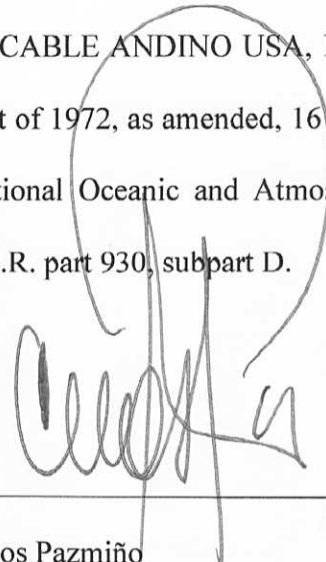
Date: January 14, 2013

CERTIFICATION CABLE ANDINO USA, INC.

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for CABLE ANDINO USA, INC. that CABLE ANDINO USA, INC. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

By: _____



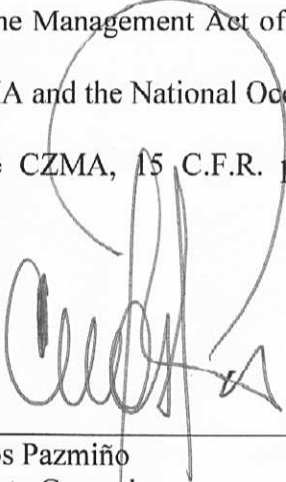
Carlos Pazmiño
President
Cable Andino USA, Inc.
1100 NW 163rd Drive
Miami, FL 33169
Tel: (305) 777-8007
Fax: (305) 777-8007

Date: January 14, 2013

CERTIFICATION CABLE ANDINO S.A. CORPANDINO

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for CABLE ANDINO S.A. CORPANDINO that CABLE ANDINO S.A. CORPANDINO is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

By: 

Carlos Pazmiño
Gerente General
Cable Andino S.A. Corpandino
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

Date: January 14, 2013

CERTIFICATION

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by Telefonica International Wholesale Services USA, Inc.

I hereby certify for Telefonica International Wholesale Services USA, Inc. that Telefonica International Wholesale Services USA, Inc. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Eduardo Saravia
President

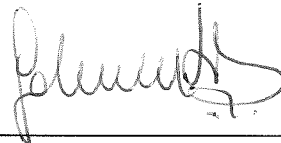
Telefonica International Wholesale Services USA, Inc.
1111 Brickell Avenue, suite 1800
Miami, Florida 33131-3122, U.S.A.
Tel: (305) 925 5256

Date: 1.14.2013

CERTIFICATION

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by Telefónica International Wholesale Services América S.A.

I hereby certify for Telefónica International Wholesale Services América S.A. that Telefónica International Wholesale Services América S.A. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Gabriel Rizzo
Attorney at law
Telefónica International Wholesale Services
América S.A.
Av. Luis A. de Herrera 1248, 4th Floor –
11300 Montevideo, Uruguay

Tel: + 598 2 628 00 20

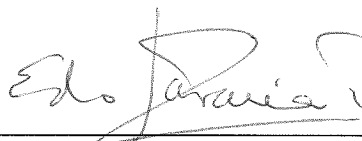
Date: _____

1/14/2013

CERTIFICATION

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by TI Wholesale Services Puerto Rico, Inc.

I hereby certify for TI Wholesale Services Puerto Rico, Inc. that TI Wholesale Services Puerto Rico, Inc. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Eduardo Saravia
President
TI Wholesale Services Puerto Rico, Inc.
1111 Brickell Avenue, suite 1800
Miami, Florida 33131-3122, U.S.A.
Tel: (305) 925 5256

Date: 1/14/2013

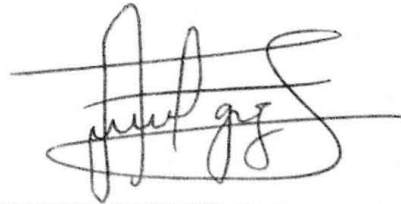
Telefónica

Telefónica International Wholesale Services Colombia S.A.
Transv. 60 No. 114A-55, Cubo Sur, Piso 3
Bogotá, Colombia
Tel. (57-1) 7051730
Fax. (57-1) 7051746

CERTIFICATION

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by Telefónica International Wholesale Services Colombia S.A.

I hereby certify for Telefónica International Wholesale Services Colombia S.A. that Telefónica International Wholesale Services Colombia S.A. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.



Arbey Gomez
Legal Representative
Telefonica International Wholesale Services
Colombia S.A.
Tranversal 60 (Av. Suba) No. 114 A - 55
Cubo Sur, Bogotá D.C. - Colombia
Tel: + 57 1 70 51 741

Date: January 14, 2013

CERTIFICATION

I am authorized to enter this certification in connection with the Application for a Submarine Cable Landing License by the members of the Pacific Caribbean Cable System Consortium (the "PCCS Consortium").

I hereby certify for Antelecom N.V. that Antelecom N.V. is aware of the requirements of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (CZMA), and will abide by the CZMA and the National Oceanic and Atmospheric Administration (NOAA) rules implementing the CZMA, 15 C.F.R. part 930, subpart D.

Date:

Jan 15, 2013

By



P. J. de Geus
Chief Executive Officer
Antelecom N.V.
Rigelweg 2
Willemstad, Curacao
Tel: + 5999 7770101

For and on behalf of Antelecom N.V.

APPENDIX A — CABLE AND WIRELESS (BVI) LIMITED

Cable and Wireless (BVI) Limited is a company duly incorporated under the laws of the British Virgin Islands, with its registered office at Craigmuir Chambers, P.O. Box 71, Road Town, Tortola, British Virgin Islands and having a business office at P.O. Box 440, Road Town, Tortola, British Virgin Islands. Cable and Wireless (BVI) Limited is a competitive telecommunications provider. It provides retail, fixed, cellular and broadband services, connecting customers regionally and internationally. It also provides wholesale voice, Internet and data services. It provides telecommunications services to 16 islands in the BVI, from Anegada to Jost van Dyke. Cable and Wireless (BVI) Limited has made a considerable investment in providing a variety of different connections to the rest of the world. The company is using a leading-edge fiber optic technology to link the BVI directly to the USA, the UK, Europe, Puerto Rico and the US Virgin Islands. For example, the Eastern Caribbean Fiber System has extended optical quality connections throughout the region. Cable and Wireless (BVI) Limited is an indirect, wholly-owned subsidiary of Cable & Wireless Communications Plc who, through its affiliates, operates an advanced submarine cable network, serves millions of customers around the world, including residential, small-business, wholesale, enterprise, global and government customers, and delivers a portfolio of traditional and IP-based voice, broadband Internet, data transport, wireless and video services.

Cable and Wireless (BVI) has obtained FRN #0022340699.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Cable and Wireless (BVI) Limited
Craigmuir Chambers, P.O. Box 71

Road Town, Tortola
British Virgin Islands
Tel: +1 (284) 852 8711

(2) Place of Formation

British Virgin Islands

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

Felix Camargo Ardines
Executive Director
Cable & Wireless Panama S.A.
P.O. Box 0834-00659
Panama, Republic of Panama
felix.camargo@cw.com
Tel: +507 208 3110
Fax +507 263 3066

With copies to:
Andre Odendaal
C&W Communications plc
Floor 3
26 Red Lion Square
London, UK
WC1R4HQ
andre.odendaal@cw.com
Tel: +44 207 315 5256
Fax: +44 207 315 5211

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

Information requested by Section 63.18(h):

Cable and Wireless (BVI) Limited is a direct, wholly-owned subsidiary of Cable and Wireless (West Indies) Limited, a company registered in England and Wales, who, in turn, is a wholly-owned subsidiary of CWI Group Limited. CWI Group Limited, a company registered in England and Wales, is a wholly-owned subsidiary of Sable Holding Limited, a company registered in England and Wales. Sable Holding Limited is a wholly-owned subsidiary of Cable

& Wireless Limited, a company registered in England and Wales, who, in turn is wholly-owned by Cable & Wireless Communications Plc, a publicly-held company registered in England and Wales. The address for Cable and Wireless (West Indies) Limited, CWI Group Limited, Sable Holding Limited, Cable & Wireless Limited and Cable & Wireless Communications Plc is 26 Red Lion Square, 3rd Floor, London WC1R 4HQ, United Kingdom.

As of the date of filing of this Application, Orbis Holdings Limited owns more than 10% of Cable & Wireless Communications Plc. Orbis Holdings Limited is organized under the laws of Bermuda, is located at Orbis house, Front Street, Hamilton HM 11, Bermuda, PO Box HM 571 and is primarily in the business of institutional investment management. As of the date of filing of this Application, Newton Investment Management Limited owns 10% of Cable & Wireless Communications Plc. Newton Investment Management Limited is organized under the laws of the United Kingdom and is located at The Bank Of New York Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA, United Kingdom. Newton Investment Management Limited is a wholly owned subsidiary of The Bank of New York Mellon Corporation.

Interlocking Directorate: David Shaw, a member of Cable and Wireless (BVI) Limited's board of directors, is also a member of the board of directors of the following foreign carriers:

- Cable & Wireless (Barbados) Limited
- Cable & Wireless (St. Lucia) Limited
- Cable & Wireless Antigua & Barbuda Limited
- Cable & Wireless Jamaica Limited
- Cable & Wireless St Vincent and the Grenadines Limited
- Cable and Wireless (Anguilla) Limited
- Cable and Wireless (TCI) Limited
- Cable and Wireless (Cayman Islands) Limited
- Telecommunications Services of Trinidad and Tobago Limited
- The Bahamas Telecommunications Company Limited

Clare Underwood, a member of Cable and Wireless (BVI) Limited's board of directors, is also a member of the board of directors of the following foreign carriers:

- Cable & Wireless (St. Lucia) Limited
- Cable & Wireless Antigua & Barbuda Limited
- Cable & Wireless St Vincent and the Grenadines Limited
- Cable and Wireless (Anguilla) Limited
- Cable and Wireless (Cayman Islands) Limited
- Cable and Wireless (TCI) Limited
- Cable and Wireless (West Indies) Limited, Montserrat branch

Davidson Charles, a member of Cable and Wireless (BVI) Limited's board of directors, is also a member of the board of directors of the following foreign carriers:

- Cable & Wireless (Anguilla) Limited
- Cable & Wireless (TCI) Limited
- Cable & Wireless St. Kitts & Nevis Limited

Information requested by Section 63.18(i):

Cable and Wireless (BVI) Limited is a foreign carrier. Cable and Wireless (BVI) Limited is affiliated with the following foreign carriers authorized to provide telecommunications services to the public in the countries listed below:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Cable & Wireless (Barbados) Limited***	Barbados
Cable & Wireless (Seychelles) Limited*, ***	Seychelles
Cable & Wireless (St. Lucia) Limited***	St. Lucia
Cable & Wireless Antigua & Barbuda Limited***	Antigua, Barbuda
Cable & Wireless Dominica Limited***	Dominica
Cable & Wireless Grenada Limited***	Grenada
Cable & Wireless Guernsey Limited*, ***	Guernsey
Cable & Wireless Isle of Man Limited*, ***	Isle of Man
Cable & Wireless Jamaica Limited***	Jamaica
Cable & Wireless Jersey Limited*, ***	Jersey
Cable & Wireless South Atlantic Limited (Ascension Island)*, ***	Ascension Island, St Helena, Falkland Islands

Cable & Wireless St Vincent and the Grenadines Limited***	St. Vincent, and the Grenadines
Cable & Wireless St. Kitts & Nevis Limited***	St. Kitts, Nevis
Cable and Wireless (Anguilla) Limited***	Anguilla
Cable and Wireless (Cayman Islands) Limited***	Cayman Islands
Cable and Wireless (Diego Garcia) Limited*; ***	Diego Garcia
Cable and Wireless (Panama) SA***	Panama
Cable and Wireless (TCI) Limited***	Turks and Caicos Islands
Cable and Wireless (West Indies) Limited, Montserrat branch***	Montserrat
Cable and Wireless Network Services Limited	Bermuda
Caribbean Landing Company Limited	Jamaica
Companhia de Telecomunicações de Macau S.A.R.L. ***; ****	Macau
CTM (HK) Limited****	Hong Kong
Dhivehi Raajjeyge Gulhun PLC*; ***	Maldives
Divona Algerie SPA*	Algeria
Jamaica Digiport International Limited	Jamaica
Monaco Telecom International S.A.M**	Monaco
Monaco Telecom S.A.M**, ***	Monaco
Seychelles Cable System Limited **, ***	Seychelles
Solomon Telekom Company Limited*; ***	Solomon Islands
Telecom Development Company Afghanistan Ltd*	Afghanistan (cellular only)
Telecommunications Services of Trinidad and Tobago Limited***	Trinidad & Tobago
The Bahamas Telecommunications Company Limited***	Bahamas
TeleOne (Singapore) Pte Limited****	Singapore

* On December 3, 2012, Cable & Wireless Communications Plc entered into an agreement to sell 100% of its interest in these carriers to Bahrain Telecommunications Company (“Batelco”). Closing is expected promptly upon obtaining all necessary approvals and satisfying all necessary conditions.

** Cable & Wireless Communications Plc currently holds a 55% ownership interest in Monaco Telecom S.A.M. through Compagnie Monegasque de Communication SAM (“CMC”) and Monaco Telecom International S.A.M. is a wholly-owned subsidiary of Monaco Telecom S.A.M. As part of its transaction with Batelco, Cable & Wireless Communications Plc will sell a 25% interest in CMC to Batelco and which contains certain put and call arrangements with respect to Cable & Wireless Communications Plc’s remaining 75% interest in CMC.

*** These carriers are presumed by the Commission to have market power in the identified markets. *See 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). Cable & Wireless (West Indies) Limited is the 100% owner of Cable and Wireless (BVI) Limited.

**** On January 13, 2013, Cable & Wire Communications Plc (CWC) entered into an agreement with CITIC Telecom International Holdings Limited (“CITIC Telecom”) for the sale of CWC’s 51% stake in Companhia de Telecomunicações de Macau S.A.R.L (CTM). CWC’s controlling 51% stake, held through its wholly-owned subsidiary Sable Holding Limited, will be acquired by CITIC Telecom, which holds an existing 20% shareholding in CTM. Concurrently with the sale, CITIC Telecom has agreed with Portugal Telecom (“PT”) to acquire its 28% stake in CTM (the “PT Disposal”). Both CWC’s sale and the PT Disposal are conditional on the completion of each other. At completion of both transactions, CITIC Telecom will own 99% of CTM.

Information requested by Section 63.18(j):

Cable and Wireless (BVI) Limited is affiliated with foreign carriers in two destination (PCCS landing) countries -- the British Virgin Islands and Panama. Cable and Wireless (BVI) Limited is not affiliated with any foreign carrier in any other destination (PCCS landing station) country.

Information requested by Section 63.18(k):

The British Virgin Islands and Panama are members of the WTO.

Information requested by Section 63.18(o):

Cable and Wireless (BVI) Limited certifies pursuant to Sections 1.2001 through 1.2003 of the Commission’s rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Cable and Wireless (BVI) Limited 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).

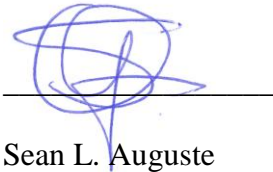
II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

Cable and Wireless (BVI) Limited certifies that it is a foreign carrier and is not affiliated with a foreign carrier in any of the cable's landing station markets except as indicated above.

CERTIFICATION

I am authorized to enter this certification on behalf of Cable and Wireless (BVI) Limited.

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



Sean L. Auguste
General Manager
Flemming Street
Road Town, Tortola
P. O. Box 440
284 - 852 - 8710/1

For and on behalf of Cable and Wireless (BVI) Limited

Date: January 14, 2013

APPENDIX B — CABLE & WIRELESS (EWC) LIMITED

Cable & Wireless (EWC) Limited is a company duly incorporated under the laws of the British Virgin Islands, with its registered office at Craigmuir Chambers, P.O. Box 71, Road Town, Tortola, British Virgin Islands (herein called “Cable & Wireless EWC”). Cable & Wireless EWC is an indirect, wholly-owned subsidiary of Cable & Wireless Communications Plc and sells submarine cable capacity internationally.

Cable & Wireless (EWC) has obtained FRN #0022340715.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

CABLE & WIRELESS (EWC) LIMITED
Craigmuir Chambers,
P.O. Box 71, Road Town,
Tortola, British Virgin Islands
Tel: +1 (284) 852 8711

(2) Place of Formation

Cable & Wireless (EWC) Limited is a corporation organized under the laws of the British Virgin Islands.

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

Felix Camargo Ardines
Executive Director
Cable & Wireless Panama S.A.
P.O. Box 0834-00659
Panama, Republic of Panama
felix.camargo@cwc.com
Tel: +507 208 3110
Fax: +507 263 3066

With copies to:

Andre Odendaal

C&W Communications plc
Floor 3
26 Red Lion Square
London, UK
WC1R4HQ
andre.odendaal@cwc.com
Tel: +44 207 315 5256
Fax: +44 207 315 5211

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

Information requested by Section 63.18(h):

Cable & Wireless (EWC) Limited is a direct, wholly-owned subsidiary of Cable and Wireless (West Indies) Limited, a company registered in England and Wales, who, in turn, is a wholly-owned subsidiary of CWI Group Limited. CWI Group Limited, a company registered in England and Wales, is a wholly-owned subsidiary of Sable Holding Limited, a company registered in England and Wales. Sable Holding Limited is a wholly-owned subsidiary of Cable & Wireless Limited, a company registered in England and Wales, who, in turn is wholly-owned by Cable & Wireless Communications Plc, a publicly-held company registered in England and Wales. The address for Cable and Wireless (West Indies) Limited, CWI Group Limited, Sable Holding Limited, Cable & Wireless Limited and Cable & Wireless Communications Plc is 26 Red Lion Square, 3rd Floor, London WC1R 4HQ, United Kingdom.

As of the date of filing of this Application, Orbis Holdings Limited owns more than 10% of Cable & Wireless Communications Plc. Orbis Holdings Limited is organized under the laws of Bermuda, is located at Orbis house, Front Street, Hamilton HM 11, Bermuda PO Box HM 571 and is primarily in the business of institutional investment management. As of the date of filing of this Application, Newton Investment Management Limited owns 10% of Cable & Wireless Communications Plc. Newton Investment Management Limited is organized under the laws of

the United Kingdom and is located at The Bank Of New York Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA, United Kingdom. Newton Investment Management Limited is a wholly owned subsidiary of The Bank of New York Mellon Corporation.

Interlocking Directorate: No member of Cable & Wireless (EWC) Limited’s board of directors is a board member of a foreign carrier.

Information requested by Section 63.18(i):

Cable & Wireless (EWC) Limited is not a foreign carrier. Cable & Wireless (EWC) Limited is affiliated with the following foreign carriers authorized to provide telecommunications services to the public in the countries listed below:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Cable and Wireless (BVI) Limited***	British Virgin Islands
Cable & Wireless (Barbados) Limited***	Barbados
Cable & Wireless (Seychelles) Limited*, ***	Seychelles
Cable & Wireless (St. Lucia) Limited***	St. Lucia
Cable & Wireless Antigua & Barbuda Limited***	Antigua, Barbuda
Cable & Wireless Dominica Limited***	Dominica
Cable & Wireless Grenada Limited***	Grenada
Cable & Wireless Guernsey Limited*, ***	Guernsey
Cable & Wireless Isle of Man Limited*, ***	Isle of Man
Cable & Wireless Jamaica Limited***	Jamaica
Cable & Wireless Jersey Limited*, ***	Jersey
Cable & Wireless South Atlantic Limited (Ascension Island)*; ***	Ascension Island, St Helena, Falkland Islands
Cable & Wireless St Vincent and the Grenadines Limited***	St. Vincent, and the Grenadines
Cable & Wireless St. Kitts & Nevis Limited***	St. Kitts, Nevis
Cable and Wireless (Anguilla) Limited***	Anguilla
Cable and Wireless (Cayman Islands) Limited***	Cayman Islands
Cable and Wireless (Diego Garcia) Limited*, ***	Diego Garcia
Cable and Wireless (Panama) SA***	Panama
Cable and Wireless (TCI) Limited***	Turks and Caicos Islands
Cable and Wireless (West Indies) Limited, Montserrat branch***	Montserrat

Cable and Wireless Network Services Limited	Bermuda
Caribbean Landing Company Limited	Jamaica
Companhia de Telecomunicações de Macau S.A.R.L. ***; ****	Macau
CTM (HK) Limited****	Hong Kong
Dhivehi Raajjeyge Gulhun PLC*; ***	Maldives
Divona Algerie SPA*	Algeria
Jamaica Digiport International Limited	Jamaica
Monaco Telecom International S.A.M**	Monaco
Monaco Telecom S.A.M**, ***	Monaco
Seychelles Cable System Limited **, ***	Seychelles
Solomon Telekom Company Limited*; ***	Solomon Islands
Telecom Development Company Afghanistan Ltd*	Afghanistan (cellular only)
Telecommunications Services of Trinidad and Tobago Limited***	Trinidad & Tobago
The Bahamas Telecommunications Company Limited***	Bahamas
TeleOne (Singapore) Pte Limited****	Singapore

* On December 3, 2012, Cable & Wireless Communications Plc entered into an agreement to sell 100% of its interest in these carriers to Bahrain Telecommunications Company (“Batelco”). Closing is expected promptly upon obtaining all necessary approvals and satisfying all necessary conditions.

** Cable & Wireless Communications Plc currently holds a 55% ownership interest in Monaco Telecom S.A.M. through Compagnie Monegasque de Communication SAM (“CMC”) and Monaco Telecom International S.A.M. is a wholly-owned subsidiary of Monaco Telecom S.A.M. As part of its transaction with Batelco, Cable & Wireless Communications Plc will sell a 25% interest in CMC to Batelco and which contains certain put and call arrangements with respect to Cable & Wireless Communications Plc’s remaining 75% interest in CMC.

*** These carriers are presumed by the Commission to have market power in the identified markets. *See 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). Cable & Wireless (West Indies) Limited is the 100% owner of Cable and Wireless (BVI) Limited.

**** On January 13, 2013, Cable & Wire Communications Plc (CWC) entered into an agreement with CITIC Telecom International Holdings Limited (“CITIC Telecom”) for the sale of CWC’s 51% stake in Companhia de Telecomunicações de Macau S.A.R.L (CTM). CWC’s controlling 51% stake, held through its wholly-owned subsidiary Sable Holding Limited, will be acquired by CITIC Telecom, which holds an existing 20% shareholding in CTM. Concurrently with the sale, CITIC Telecom has agreed with Portugal Telecom (“PT”) to acquire its 28% stake in CTM (the “PT Disposal”). Both CWC’s sale and the PT Disposal are conditional on the completion of each other. At completion of both transactions, CITIC Telecom will own 99% of CTM.

Information requested by Section 63.18(j):

Cable & Wireless (EWC) Limited is not a foreign carrier but is affiliated with foreign carriers in two destination (PCCS landing) countries -- the British Virgin Islands and Panama. Cable & Wireless (EWC) Limited is not affiliated with any foreign carrier in any other destination (PCCS landing station) country.

Information requested by Section 63.18(k):

The British Virgin Islands and Panama are members of the WTO.

Information requested by Section 63.18(o):

Cable & Wireless (EWC) Limited certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Cable & Wireless (EWC) Limited 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

Cable & Wireless (EWC) Limited hereby certifies that it is not a foreign carrier and that, with respect to the destination countries for the PCCS, it is affiliated with foreign carriers in the **British Virgin Islands**: Cable and Wireless (BVI) Limited; and **Panama**: Cable & Wireless Panama S.A.; each of which is a member of the WTO. Under Sections 1.767(k)(2) and 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. §§ 1.767(k)(2); 63.12(c)(1)(ii), Cable & Wireless (EWC) Limited qualifies for a presumption of non-dominance under Section

63.10(a)(3), 47 C.F.R. § 63.10(a)(3), because although it is affiliated with a foreign carrier in Panama and the British Virgin Islands that is presumed to have market power, both those countries are members of the WTO. Cable & Wireless (EWC) Limited certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in any of the other PCCS destination markets and that it agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(1).

CERTIFICATION

I am authorized to enter this certification on behalf of Cable and Wireless (EWC) Limited.

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

Date: January 14, 2013

By ___



[Name] Ronald Joseph
[Title] CFO
Cable and Wireless (EWC) Limited
Address: Corinth
Gros- Islet
Tel: 758-484-1359
Fax: 758-45-39000

APPENDIX C — CABLE & WIRELESS PANAMA S.A.

Cable & Wireless Panama S.A. is a company duly incorporated under the laws of the Republic of Panama, with its registered office at Condominio Plaza Internacional, Vía España, Torre B y C, Panamá, República de Panamá (herein called “CWP”). Forty-nine percent of CWP stock is owned by CWC CALA Holdings Limited. CALA Holdings Limited is a wholly owned indirect subsidiary of Cable & Wireless Communications plc (“CWC”). Forty-nine percent of CWP stock is owned by the Government of the Republic of Panama, however CWC has management control, and two percent of CWP stock is owned by Banco General, S.A., Trust whose beneficiaries are CWP’s employees.

Cable & Wireless Panama S.A. is a local telecommunications service provider, of national and international long distance telecommunications, wholesale and retail mobile services, broadband, Cable TV, and others telecommunications services. It also provides services to other telecommunications carriers or service providers, and provides services directed to the public.

Through its wholly owned company, Des Vieux Telecoms Inc., Cable & Wireless Panama S.A. has obtained the FCC’s Section 214 authorization.

Cable & Wireless Panama S.A. has obtained FRN #0022345060.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Cable & Wireless Panama S.A.
Condominio Plaza
Internacional, Vía España,
Torre C, Panamá
República of Panamá
Tel: (+ 507) 263-4459

(2) Place of Formation

Cable & Wireless Panama S.A. is a corporation organized under the laws of the Republic of Panama.

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

Alex Arroyo Executive Director of Regulatory Affairs and Interconnection
Cable & Wireless Panama S.A.
P.O. Box 0834-00659
Panama, Republic of Panama
Alex.arroyo@cwpanama.com
Tel: +507 263-4459
Fax: +507 263-5364

With copies to:

Andre Odendaal
C&W Communications plc
Floor 3
26 Red Lion Square
London, UK
WC1R4HQ
andre.odendaal@cwc.com
Tel: +44 207 315 5256
Fax: +44 207 315 5211

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

Information requested by Section 63.18(h):

Cable & Wireless Panama S.A. is a subsidiary of Cable & Wireless Communications plc, which is a publicly traded corporation whose stock is widely held by the public. The address of Cable & Wireless Communications plc is 26 Red Lion Square, London WC1 R4HQ UK, and it incorporated under the laws of England & Wales.

As of the date of filing of this Application, Orbis Holdings Limited owns more than 10% of Cable & Wireless Communications Plc. Orbis Holdings Limited is organized under the laws of Bermuda, is located at Orbis house, Front Street, Hamilton HM 11, Bermuda PO Box HM 571 and is primarily in the business of institutional investment management. As of the date of filing of this Application, Newton Investment Management Limited owns 10% of Cable & Wireless Communications Plc. Newton Investment Management Limited is organized under the laws of the United Kingdom and is located at The Bank Of New York Mellon Centre, 160 Queen Victoria Street, London EC4V 4LA, United Kingdom. Newton Investment Management Limited is a wholly owned subsidiary of The Bank of New York Mellon Corporation.

Interlocking Directorate: Tim Pennington, a member of Cable & Wireless Panama S.A.'s board of directors, is also a member of the board of directors of the following foreign carriers:

Cable & Wireless (Barbados) Limited
Cable & Wireless (West Indies) Limited, Montserrat branch
Companhia de Telecomunicações de Macau S.A.R.L.
Telecommunications Services of Trinidad and Tobago Limited

Sheldon Bruha, a member of Cable & Wireless Panama S.A.'s board of directors, is also a member of the board of directors of foreign carrier Dhivehi Raajjeyge Gulhun PLC.

Information requested by Section 63.18(i):

Cable & Wireless Panama S.A. is a foreign carrier. Cable & Wireless Panama S.A. is affiliated with the following foreign carriers authorized to provide telecommunications services to the public in the countries listed below:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Cable and Wireless (BVI) Limited***	British Virgin Islands
Cable & Wireless (Barbados) Limited***	Barbados
Cable & Wireless (Seychelles) Limited*, ***	Seychelles
Cable & Wireless (St. Lucia) Limited***	St. Lucia
Cable & Wireless Antigua & Barbuda Limited***	Antigua, Barbuda
Cable & Wireless Dominica Limited***	Dominica
Cable & Wireless Grenada Limited***	Grenada
Cable & Wireless Guernsey Limited*, ***	Guernsey
Cable & Wireless Isle of Man Limited*, ***	Isle of Man
Cable & Wireless Jamaica Limited***	Jamaica
Cable & Wireless Jersey Limited*, ***	Jersey
Cable & Wireless South Atlantic Limited (Ascension Island)*, ***	Ascension Island, St Helena, Falkland Islands
Cable & Wireless St Vincent and the Grenadines Limited***	St. Vincent, and the Grenadines
Cable & Wireless St. Kitts & Nevis Limited***	St. Kitts, Nevis
Cable and Wireless (Anguilla) Limited***	Anguilla
Cable and Wireless (Cayman Islands) Limited***	Cayman Islands
Cable and Wireless (Diego Garcia) Limited*, ***	Diego Garcia
Cable and Wireless (Panama) SA***	Panama
Cable and Wireless (TCI) Limited***	Turks and Caicos Islands
Cable and Wireless (West Indies) Limited, Montserrat branch***	Montserrat
Cable and Wireless Network Services Limited	Bermuda
Caribbean Landing Company Limited	Jamaica
Companhia de Telecomunicações de Macau S.A.R.L. ***, ****	Macau
CTM (HK) Limited****	Hong Kong
Dhivehi Raajjeyge Gulhun PLC*, ***	Maldives
Divona Algerie SPA*	Algeria
Jamaica Digiport International Limited	Jamaica
Monaco Telecom International S.A.M**	Monaco
Monaco Telecom S.A.M**, ***	Monaco
Seychelles Cable System Limited **, ***	Seychelles
Solomon Telekom Company Limited*, ***	Solomon Islands
Telecom Development Company Afghanistan Ltd*	Afghanistan (cellular only)
Telecommunications Services of Trinidad and Tobago Limited***	Trinidad & Tobago

The Bahamas Telecommunications Company Limited***	Bahamas
TeleOne (Singapore) Pte Limited****	Singapore

* On December 3, 2012, Cable & Wireless Communications Plc entered into an agreement to sell 100% of its interest in these carriers to Bahrain Telecommunications Company (“Batelco”). Closing is expected promptly upon obtaining all necessary approvals and satisfying all necessary conditions.

** Cable & Wireless Communications Plc currently holds a 55% ownership interest in Monaco Telecom S.A.M. through Compagnie Monegasque de Communication SAM (“CMC”) and Monaco Telecom International S.A.M. is a wholly-owned subsidiary of Monaco Telecom S.A.M. As part of its transaction with Batelco, Cable & Wireless Communications Plc will sell a 25% interest in CMC to Batelco and which contains certain put and call arrangements with respect to Cable & Wireless Communications Plc’s remaining 75% interest in CMC.

*** These carriers are presumed by the Commission to have market power in the identified markets. *See 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). Cable & Wireless (West Indies) Limited is the 100% owner of Cable and Wireless (BVI) Limited.

**** On January 13, 2013, Cable & Wire Communications Plc (CWC) entered into an agreement with CITIC Telecom International Holdings Limited (“CITIC Telecom”) for the sale of CWC’s 51% stake in Companhia de Telecomunicações de Macau S.A.R.L (CTM). CWC’s controlling 51% stake, held through its wholly-owned subsidiary Sable Holding Limited, will be acquired by CITIC Telecom, which holds an existing 20% shareholding in CTM. Concurrently with the sale, CITIC Telecom has agreed with Portugal Telecom (“PT”) to acquire its 28% stake in CTM (the “PT Disposal”). Both CWC’s sale and the PT Disposal are conditional on the completion of each other. At completion of both transactions, CITIC Telecom will own 99% of CTM.

Information requested by Section 63.18(j):

Cable & Wireless Panama S.A. is a foreign carrier in one destination (PCCS landing) country, Panama, and is affiliated with a foreign carrier in another destination (PCCS landing) country, the British Virgin Islands. Cable & Wireless Panama S.A. is not affiliated with any foreign carrier in any other destination (PCCS landing) country.

Information requested by Section 63.18(k):

Panama and the British Virgin Islands are members of the WTO.

Information requested by Section 63.18(o):

Cable & Wireless Panama S.A. certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Cable & Wireless Panama S.A. 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

Cable & Wireless Panama S.A. hereby certifies that it is a foreign carrier in one designation market for the PCCS—**Panama**—and that, with respect to the other destination countries for the PCCS, it is affiliated with a foreign carrier in the **British Virgin Islands**: Cable and Wireless (BVI) Limited. Both Panama and the British Virgin Islands are members of the WTO. Under Sections 1.767(k)(2) and 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. §§ 1.767(k)(2); 63.12(c)(1)(ii), Cable & Wireless Panama S.A. qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), because while in Panama it is presumed to have market power and in the British Virgin Islands it is affiliated with a foreign carrier that is presumed to have market power, both those countries are members of the WTO. Cable & Wireless Panama S.A. certifies that it is not affiliated with a foreign carrier in any of the other PCCS destination markets and that it agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(1).

CERTIFICATION

I am authorized to enter this certification on behalf of Cable & Wireless Panama S.A.

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

By 

Alex Arroyo
Executive Director of Regulatory Affairs and
Interconnection

Cable & Wireless Panama S.A.
Address: Plaza Internacional, Via España
Torre C, Piso 2
Tel: (507) 882-2036
Fax: (507) 263-5364

Date: January 14, 2013



APPENDIX D — SERVICIO DI TELECOMUNICACION DI ARUBA N.V. (SETAR)

Servicio Di Telecomunicacion Di Aruba N.V. (SETAR) is a Limited Liability Company organized and existing under the laws of Aruba, and having its principal office at the Administration Building in Seroe Blanco, Oranjestad, Aruba (herein called “SETAR”). SETAR N.V., Aruba’s national telecommunication provider is the principal telecommunication company on the island. SETAR N.V. provides solutions for Fixed line, Mobile, Internet and Data. For international telecommunications, SETAR N.V. connects to the outside world via circuit switches and VoIP platforms. The international network of SETAR N.V. consists of two earth stations and fiber submarine cables via the Pan American and Alonso de Ojeda / Americas-2 cable systems.

Servicio Di Telecomunicacion Di Aruba N.V. (SETAR) has obtained FRN #0022340731.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Servicio Di Telecomunicacion Di Aruba N.V.(SETAR)
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: +297 525-1000

(2) Place of Formation

Aruba

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

Ricky Felix
International Network Manager
Servicio Di Telecomunicacion Di Aruba N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: +297 525-1445

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

Information requested by Section 63.18(h):

SETAR is wholly-owned by the Government of Aruba and overseen by the Ministry of Telecommunications of Aruba. The address of the Ministry of Telecommunications of Aruba is L.G. Smith Boulevard 72, Oranjestad, Aruba.

Interlocking Directorates: A member of SETAR's board of directors, Mr. Zenovio Roland Croes is also a member of the board of directors of a foreign carrier, T.A. Resources N.V.

Information requested by Section 63.18(i):

SETAR is a foreign carrier in Aruba and its subsidiary, T.A. Resources, N.V., is the holder of a Commission authorization under Section 214 of the Communications Act. *See* ITC-214-20100107-00010. SETAR has no other affiliations with foreign carriers in any other destination (PCCS landing) country.

Information requested by Section 63.18(j):

SETAR is a foreign carrier in one destination (PCCS landing) country -- Aruba. SETAR does not hold any authorizations issued by the Commission although its subsidiary, TA Resources, holds a Commission authorization under Section 214 of the Communications Act.

Information requested by Section 63.18(k):

Aruba is not a member of the WTO but, in 2011, the Commission successfully applied the ECO test to Aruba.

Information requested by Section 63.18(o):

SETAR certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

SETAR 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

SETAR certifies that it is a foreign carrier in Aruba and is not affiliated with a foreign carrier in any of the PCCS's landing station markets except for Aruba. In 2011, the Commission successfully applied the ECO test to Aruba while granting an international section 214 authorization to SETAR's wholly-owned subsidiary, TA Resources S.A.

CERTIFICATION

I am authorized to enter this certification on behalf of Servicio Di Telecomunicacion Di Aruba N.V.

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

Date: January 14, 2013

By 

Ricky Felix
International Network Manager
Servicio Di Telecomunicacion Di Aruba N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: + 297 525-1445

APPENDIX E — CABLE ANDINO INC.

Cable Andino Inc. is a Bahamas corporation wholly owned by Telconet S.A. who has its principal place of business in Ecuador. Cable Andino, Inc. holds Section 214 global authority to provide all facilities-based and resale services, including to the countries which have the landing stations that form part of this application. *See, e.g.*, ITC-214-20031103-00504 (global facilities based on resale services).

Cable Andino Inc. has obtained FRN #0022340780.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Cable Andino, Inc.
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

(2) Place of Formation

Bahamas

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

Carlos Pazmiño
General Manager
Cable Andino, Inc.
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

With copies to:

Tomislav Topic

Ciudadela Nueva Kennedy
MZ.109 SOLAR 21
Guayaquil, Ecuador
Tel: +59342680555
ttopic@telconet.ec

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

Information requested by Section 63.18(h):

Cable Andino, Inc. is a direct, wholly-owned subsidiary of Telconet S.A., Ciudadela Nueva Kennedy MZ 109, SOLAR 21, Guayaquil, Ecuador. Telconet S.A. was incorporated under the laws of Ecuador. Telconet S.A. is owned 54% by Marion Tomislav Topic, an Ecuadorian citizen and 46% by Jan Tomislav Topic, also an Ecuadorian citizen. Telconet S.A. provides data transport and Internet access services to the public in Ecuador.

Interlocking Directorates: Tomislav Topic Granados is a member of Cable Andino Inc.'s board of directors and is also on the board of Telconet S.A.

Carlos Pazmino is a member of Cable Andino Inc.'s board of directors and is also on the board of Cable Andino S.A. Corpandino

Information requested by Section 63.18(i):

Cable Andino, Inc. is a foreign carrier but is not affiliated with any foreign carriers authorized to provide telecommunications services to the public except for its parent company, Telconet S.A.

Information requested by Section 63.18(j):

Cable Andino, Inc. is not affiliated with any foreign carrier in any destination (PCCS landing station) country except for its parent company, Telconet S.A. in Ecuador.

Information requested by Section 63.18(k):

Ecuador is a member of the WTO.

Information requested by Section 63.18(o):

Cable Andino, Inc. certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Cable Andino, Inc. 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

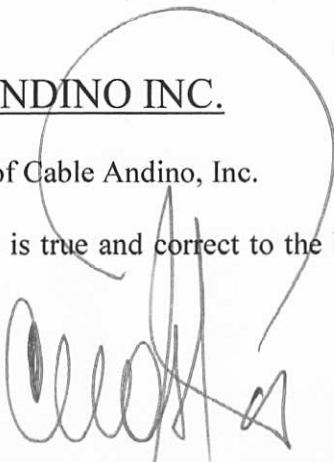
Cable Andino, Inc. certifies that it is a foreign carrier and is not affiliated with a foreign carrier in any of the cable's landing station markets except as indicated above.

CERTIFICATION CABLE ANDINO INC.

I am authorized to enter this certification on behalf of Cable Andino, Inc.

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

Date: January 14, 2013


By _____
Carlos Pazmiño
General Manager
Cable Andino, Inc. dba Telconet
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

APPENDIX F — CABLE ANDINO USA, INC.

Cable Andino USA, Inc. is a Florida State corporation, with its registered office at 1100 NW 163rd Drive. Miami, Florida 33169 (herein called “Cable Andino USA”). Cable Andino USA, Inc. does not yet provide any services.

Cable Andino USA, Inc. has obtained FRN #0022349161.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Cable Andino USA, Inc.
1100 NW 163rd Drive
Miami, FL 33169
Tel: (305) 777-8007
Fax: (305) 777-8007

(2) Place of Formation

Florida, USA

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

Carlos Pazmiño
President
Cable Andino USA, Inc.
1100 NW 163rd Drive
Miami, FL 33169
Tel: (305) 777-8007
Fax: (305) 777-8007

With copies to:

Tomislav Topic
Ciudadela Nueva Kennedy
MZ.109 SOLAR 21
Guayaquil, Ecuador
Tel: +59342680555
ttopic@telconet.ec

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

Information requested by Section 63.18(h):

Cable Andino USA, Inc. is a direct, wholly-owned subsidiary of Cable Andino, Inc. (Bahamas), V.M. Rendon 401, 7th Floor, Suite 704, Guayaquil, Ecuador. Cable Andino, Inc. is a direct, wholly-owned subsidiary of Telconet S.A., Ciudadela Nueva Kennedy Mz.109 solar 21 Guayaquil, Ecuador. Telconet S.A. is a telecommunications holding company incorporated under the laws of Ecuador. Telconet S.A. is owned 54% by Marion Tomislav Topic, an Ecuadorian citizen and 46% by Jan Tomislav Topic, also an Ecuadorian citizen.

Interlocking Directorates: Tomislav Topic Granados is a member of Cable Andino USA Inc.'s board of directors and is also on the board of the following foreign carriers:

Telconet S.A.
Cable Andino Inc.

Carlos Pazmino is a member of Cable Andino USA Inc.'s board of directors and is also on the board of the following foreign carriers:

Cable Andino Inc.
Cable Andino S.A. Corpandino

Information requested by Section 63.18(i):

Cable Andino USA, Inc. is not a foreign carrier. Cable Andino USA, Inc. is affiliated with Cable Andino, Inc. which is a foreign carrier in one destination (PCCS landing) country -- Ecuador. Cable Andino USA, Inc. is not affiliated with any other foreign carriers authorized to provide telecommunications services to the public except for its parent company, Telconet S.A. in Ecuador.

Information requested by Section 63.18(j):

Cable Andino USA, Inc. is affiliated with Cable Andino, Inc. which is a foreign carrier in one destination (PCCS landing station) country -- Ecuador. Cable Andino USA, Inc. is not affiliated with any other foreign carriers authorized to provide telecommunications services to the public except for its parent company, Telconet S.A. Also, Cable Andino USA, Inc. does not hold any authorizations issued by the Commission.

Information requested by Section 63.18(k):

Ecuador is a member of the WTO.

Information requested by Section 63.18(o):

Cable Andino USA, Inc. certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Cable Andino USA, Inc. 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

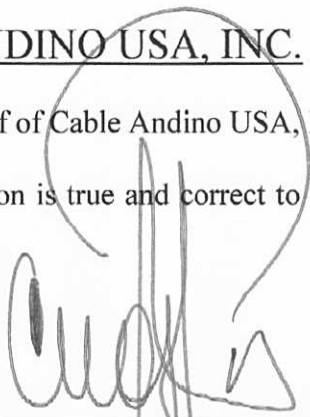
Cable Andino USA, Inc. certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in any of the cable's landing station markets except as indicated above.

CERTIFICATION CABLE ANDINO USA, INC.

I am authorized to enter this certification on behalf of Cable Andino USA, Inc.

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

Date: January 14, 2013


By _____
Carlos Pazmiño
President
Cable Andino USA, Inc.
1100 NW 163rd Drive
Miami, FL 33169
Tel: (305) 777-8007
Fax: (305) 777-8007

APPENDIX G — CABLE ANDINO S.A. CORPANDINO

Cable Andino S.A. Corpandino is a company duly incorporated under the laws of Ecuador, with registered office Calle 15 Av. 24 Edif. Barre II 1er Piso, Manta-Ecuador (herein called “Cable Andino S.A. Corpandino”). Cable Andino S.A. Corpandino will own and operate the Manta cable landing station in Ecuador. It does not provide any telecommunications services.

Cable Andino S.A. Corpandino has obtained FRN #0022340822.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Cable Andino S.A. Corpandino
Calle 15 Av. 24
Edificio Barre II, 1er Piso
Manta, Ecuador
Tel: +59352627839

(2) Place of Formation

Ecuador

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

Carlos Pazmiño
Gerente General
Cable Andino S.A. Corpandino
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

With copies to:

Tomislav Topic
Ciudadela Nueva Kennedy
MZ.109 SOLAR 21

Guayaquil, Ecuador
Tel: +59342680555
ttopic@telconet.ec

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

Information requested by Section 63.18(h):

Cable Andino S.A. Corpandino is owned 52.2% by Giorgio Surian, an Italian citizen, and 47.5% by Telconet S.A., Ciudadela Nueva Kennedy Mz.109 solar 21, Guayaquil, Ecuador. Telconet S.A. is a telecommunications holding company incorporated under the laws of Ecuador. Telconet S.A. is owned 54% by Marion Tomislav Topic, an Ecuadorian citizen and 46% by Jan Tomislav Topic, also an Ecuadorian citizen.

Interlocking Directorates: Carlos Pazmino is a member Cable Andino S.A. Corpandino's board of directors and is also on the board of directors for foreign carrier Cable Andino Inc.

Information requested by Section 63.18(i):

Cable Andino S.A. Corpandino is not a foreign carrier but is affiliated with Cable Andino, Inc. and Telconet S.A. which are foreign carriers in Ecuador. Cable Andino S.A. Corpandino is not affiliated with any other foreign carriers authorized to provide telecommunications services to the public.

Information requested by Section 63.18(j):

Cable Andino S.A. Corpandino is not a foreign carrier but is affiliated with Cable Andino, Inc. and Telconet S.A., foreign carriers in one destination (PCCS landing station)

country -- Ecuador. Also, Cable Andino S.A. Corpandino does not hold any authorizations issued by the Commission.

Information requested by Section 63.18(k):

Ecuador is a member of the WTO.

Information requested by Section 63.18(o):

Cable Andino S.A. Corpandino certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Cable Andino S.A. Corpandino 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

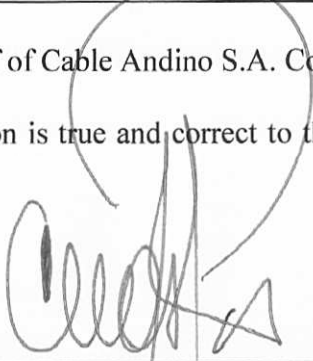
Cable Andino S.A. Corpandino certifies that it not a foreign carrier and is not affiliated with a foreign carrier in any of the cable's landing station markets except as indicated above.

CERTIFICATION CABLE ANDINO S.A. CORPANDINO

I am authorized to enter this certification on behalf of Cable Andino S.A. Corpandino .

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

Date: January 14, 2013


By _____
Carlos Pazmiño
Gerente General
Cable Andino S.A. Corpandino
V.M. Rendon 401
7th Floor, Suite 704
Guayaquil, Ecuador
Tel: +59342560937
Fax: +59342561552

APPENDIX H — TELEFONICA INTERNATIONAL WHOLESALE SERVICES AMERICA S.A.

Telefonica International Wholesale Services América S.A. is an Uruguayan corporation owned by Telefónica, S.A. (74.36%) and Telefónica International Wholesale Services, S.L. (25.64%), with its principal place of business at Av. Luis A. de Herrera 1248 4th Floor – (11300) Montevideo, Uruguay (herein called “TIWS América). TIWS América is a holding company and, through its subsidiaries and affiliates, is a full service international telecommunications network owner and service provider in Latin America. TIWS América, through its subsidiaries and affiliates, provides a comprehensive range of international telecommunications services, including voice, data and mobile services.

Telefonica International Wholesale Services América S.A. has obtained FRN #0022340871.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Telefonica International Wholesale Services América S.A.
Av. Luis A. de Herrera 1248 4th Floor – (11300)
Montevideo, Uruguay

(2) Place of Formation

TIWS América is a corporation organized under the laws of Uruguay.

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

Andrés J. Fígoli Pacheco
Secretaría General
Telefonica International Wholesale Services América S.A.
Av. Luis Alberto de Herrera 1248, piso 4
11300 Montevideo, Uruguay
Tel. +598 2 628 00 20. int. 1156
Fax. +598 2 628 20 70

andres.figoli@telefonica.com

with a copy to:

Richard Rubin
Matthew Lewis
Winston & Strawn LLP
1700 K Street, N.W.
Washington, D.C. 200067
Tel: (202) 282-5652
Fax: (202) 282-5100
rrubin@winston.com

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

Information requested by Section 63.18(h):

TIWS América is a privately-held Uruguayan company. TIWS América is 74.36% owned by Telefónica, S.A. and 25.64% owned by Telefónica International Wholesale Services, S.L. ("TIWS S.L.") each being a Spanish corporation having its principal places of business at Distrito C, c/Ronda de la Comunicación s/n, Ed. Oeste-1, 3rd floor, 28050 Madrid, Spain for TIWS SL and Distrito C, c/Ronda de la Comunicación s/n, Edificio Central, 28050 Madrid, Spain for Telefonica, S.A. TIWS S.L. is 92.51% owned by Telefónica, S.A. and 7.49% owned by Telefónica DataCorp., a wholly-owned Spanish corporate subsidiary of Telefónica, S.A.

Interlocking Directorates: José Ramón Vela, a director of Telefónica International Wholesale Services América S.A., is also a director in the following foreign carriers:

Telefónica International Wholesale Services Chile S.A.
Telefónica International Wholesale Services Colombia S.A.
Telefónica International Wholesale Services Ecuador S.A.
Telefónica International Wholesale Services Guatemala, S.A.
Telefónica International Wholesale Services Perú S.A.C.
Telefónica International Wholesale Services, S.L.
Telefónica International Wholesale Services II, S.L.
TIWS France SAS
TIWS Greece Telecommunications Services Company Limited Liability
Telefonica International Wholesale Services Hungary Korlátolt Felelősségű Társaság

Telefonica International Wholesale Services, Latvia Sabiedriba ar ierobezotu atbildibu
 Telefonica International Wholesale Services Sweden AB

Gabriel Rizzo, a director of Telefónica International Wholesale Services América S.A., is
 also a director in the following foreign carriers:

Telefónica International Wholesale Services, S.L.
 Telefónica International Wholesale Services II, S.L.

Information requested by Section 63.18(i):

TIWS América is affiliated with the following foreign carriers:

Destination Country	Foreign Carriers Affiliates
Argentina	Telefónica Mviles Argentina, S.A.
	Telefónica de Argentina, S.A. (*)
	Telefónica International Wholesale Services Argentina S.A.
Austria	Telefónica International Wholesale Services II, S.L. Unipersonal (Austrian Branch)
Belgium	Telefónica International Wholesale Services II, S.L. Unipersonal, Succursale en Belgique
Brazil	Vivo, S.A. (*)
	Telefónica Brasil, S.A. (*)
	Telefónica International Wholesale Services Brasil Ltda.
	Telefónica International Wholesale Services Brasil Participacoes Ltda.
Bulgaria	Telefónica International Wholesale Services II, S.L. Bulgaria Branch
Chile	Telefónica Móviles Chile, S.A.
	Telefónica Chile, S.A.
	Telefónica International Wholesale Services Chile S.A.

Destination Country	Foreign Carriers Affiliates
Colombia	Telefónica Móviles Colombia, S.A.
	Colombia Telecomunicaciones, S.A. ESP (*)
	Telefónica International Wholesale Services Colombia, S.A.
Costa Rica	Telefónica de Costa Rica TC, S.A.
Cyprus	Telefónica International Wholesale Services II, S.L. Unipersonal, branch in Cyprus
Czech Republic	Telefónica Czech Republic, a.s. (*)
Denmark	TIWS, filial af Telefónica International Wholesale Services II, S.L. Unipersonal, Spanien
Ecuador	Otecel, S.A.
	Telefónica International Wholesale Services Ecuador, S.A.
El Salvador	Telefónica Móviles El Salvador, S.A. de C.V.
Estonia	Telefónica International Wholesale Services II, S.L. Unipersonal Eesti filiaal
Finland	Telefónica International Wholesale Services II, S.L. Unipersonal Suomen sivuliike
France	TIWS France SAA
Germany	Telefónica Gennany GmbH & Co. OHG
Greece	TIWS Greece Telecommunications Services Company Limited Liability
Guatemala	Telefónica Móviles Guatemala, S.A.
	Telefónica International Wholesale Services Guatemala, S.A.
Hungary	Telefónica International Wholesale Services Hungary Korlátolt Felelősségű Társaság
Ireland	Telefónica Ireland, Ltd.

Destination Country	Foreign Carriers Affiliates
Italy	Telefónica International Wholesale Services II, S.L. Unipersonal, filiale italiana
Latvia	Telefónica International Wholesale Services, Latvia Sabiedriba ar ierobežotu atbildību
Luxembourg	TIWS succursale Luxembourg de Telefónica International Wholesale Services II, S.L. Unipersonal
Malta	Telefónica International Wholesale Services II, Branch in Malta
Mexico	Telefónica Móviles Mexico, S.A. de C.V.
Netherlands	Telefónica International Wholesale Services II, S.L. Unipersonal, TIWS NETHERLANDS
Nicaragua	Telefónica Celular de Nicaragua, S.A.
Norway	Telefónica International Wholesale Services II, Branch in Norway
Panamá	Telefónica Móviles Panamá, S.A. Telefónica International Wholesale Services Panamá S.A.
Perú	Telefónica Móviles Perú, S.A.C.
	Telefónica del Perú, S.A.A. (*)
	Telefónica International Wholesale Services Perú S.A.C.
Poland	Telefónica International Wholesale Services II, S.L. Unipersonal, (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce
Portugal	Telefónica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal
Romania	Telefónica International Wholesale Services II, Sociedad Limitada Unipersonal, Madrid — Sucursala Bucuresti
Slovakia	Telefónica Slovakia, s.r.o.
	Telefónica International Wholesale Services II, S.L. Unipersonal organizačná zložka

Destination Country	Foreign Carriers Affiliates
Slovenia	Telefónica International Wholesale Services II, S.L. Unipersonal, telekomunikacije, podružnica v Sloveniji
Spain	Telefónica de España S.A.U (*)
	Telefónica Móviles de España S.A.U
	Telefónica International Wholesale Services S.L.
	Telefónica International Wholesale Services II, S.L.
Sweden	Telefónica International Wholesale Services Sweden AB
Switzerland	Telefónica International Wholesale Services II, S.L. Unipersonal, Madrid, Swiss branch, Zurich
UK	Telefónica UK, Ltd.
Uruguay	Telefónica Móviles del Uruguay, S.A.
	Telefónica International Wholesale Services America S.A.
Venezuela	Telefonica Venezolana C.A.

(*) means the carrier is listed on the FCC's *List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*.²⁶

Information requested by Section 63.18(j):

TIWS América does not seek authorization herein to provide international telecommunications services to any PCCS destination country. TIWS América is not a foreign carrier. TIWS América controls the following destination country foreign carriers: **Colombia:** Telefónica International Wholesale Services Colombia, S.A., and **Ecuador:** Telefónica International Wholesale Services Ecuador, S.A. and TIWS América does not control but is

²⁶ See *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).

affiliated with the following PCCS destination country foreign carrier **Panamá**: Telefónica Móviles Panamá, S.A.

Information requested by Section 63.18(k):

Colombia, Ecuador and Panamá are members of the WTO.

Information requested by Section 63.18(o):

TIWS América certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

TIWS América 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

TIWS América hereby certifies that, with respect to the destination countries for the PCCS, it is affiliated with foreign carriers in **Colombia**: Telefónica Móviles Colombia, S.A., Colombia Telecomunicaciones, S.A. ESP, and Telefónica International Wholesale Services Colombia, S.A.; **Ecuador**: Otecel, S.A. and Telefónica International Wholesale Services Ecuador, S.A.; **Panamá**: Telefónica Móviles Panamá, S.A., each of which is a member of the WTO; however, under Sections 1.767(k)(2) and 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. §§ 1.767(k)(2); 63.12(c)(1)(ii), TIWS América qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), because its affiliated foreign carriers lack 50 percent market share in the international transport and the local access markets in


Ecuador and Panamá and in the one market where it is affiliated with a foreign carrier that is presumed to have market power, Colombia, that country is a member of the WTO. TIWS América certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in any of the cable's other destination markets.

CERTIFICATION

I am authorized to enter this certification on behalf of Telefónica International Wholesale Services América S.A.

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

Date: 1/14/2013



Gabriel Rizzo
Attorney at law
Telefónica International Wholesale Services
América S.A.
Av. Luis A. de Herrera 1248, 4th Floor –
11300 Montevideo, Uruguay

Tel: + 598 2 628 00 20

**APPENDIX I — TELEFONICA INTERNATIONAL WHOLESALE
SERVICES USA, INC.**

Telefonica International Wholesale Services USA, Inc. is a Florida state corporation, wholly-owned by TIWS América with address at 1111 Brickell Avenue, suite 1800 Miami, Florida 33131-3122, U.S.A. (herein called “TIWS USA.”) The main business activities of TIWS USA include providing a comprehensive range of international telecommunications services, including voice, data and mobile services. TIWS USA holds a section 214 international telecommunications authorization and a cable landing license for the Sam-1 submarine cable. *See* SCL-LIC-20000204-00003, DA 00-1826, Rel. August 10, 2000; SCL-T/C-20061117-00014; SCL-MOD-20061207-00012 and ITC-214-20080709-00314. Thus, the Commission has previously reviewed and approved TIWS USA’s qualifications to hold Commission authorizations.

Telefonica International Wholesale Services USA, Inc. has obtained FRN #0006650618. Telefonica International Wholesale Services USA, Inc. has been designated “Lead Applicant” for purposes of this Application and, for purposes of efficiency, any communications regarding this Application should be directed to the counsel listed in Section I(3) below.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Telefonica International Wholesale Services USA, Inc.
1111 Brickell Avenue, suite 1800
Miami, Florida 33131-3122, U.S.A.
Tel: (305) 925 5256
Fax: (305) 374 8682

(2) Place of Formation

Florida, U.S.A.

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

Andrés J. Fígoli Pacheco
Secretaría General
Telefonica International Wholesale Services América S.A.
Av. Luis Alberto de Herrera 1248, piso 4
11300 Montevideo, Uruguay
Tel. +598 2 628 00 20. int. 1156
Fax. +598 2 628 20 70
andres.figoli@telefonica.com

with a copy to:

Richard Rubin
Matthew Lewis
Winston & Strawn LLP
1700 K Street, N.W.
Washington, D.C. 200067
Tel: (202) 282-5652
Fax: (202) 282-5100
rrubin@winston.com

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

Information requested by Section 63.18(h):

TIWS USA is a privately-held U.S. company. TIWS USA is wholly-owned by TIWS América, a Uruguayan corporation which is 74.36% owned by Telefónica, S.A. and 25.64% owned by TIWS S.L. Each of Telefónica, S.A. and TIWS S.L. being Spanish corporations having their principal place of business at Distrito C, c/Ronda de la Comunicación s/n, Edificio Central, 28050 Madrid, Spain. TIWS S.L. is 92.51% owned by Telefónica, S.A. and 7.49% owned by Telefónica DataCorp., a wholly-owned Spanish corporate subsidiary of Telefónica, S.A.

Interlocking Directorates: None of the members of TIWS USA's board of directors are also members of the board of directors of any foreign carriers.

Information requested by Section 63.18(i):

TIWS USA is affiliated with the following foreign carriers:

Destination Country	Foreign Carriers Affiliates
Argentina	Telefónica Mviles Argentina, S.A.
	Telefónica de Argentina, S.A. (*)
	Telefónica International Wholesale Services Argentina S.A.
Austria	Telefónica International Wholesale Services II, S.L. Unipersonal (Austrian Branch)
Belgium	Telefónica International Wholesale Services II, S.L. Unipersonal, Succursale en Belgique
Brazil	Vivo, S.A. (*)
	Telefónica Brasil, S.A. (*)
	Telefónica International Wholesale Services Brasil Ltda.
	Telefónica International Wholesale Services Brasil Participacoes Ltda.
Bulgaria	Telefónica International Wholesale Services II, S.L. Bulgaria Branch
Chile	Telefónica Móviles Chile, S.A.
	Telefónica Chile, S.A.
	Telefónica International Wholesale Services Chile S.A.
Colombia	Telefónica Móviles Colombia, S.A.
	Colombia Telecomunicaciones, S.A. ESP (*)
	Telefónica International Wholesale Services Colombia, S.A.
Costa Rica	Telefónica de Costa Rica TC, S.A.
Cyprus	Telefónica International Wholesale Services II, S.L. Unipersonal, branch in Cyprus

Destination Country	Foreign Carriers Affiliates
Czech Republic	Telefónica Czech Republic, a.s. (*)
Denmark	TIWS, filial af Telefónica International Wholesale Services II, S.L. Unipersonal, Spanien
Ecuador	Otecel, S.A.
	Telefónica International Wholesale Services Ecuador, S.A.
El Salvador	Telefónica Móviles El Salvador, S.A. de C.V.
Estonia	Telefónica International Wholesale Services II, S.L. Unipersonal Eesti filiaal
Finland	Telefónica International Wholesale Services II, S.L. Unipersonal Suomen sivuliike
France	TIWS France SAA
Germany	Telefónica Gennany GmbH & Co. OHG
Greece	TIWS Greece Telecommunications Services Company Limited Liability
Guatemala	Telefónica Móviles Guatemala, S.A.
	Telefónica International Wholesale Services Guatemala, S.A.
Hungary	Telefónica International Wholesale Services Hungary Korlátolt Felelősségű Társaság
Ireland	Telefónica Ireland, Ltd.
Italy	Telefónica International Wholesale Services II, S.L. Unipersonal, filiale italiana
Latvia	Telefónica International Wholesale Services, Latvia Sabiedriba ar ierobezotu atbildību
Luxembourg	TIWS succursale Luxembourg de Telefónica International Wholesale Services II, S.L. Unipersonal
Malta	Telefónica International Wholesale Services II, Branch in Malta

Destination Country	Foreign Carriers Affiliates
Mexico	Telefónica Móviles Mexico, S.A. de C.V.
Netherlands	Telefónica International Wholesale Services II, S.L. Unipersonal, TIWS NETHERLANDS
Nicaragua	Telefónica Celular de Nicaragua, S.A.
Norway	Telefónica International Wholesale Services II, Branch in Norway
Panamá	Telefónica Móviles Panamá, S.A.
Perú	Telefónica Móviles Perú, S.A.C.
	Telefónica del Perú, S.A.A. (*)
	Telefónica International Wholesale Services Perú S.A.C.
Poland	Telefónica International Wholesale Services II, S.L. Unipersonal, (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce
Portugal	Telefónica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal
Romania	Telefónica International Wholesale Services II, Sociedad Limitada Unipersonal, Madrid — Sucursala Bucaresti
Slovakia	Telefónica Slovakia, s.r.o.
	Telefónica International Wholesale Services II, S.L. Unipersonal organizačná zložka
Slovenia	Telefónica International Wholesale Services II, S.L. Unipersonal, telekomunikacije, podružnica v Sloveniji
Spain	Telefónica de España S.A.U (*)
	Telefónica Móviles de España S.A.U
	Telefónica International Wholesale Services S.L.
	Telefónica International Wholesale Services II, S.L.
Sweden	Telefónica International Wholesale Services Sweden AB

Destination Country	Foreign Carriers Affiliates
Switzerland	Telefónica International Wholesale Services II, S.L. Unipersonal, Madrid, Swiss branch, Zurich
UK	Telefónica UK, Ltd.
Uruguay	Telefónica Móviles del Uruguay, S.A.
	Telefónica International Wholesale Services America S.A.
Venezuela	Telefonica Venezolana C.A.

(*) means the carrier is listed on the FCC's *List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*.²⁷

Information requested by Section 63.18(j):

TIWS USA does not seek authorization herein to provide international telecommunications services to any PCCS destination country. TIWS USA is not a foreign carrier. TIWS USA does not control any destination (PCCS landing station) country foreign carriers but is affiliated with foreign carriers in three (3) destination (PCCS landing station) countries -- Colombia, Panamá and Ecuador.

Information requested by Section 63.18(k):

TIWS USA does not control any destination country foreign carriers but is affiliated with foreign carriers in three (3) destination (PCCS landing station) countries -- Colombia, Panamá and Ecuador, all of which are members of the WTO.

²⁷ See *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).

Information requested by Section 63.18(o):

TIWS USA certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

TIWS USA 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

TIWS USA hereby certifies that, with respect to the destination countries for the PCCS, it is affiliated with foreign carriers in **Colombia**: Telefónica Móviles Colombia, S.A., Colombia Telecomunicaciones, S.A. ESP, and Telefónica International Wholesale Services Colombia, S.A.; **Ecuador**: Otecel, S.A. and Telefónica International Wholesale Services Ecuador, S.A.; **Panamá**: Telefónica Móviles Panamá, S.A., each of which is a member of the WTO; however, under Sections 1.767(k)(2) and 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. §§ 1.767(k)(2); 63.12(c)(1)(ii), TIWS USA qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), because its affiliated foreign carriers lack 50 percent market share in the international transport and the local access markets in Ecuador and Panamá and in the one market where it is affiliated with a foreign carrier that is presumed to have market power, Colombia, that country is a member of the WTO. TIWS USA certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in any of the cable's other

PCCS destination markets and that it agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(1).

CERTIFICATION

I am authorized to enter this certification on behalf of Telefonica International Wholesale Services USA, Inc.

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



Eduardo Saravia
President
Telefonica International Wholesale Services USA, Inc.
1111 Brickell Avenue, suite 1800
Miami, Florida 33131-3122, U.S.A.
Tel: (305) 925 5256

Date: 1.14.2013

APPENDIX J — TI WHOLESALE SERVICES PUERTO RICO, INC.

TI Wholesale Services Puerto Rico, Inc. is a Puerto Rico corporation, wholly-owned by TIWS América with main address at 1111 Brickell Avenue, suite 1800, Miami, Florida 33131-3122 (herein called “TIWS PR.” The main business activities of TIWS PR are providing a comprehensive range of international telecommunications services, including voice, data and mobile services. TIWS Puerto Rico holds a cable landing license for the SAM-1 submarine cable. *See* SCL-LIC-20000204-00003, DA 00-1826, Rel. August 10, 2000; SCL-T/C-20061117-00014; and SCL-MOD-20061207-00012. Thus, the Commission has previously reviewed and approved TIWS PR’s qualifications to hold a Commission authorization.

TI Wholesale Services Puerto Rico, Inc. has obtained FRN #0022340921.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

TI International Wholesale Services Puerto Rico, Inc.
1111 Brickell Avenue, suite 1800
Miami, Florida 33131-3122, U.S.A.
Tel: (305) 925 5256
Fax: (305) 374 8682

(2) Place of Formation

Puerto Rico, U.S.A.

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

Andrés J. Fígoli Pacheco
Secretaría General
Telefonica International Wholesale Services América S.A.
Av. Luis Alberto de Herrera 1248, piso 4
11300 Montevideo, Uruguay
Tel. +598 2 628 00 20. int. 1156
Fax. +598 2 628 20 70
andres.figoli@telefonica.com

(8) Certification and Ownership Information Requested by Sections 63.18(h)-(k) and (o) of the Commission’s Rules

Information requested by Section 63.18(h):

TIWS Puerto Rico is a privately-held U.S. company. TIWS Puerto Rico is wholly-owned by TIWS América, a Uruguayan corporation which is 74.36% owned by Telefónica, S.A. and 25.64% owned by TIWS S.L. Each of Telefónica, S.A. and TIWS S.L. being Spanish corporations having their principal place of business at Distrito C, c/Ronda de la Comunicación s/n, Edificio Central, 28050 Madrid, Spain. TIWS S.L. is 92.51% owned by Telefónica, S.A. and 7.49% owned by Telefónica DataCorp., a wholly-owned Spanish corporate subsidiary of Telefónica, S.A.

Interlocking Directorates: None of the members of TIWS PR’s board of directors are also members of the board of directors of any foreign carriers.

Information requested by Section 63.18(i):

TIWS PR is affiliated with the following foreign carriers:

Destination Country	Foreign Carriers Affiliates
Argentina	Telefónica Mviles Argentina, S.A.
	Telefónica de Argentina, S.A. (*)
	Telefónica International Wholesale Services Argentina S.A.
Austria	Telefónica International Wholesale Services II, S.L. Unipersonal (Austrian Branch)
Belgium	Telefónica International Wholesale Services II, S.L. Unipersonal, Succursale en Belgique
Brazil	Vivo, S.A. (*)

Destination Country	Foreign Carriers Affiliates
	Telefónica Brasil, S.A. (*)
	Telefónica International Wholesale Services Brasil Ltda.
	Telefónica International Wholesale Services Brasil Participacoes Ltda.
Bulgaria	Telefónica International Wholesale Services II, S.L. Bulgaria Branch
Chile	Telefónica Móviles Chile, S.A.
	Telefónica Chile, S.A.
	Telefónica International Wholesale Services Chile S.A.
Colombia	Telefónica Móviles Colombia, S.A.
	Colombia Telecomunicaciones, S.A. ESP (*)
	Telefónica International Wholesale Services Colombia, S.A.
Costa Rica	Telefónica de Costa Rica TC, S.A.
Cyprus	Telefónica International Wholesale Services II, S.L. Unipersonal, branch in Cyprus
Czech Republic	Telefónica Czech Republic, a.s. (*)
Denmark	TIWS, filial af Telefónica International Wholesale Services II, S.L. Unipersonal, Spanien
Ecuador	Otecel, S.A.
	Telefónica International Wholesale Services Ecuador, S.A.
El Salvador	Telefónica Móviles El Salvador, S.A. de C.V.
Estonia	Telefónica International Wholesale Services II, S.L. Unipersonal Eesti filiaal
Finland	Telefónica International Wholesale Services II, S.L. Unipersonal Suomen sivuliike
France	TIWS France SAA

Destination Country	Foreign Carriers Affiliates
Germany	Telefónica Gennany GmbH & Co. OHG
Greece	TIWS Greece Telecommunications Services Company Limited Liability
Guatemala	Telefónica Móviles Guatemala, S.A.
	Telefónica International Wholesale Services Guatemala, S.A.
Hungary	Telefónica International Wholesale Services Hungary Korlátolt Felelősségű Társaság
Ireland	Telefónica Ireland, Ltd.
Italy	Telefónica International Wholesale Services II, S.L. Unipersonal, filiale italiana
Latvia	Telefónica International Wholesale Services, Latvia Sabiedriba ar ierobezotu atbildību
Luxembourg	TIWS succursale Luxembourg de Telefónica International Wholesale Services II, S.L. Unipersonal
Malta	Telefónica International Wholesale Services II, Branch in Malta
Mexico	Telefónica Moviles Mexico, S.A. de C.V.
Netherlands	Telefónica International Wholesale Services II, S.L. Unipersonal, TIWS NETHERLANDS
Nicaragua	Telefónica Celular de Nicaragua, S.A.
Norway	Telefónica International Wholesale Services II, Branch in Norway
Panamá	Telefónica Móviles Panamá, S.A.
Perú	Telefónica Móviles Perú, S.A.C.
	Telefónica del Perú, S.A.A. (*)
	Telefónica International Wholesale Services Perú S.A.C.
Poland	Telefónica International Wholesale Services II, S.L. Unipersonal, (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce

Destination Country	Foreign Carriers Affiliates
Portugal	Telefónica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal
Romania	Telefónica International Wholesale Services II, Sociedad Limitada Unipersonal, Madrid — Sucursala Bucaresti
Slovakia	Telefónica Slovakia, s.r.o.
	Telefónica International Wholesale Services II, S.L. Unipersonal organizačná zložka
Slovenia	Telefónica International Wholesale Services II, S.L. Unipersonal, telekomunikacije, podružnica v Sloveniji
Spain	Telefónica de España S.A.U (*)
	Telefónica Móviles de España S.A.U
	Telefónica International Wholesale Services S.L.
	Telefónica International Wholesale Services II, S.L.
Sweden	Telefónica International Wholesale Services Sweden AB
Switzerland	Telefónica International Wholesale Services II, S.L. Unipersonal, Madrid, Swiss branch, Zurich
UK	Telefónica UK, Ltd.
Uruguay	Telefónica Móviles del Uruguay, S.A.
	Telefónica International Wholesale Services America S.A.
Venezuela	Telefonica Venezolana C.A.

(*) means the carrier is listed on the FCC's *List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*²⁸

²⁸ See *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).

Information requested by Section 63.18(j):

TIWS Puerto Rico does not seek authorization herein to provide international telecommunications services to any PCCS destination country. TIWS Puerto Rico is not a foreign carrier. TIWS Puerto Rico does not control any destination country foreign carriers but is affiliated with foreign carriers in three (3) destination (PCCS landing station) countries -- Colombia, Panamá and Ecuador.

Information requested by Section 63.18(k):

TIWS Puerto Rico does not control any destination (PCCS landing station) country foreign carriers but is affiliated with foreign carriers in three (3) destination (PCCS landing station) countries -- Colombia, Panamá and Ecuador, all of which are members of the WTO.

Information requested by Section 63.18(o):

TIWS Puerto Rico certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

TIWS Puerto Rico 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

TIWS PR hereby certifies that, with respect to the destination countries for the PCCS, it is affiliated with foreign carriers in **Colombia**: Telefónica Móviles Colombia, S.A., Colombia Telecomunicaciones, S.A. ESP, and Telefónica International Wholesale Services Colombia,

S.A.; **Ecuador:** Otecel, S.A. and Telefónica International Wholesale Services Ecuador, S.A.; **Panamá:** Telefónica Móviles Panamá, S.A., each of which is a member of the WTO; however, under Sections 1.767(k)(2) and 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. §§ 1.767(k)(2); 63.12(c)(1)(ii), TIWS PR qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), because its affiliated foreign carriers lack 50 percent market share in the international transport and the local access markets in Ecuador and Panamá and in the one market where it is affiliated with a foreign carrier that is presumed to have market power, Colombia, that country is a member of the WTO. TIWS PR certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in any of the other PCCS destination markets and that it agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(1).

CERTIFICATION

I am authorized to enter this certification on behalf of TI Wholesale Services Puerto Rico,
Inc.

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

Date: 1/14/2013



Eduardo Saravia
President
TI Wholesale Services Puerto Rico, Inc.
1111 Brickell Avenue, suite 1800
Miami, Florida 33131-3122, U.S.A.
Tel: (305) 925 5256

**APPENDIX K — TELEFONICA INTERNATIONAL WHOLESALE SERVICES
COLOMBIA S.A.**

Telefonica International Wholesale Services Colombia S.A. is a Colombian corporation, 94.98% owned by TIWS América, 1.67% owned by TIWS Chile S.A., 1.67% owned by TIWS Peru S.A.C., 1.66% owned by TIWS Guatemala S.A. and 0.01% owned by TIWS Argentina S.A., with address at Tranversal 60 (Av. Suba) No. 114 A – 55 Cubo Sur, Bogotá D.C. – Colombia. (herein called “TIWS Colombia”). The main business activities of TIWS Colombia are providing a comprehensive range of international telecommunications services, including voice, data and mobile services.

Telefonica International Wholesale Services Colombia S.A. has obtained FRN #0022340954.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Telefonica International Wholesale Services Colombia S.A.
Tranversal 60 (Av. Suba) No. 114 A – 55 Cubo Sur,
Bogotá D.C. – Colombia
Tel: + 57 1 70 51 741

(2) Place of Formation

Colombia.

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

Andrés J. Fígoli Pacheco
Secretaría General
Telefonica International Wholesale Services América S.A.
Av. Luis Alberto de Herrera 1248, piso 4
11300 Montevideo, Uruguay
Tel. +598 2 628 00 20. int. 1156
Fax. +598 2 628 20 70
andres.figoli@telefonica.com

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

Information requested by Section 63.18(h):

TIWS Colombia is a privately-held Colombian company. TIWS Colombia is 94.98% owned by TIWS América, 1.67% owned by TIWS Chile S.A., 1.67% owned by TIWS Peru S.A.C., 1.66% owned by TIWS Guatemala S.A. and 0.01% owned by TIWS Argentina S.A. TIWS América is a Uruguayan corporation which is 74.36% owned by Telefónica, S.A. and 25.64% owned by TIWS S.L. Each of Telefónica, S.A. and TIWS S.L. being Spanish corporations having their principal place of business at Distrito C, c/Ronda de la Comunicación s/n, Edificio Central, 28050 Madrid, Spain. TIWS S.L. is 92.51% owned by Telefónica, S.A. and 7.49% owned by Telefónica DataCorp., a wholly-owned Spanish corporate subsidiary of Telefónica, S.A.

Interlocking Directorates: José Ramón Vela, a director of Telefónica International Wholesale Services Colombia S.A., is also a director in the following foreign carriers:

Telefónica International Wholesale Services América S.A.
Telefónica International Wholesale Services Chile S.A.
Telefónica International Wholesale Services Ecuador S.A.
Telefónica International Wholesale Services Guatemala, S.A.
Telefónica International Wholesale Services Perú S.A.C.
Telefónica International Wholesale Services, S.L.
Telefónica International Wholesale Services II, S.L.
TIWS France SAS
TIWS Greece Telecommunications Services Company Limited Liability
Telefonica International Wholesale Services Hungary Korlátolt Felelősségű Társaság
Telefonica International Wholesale Services, Latvia Sabiedriba ar ierobezotu atbildību
Telefonica International Wholesale Services Sweden AB

Luis Palomo, a director of Telefónica International Wholesale Services Colombia S.A., is also a director in the following foreign carriers:

Telefónica International Wholesale Services Chile S.A.

Telefónica International Wholesale Services Ecuador S.A.

Juan Carlos Bernal, a director of Telefónica International Wholesale Services Colombia S.A., is also a director in the following foreign carriers:

Telefónica International Wholesale Services Chile S.A.
Telefónica International Wholesale Services Ecuador S.A

Information requested by Section 63.18(i):

TIWS Colombia is affiliated with the following foreign carriers:

Destination Country	Foreign Carriers Affiliates
Argentina	Telefónica Mviles Argentina, S.A.
	Telefónica de Argentina, S.A. (*)
	Telefónica International Wholesale Services Argentina S.A.
Austria	Telefónica International Wholesale Services II, S.L. Unipersonal (Austrian Branch)
Belgium	Telefónica International Wholesale Services II, S.L. Unipersonal, Succursale en Belgique
Brazil	Vivo, S.A. (*)
	Telefónica Brasil, S.A. (*)
	Telefónica International Wholesale Services Brasil Ltda.
	Telefónica International Wholesale Services Brasil Participacoes Ltda.
Bulgaria	Telefónica International Wholesale Services II, S.L. Bulgaria Branch
Chile	Telefónica Móviles Chile, S.A.
	Telefónica Chile, S.A.
	Telefónica International Wholesale Services Chile S.A.

Destination Country	Foreign Carriers Affiliates
Colombia	Telefónica Móviles Colombia, S.A.
	Colombia Telecomunicaciones, S.A. ESP (*)
Costa Rica	Telefónica de Costa Rica TC, S.A.
Cyprus	Telefónica International Wholesale Services II, S.L. Unipersonal, branch in Cyprus
Czech Republic	Telefónica Czech Republic, a.s. (*)
Denmark	TIWS, filial af Telefónica International Wholesale Services II, S.L. Unipersonal, Spanien
Ecuador	Otecel, S.A.
	Telefónica International Wholesale Services Ecuador, S.A.
El Salvador	Telefónica Móviles El Salvador, S.A. de C.V.
Estonia	Telefónica International Wholesale Services II, S.L. Unipersonal Eesti filiaal
Finland	Telefónica International Wholesale Services II, S.L. Unipersonal Suomen sivuliike
France	TIWS France SAA
Germany	Telefónica Gennany GmbH & Co. OHG
Greece	TIWS Greece Telecommunications Services Company Limited Liability
Guatemala	Telefónica Móviles Guatemala, S.A.
	Telefónica International Wholesale Services Guatemala, S.A.
Hungary	Telefónica International Wholesale Services Hungary Korlátolt Felelősségű Társaság
Ireland	Telefónica Ireland, Ltd.
Italy	Telefónica International Wholesale Services II, S.L. Unipersonal, filiale italiana

Destination Country	Foreign Carriers Affiliates
Latvia	Telefónica International Wholesale Services, Latvia Sabiedriba ar ierobezotu atbildību
Luxembourg	TIWS succursale Luxembourg de Telefónica International Wholesale Services II, S.L. Unipersonal
Malta	Telefónica International Wholesale Services II, Branch in Malta
Mexico	Telefónica Mviles Mexico, S.A. de C.V.
Netherlands	Telefónica International Wholesale Services II, S.L. Unipersonal, TIWS NETHERLANDS
Nicaragua	Telefónica Celular de Nicaragua, S.A.
Norway	Telefónica International Wholesale Services II, Branch in Norway
Panamá	Telefónica Móviles Panamá, S.A.
Perú	Telefónica Móviles Perú, S.A.C.
	Telefónica del Perú, S.A.A. (*)
	Telefónica International Wholesale Services Perú S.A.C.
Poland	Telefónica International Wholesale Services II, S.L. Unipersonal, (Spółka z ograniczoną odpowiedzialnością) Oddział w Polsce
Portugal	Telefónica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal
Romania	Telefónica International Wholesale Services II, Sociedad Limitada Unipersonal, Madrid — Sucursala Bucuresti
Slovakia	Telefónica Slovakia, s.r.o.
	Telefónica International Wholesale Services II, S.L. Unipersonal organizačná zložka
Slovenia	Telefónica International Wholesale Services II, S.L. Unipersonal, telekomunikacije, podružnica v Sloveniji
Spain	Telefónica de España S.A.U (*)

Destination Country	Foreign Carriers Affiliates
	Telefónica Móviles de España S.A.U
	Telefónica International Wholesale Services S.L.
	Telefónica International Wholesale Services II, S.L.
Sweden	Telefónica International Wholesale Services Sweden AB
Switzerland	Telefónica International Wholesale Services II, S.L. Unipersonal, Madrid, Swiss branch, Zurich
UK	Telefónica UK, Ltd.
Uruguay	Telefónica Móviles del Uruguay, S.A.
	Telefónica International Wholesale Services America S.A.
Venezuela	Telefonica Venezolana C.A.

(*) means the carrier is listed on the FCC's *List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*.²⁹

Information requested by Section 63.18(j):

TIWS Colombia does not seek authorization herein to provide international telecommunications services to any PCCS destination country. TIWS Colombia is a non-dominant foreign carrier in Colombia. TIWS Colombia does not control any destination country foreign carriers.

Information requested by Section 63.18(k):

TIWS Colombia does not control any destination country foreign carriers.

²⁹ See *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).

Information requested by Section 63.18(o):

TIWS Colombia certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

TIWS Colombia 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)

TIWS Colombia hereby certifies that, with respect to the destination countries for the PCCS, it is affiliated with foreign carriers in **Colombia**: Telefónica Móviles Colombia, S.A., and Colombia Telecomunicaciones, S.A. ESP; **Ecuador**: Otecel, S.A. and Telefónica International Wholesale Services Ecuador, S.A.; **Panamá**: Telefónica Móviles Panamá, S.A., each of which is a member of the WTO; however, under Sections 1.767(k)(2) and 63.12(c)(1)(ii) of the Commission's Rules, 47 C.F.R. §§ 1.767(k)(2); 63.12(c)(1)(ii), TIWS Colombia qualifies for a presumption of non-dominance under Section 63.10(a)(3), 47 C.F.R. § 63.10(a)(3), because its affiliated foreign carriers lack 50 percent market share in the international transport and the local access markets in Ecuador and Panamá and in the one market where it is affiliated with a foreign carrier that is presumed to have market power, Colombia, that country is a member of the WTO. TIWS Colombia certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in any of the other PCCS destination markets and that it agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(1).

Telefonica

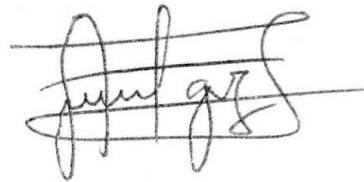
Telefónica International Wholesale Services Colombia S.A.
Transv. 60 No. 114A-55, Cubo Sur, Piso 3
Bogotá, Colombia
Tel. (57-1) 7051730
Fax. (57-1) 7051746

CERTIFICATION

I am authorized to enter this certification on behalf of Telefónica International Wholesale Services Colombia S.A.

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

Date: January 14, 2013



Arbey Gomez
Legal Representative
Telefonica International Wholesale Services
Colombia S.A.
Tranversal 60 (Av. Suba) No. 114 A – 55
Cubo Sur, Bogotá D.C. – Colombia
Tel: + 57 1 70 51 741

APPENDIX L — ANTELECOM N.V.

Antelecom N.V. is a direct, wholly-owned subsidiary of United Telecommunication Services N.V., which is a Curacao government owned company. United Telecommunication Services N.V. is a Limited Liability Corporation organized and existing under the laws of the Netherlands Antilles and having its head office at Rigelweg 2, Curaçao. Antelecom N.V. provides long distance and international telecommunication services, wholesale and retail, directly to the public and to other carriers and/or operators through the use of wireline, wireless and satellite technologies, including VOIP. These services are mostly provided through its parent company, United Telecommunication Services N.V.

Antelecom N.V. has obtained FRN #0022345144.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(A)

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

Antelecom N.V.
Rigelweg 2
Willemstad, Curacao
Tel: + 5999 7770101

(2) Place of Formation

Curacao

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

Mr R. Martes
Executive Officer
Antelecom N.V.
Rigelweg 2
Willemstad, Curacao
Tel: +5999 7771282

With copies to:

United Telecommunication Services N.V.
Legal Department
Rigelweg 2
Willemstad
Curacao
Tel: + 5999 7770101

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

Information requested by Section 63.18(h):

Antelecom N.V., Rigelweg 2, Willemstad, Curaçao, is a wholly-owned subsidiary company of United Telecommunication Services N.V., which is a Curacao government-owned company. United Telecommunication Services N.V. is a Limited Liability Corporation organized and existing under the laws of the Netherlands Antilles and also having its head office at Rigelweg 2, Willemstad, Curaçao.

Interlocking Directorates: The following members of Antelecom's board of directors, Mr. P.T. de Geus and Mr. G. Carty, are also members of the board of directors of the following foreign carriers: Setel N.V. (Curacao); Radcomm Corporation N.V. (Saint Maarten); United Telecommunication Services French West Indies S.A.R.L. (Saint Maarten); International Telecommunication Suriname N.V. (Suriname); and United Telecommunication Services (St. Kitts and Nevis) Limited (St.Kitts and Nevis) a 60% shareholder in operating company United Telecommunication Services Cariglobe Limited (St. Kitts and Nevis)

Information requested by Section 63.18(i):

Antelecom is a foreign carrier and is not affiliated with any following foreign carriers except as may be reflected through interlocking directorates identified in response to Section 63.18(h) above.

Information requested by Section 63.18(j):

Antelecom is not affiliated with any foreign carrier in any destination (PCCS landing station) country. Also, Antelecom does not hold any authorizations issued by the Commission.

Information requested by Section 63.18(k):

Antelecom is not affiliated with any foreign carrier in any destination (PCCS landing station) country.

Information requested by Section 63.18(o):

Antelecom certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

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

Antelecom 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).

II. ELIGIBILITY FOR STREAMLINED PROCESSING — 47 C.F.R. § 1.767(K)


Antelecom certifies that it is a foreign carrier and is not affiliated with a foreign carrier in any of the cable's landing station markets.

CERTIFICATION

I am authorized to enter this certification on behalf of Antelcom N.V.

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

Date: *Jan 15, 2013*

By 



P.T. de Geus
Chief Executive Officer
Antelecom N.V.
Rigelweg 2
Willemstad, Curacao
Tel: + 5999 7770101

APPENDIX M – LANDING STATION INFORMATION

- **TAB 1: Jacksonville, Florida Landing Station**
- **TAB 2: Tortola, British Virgin Islands Landing Station**
- **TAB 3: San Juan, Puerto Rico Landing Station**
- **TAB 4: Hudishibana, Aruba Landing Station**
- **TAB 5: Cartagena, Colombia Landing Station**
- **TAB 6: Maria Chiquita, Panama Landing Station**
- **TAB 7: Balboa, Panama Landing Station**
- **TAB 8: Manta, Ecuador Landing Station**

APPENDIX M- LANDING STATION INFORMATION




- **TAB 1: Jacksonville, Florida Landing Station**

Jacksonville Florida Landing Specifics, Owned by TIWS-USA, Inc.			
		GPS Coordinates	Street Address
Beach Manhole		30° 17.818' N, 081° 23.432' W	Beach, 8 th Avenue North, Jacksonville Beach, FL USA
Cable Station		30° 17' 09" N 081° 23' 35" W	No Number, South 2 nd Ave, Jacksonville Beach, FL USA 32250. (between 4 th and 5 th Street South)



APPENDIX M- LANDING STATION INFORMATION



▪ **TAB 2: Tortola, British Virgin Islands Landing Station**

Tortola, British Virgin Islands Landing Specifics, Owned by Cable & Wireless (BVI) Limited			
		GPS Coordinates	Street Address
Beach Manhole-Segments 1 & 2A (to Jacksonville & Panama)		18° 26.3750'N 064° 38.9240'W	Brewers Bay
Beach Manhole-Segment 2 (to Panama)		18° 24.212' N 064° 37.997' W	Nanny Cay Bay
Cable Station		18° 24.039" N 64° 38.325" W	LIME BVI Palestina Technical Engineering Center (TEC) Palestina, Tortola British Virgin Islands



APPENDIX M- LANDING STATION INFORMATION



- **TAB 3: San Juan, Puerto Rico Landing Station**

San Juan, Puerto Landing Specifics, Owned by TIWS Puerto Rico, Inc.			
		GPS Coordinates	Street Address
Beach Manhole		18° 26.6080' N 066°01.2770' W	Tartak Street
Cable Station		18° 27' 05" N 066° 02' 28" W	2423 Calle Loiza, San Juan, PR 00913



APPENDIX M- LANDING STATION INFORMATION



- **TAB 4: Hudishibana, Aruba Landing Station**

Hudishibana, Aruba Landing Specifics, Owned by SETAR			
		GPS Coordinates	Street Address
Beach Manhole		12° 36.9540' N 070° 02.7160' W	Hudishibana Beach
Cable Station		12°36'44.34"N 70° 2'56.32"W	L.G. Smith Boulevard Hudishibana



APPENDIX M- LANDING STATION INFORMATION



▪ **TAB 5: Cartagena, Colombia Landing Station**

Cartagena, Colombia Landing Specifics, Owned by TIWS-Colombia S.A.			
		GPS Coordinates	Street Address
Beach Manhole		10° 26.2250' N 075° 32.0770' W	Carrera 1 # 48-1 a 48-99, Cartagena De Indias (Distrito Turístico Y Cultural), Bolívar, Colombia
Cable Station		10° 25' 53.35" N 75° 31' 56.27" W	Carrera 17 No. 47 – 03, Paseo de Bolívar, Cartagena de Indias, Colombia



APPENDIX M- LANDING STATION INFORMATION



- **TAB 6: Maria Chiquita, Panama Landing Station**

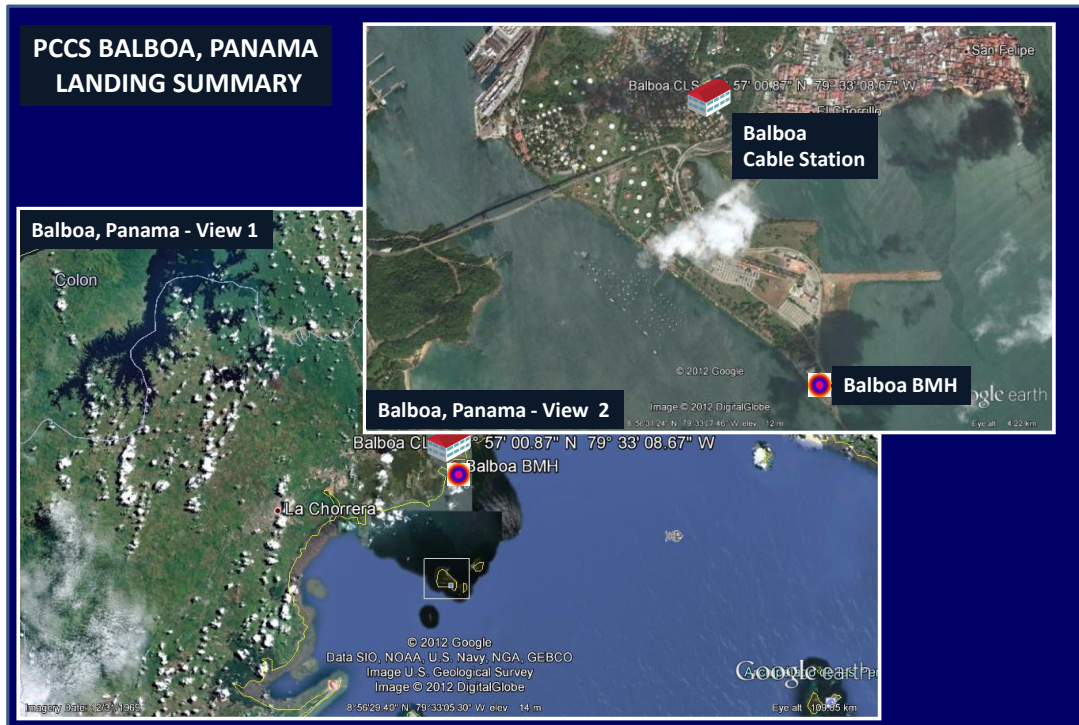
Maria Chiquita, Panama Landing Specifics, Owned by Cable & Wireless Panama S.A.			
		GPS Coordinates	Street Address
Beach Manhole		09° 26.5768' N 079° 45.4238' W	Maria Chiquita Main Street, Portobelo county, Colon, Panama
Cable Station		9° 26' 7.26" N 79° 45' 12.20" W	Road to Portobelo, Portobelo County, Colon, Panama



APPENDIX M- LANDING STATION INFORMATION



- **TAB 7: Balboa, Panama Landing Station**

Balboa, Panama Landing Specifics, Owned by Cable & Wireless Panama S.A.			
		GPS Coordinates	Street Address
Beach Manhole		08° 56.0080' N 079° 32.6980' W	Av Amador, Ciudad de Panama, Panama
Cable Station		8° 57' 00.87" N 79° 33' 08.67" W	Gavilán Street No.0843, Ancón County, Panama, Panama



APPENDIX M- LANDING STATION INFORMATION

▪ **TAB 8: Manta, Ecuador Landing Station**

Manta, Ecuador Landing Specifics, Owned by Cable Andino			
		GPS Coordinates	Street Address
Beach Manhole		00° 56.3840' S 080° 43.7400' W	MURCIELAGO BEACH
Cable Station		0°57'10.58"S 80°45'10.77"W	VIA BARBASQUILLO



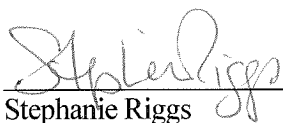
CERTIFICATE OF SERVICE

I, Stephanie Riggs, do hereby certify that on January 16, 2013, I served a copy of the above Application for a license to construct, land, and operate a fiber-optic submarine cable system linking the continental United States and the British Virgin Islands, Puerto Rico, Aruba, Colombia, Panama, and Ecuador upon the following parties by U.S. first-class mail, postage prepaid:

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

Kathy Smith
Office of Chief Counsel/NTIA
U.S. Department of Commerce
14th Street and Constitution Ave., N.W.
Washington, D.C. 20230

Defense Information Systems Agency
ATTN: GC/DOI
6910 Cooper Avenue
Fort Meade, MD 20755-7088


Stephanie Riggs