

**Before 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 (SETAR) N.V.)
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-20130122-00001
an Undersea Cable System Linking the British)
Virgin Islands, Puerto Rico, Aruba, Colombia,)
Panama, Ecuador and the continental United States)
)
Pacific Caribbean Cable System)

**SUPPLEMENT TO
JOINT APPLICATION FOR SUBMARINE CABLE LANDING LICENSE**

Cable and Wireless (BVI) Limited (“Cable & Wireless BVI”), Cable and Wireless (EWC) Limited (“Cable & Wireless EWC”), Cable & Wireless Panama S.A. (“Cable & Wireless Panama”), Servicio di Telecomunicacion di Aruba (SETAR) 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”), 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 “Applicants”), through its undersigned attorneys, hereby submit this supplement (the “Supplement”) to FCC application File No. SCL-LIC-20130122-00001 (the “Application”) for the purposes of:

- (1) Supplementing the showing contained in the Application regarding the Effective Competitive Opportunities (“ECO”) test as it has been applied in the context of submarine cable landing license applications and, particularly, with respect to the country of Aruba. In support of its ECO test showing, Applicants have attached hereto as Exhibit 1 a certification from Mr. Z. Roland Croes, Director of Applicant SETAR and as Exhibit 2 a letter from Mr. J. L. Jansen, Director of the Regulatory Department of Aruba, Directie Telecommunicatie Zaken (“DTZ”).
- (2) Providing revised appendices containing updated information for the particular Applicants. The amended appendices are attached hereto as Exhibit 3 and are intended to replace Appendices A-L of the Application. Appendix M remains as initially filed.

I. Supplemental ECO Test Showing

In 2011, the Commission determined that Aruba satisfied the ECO test as it is articulated for Section 214 authorization applications.¹ The ECO test for submarine cable landing licenses is not codified but involves a Commission examination of whether there are any restrictions on:

- (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

¹ See *TA Resources N.V., Application for International Section 214 Authorization and Determination that Aruba provides Effective Competitive Opportunities to U.S. Carriers*, IB Docket No. 10-228, Order and Authorization, 26 FCC Rcd 15978 (Int’l Bur. 2011) (“*TA Resources Order*”).

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].²

The Applicants submit that the best evidence that there are no such impediments in the case of Aruba is that of the two submarine cables that currently land in Aruba, one has significant ownership by U.S.-licensed companies. Specifically, multiple U.S.-licensed carriers hold interests in the Pan-American cable system (“PAN-AM Cable”) which lands in, among other points, Baby Beach, Aruba and in St. Croix, U.S. Virgin Islands and which has been previously licensed by the Commission (SCL-LIC-19970421-00002) and the subject of multiple modification applications before the FCC since that time. The following U.S.-licensed carriers are among the owners of the PAN-AM Cable: AT&T Corp., MCI International, Sprint Communications Company L.P., and Primus Telecommunications, Inc.³ Thus, the main submarine cable that currently lands in Aruba has significant direct ownership by U.S.-licensed companies.⁴ The Applicants are not aware of any legal or practical impediments that existed or exist in Aruba to the landing of the PAN-AM Cable or any other submarine cable, access to a

² *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market*, IB Docket No. 12-299 at ¶9, Notice of Proposed Rulemaking, rel. October 11, 2012 (“*Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market Notice*”); *see also 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). The original ECO test came from *Market Entry and Regulation of Foreign-Affiliated Entities*, 11 FCC Rcd 3873 (1995) (IB Docket No. 95-22). That order spoke in terms of a U.S. carrier “having the legal right to obtain a controlling interest in a facilities-based carrier.” ¶47. However, the order expressly acknowledges that this does not require a showing that the US carrier be actually providing services, “only that it not be legally prohibited from doing so.” Thus, the order recognizes that such evidence can exist through the lack of a legal prohibition. Also, the 1997 order that eliminated the ECO test for WTO members (12 FCC Rcd 23891, IB Dkt. 97-142) characterized the test as requiring a demonstration “that there be no legal or practical restrictions on US carriers’ entry into the foreign carrier’s market.” Again, from inception, the FCC is recognizing that the ECO test will be satisfied by a showing of a lack of restrictions.

³ *See Certification of Z. Roland Croes, Director of PCCS Applicant SETAR* (attached hereto as Exhibit 1 and referred to herein as “SETAR Certification”) at ¶4; *see also Letter from Mr. J. L. Jansen, Director of DTZ* (attached hereto as Exhibit 2 and referred to herein as “DTZ Letter”) (stating that “DTZ has issued several [international telecommunications] licenses, including to entities owned by foreign investors”).

⁴ The other submarine cable landing in Aruba, the Alonso de Ojeda, connects Aruba with Curacao.

landing station, collocation within the station or connection to backhaul or other telecommunications services providers.⁵ Moreover, the Applicants are not aware of any law or regulation in Aruba that has even considered the foreign (including U.S.-licensed) status of the owners of the PAN-AM Cable or any other submarine cable.⁶

In addition to the foregoing, the effective competitive opportunities for a U.S.-licensed company to land and operate a submarine cable in Aruba are evidenced by the attached certification from the Director of SETAR and letter from the Director of DTZ.⁷ As stated in the SETAR Certification, there are no known impediments to the legal ability of U.S.-licensed companies, or foreign carriers generally, to enter the Aruban market to provide international telecommunications services, including having an ownership interests in submarine cables that land in Aruba, so long as they do so through a subsidiary organized under the laws of Aruba. In fact, several foreign providers have obtained international telecommunications service licenses from the Aruban telecommunications regulator, the Directie Telecommunicatie Zaken (“DTZ”) and are operating in Aruba, including (i) MIO Group, Ltd., which is majority-owned by U.S. private equity firm Cartesian Capital Group, LLC; (ii) Digicel, which is owned by an Irish citizen; and (iii) Scarlet, a wholly-owned subsidiary of Belgium’s national carrier Belgacom.⁸

Also, the process for SETAR to receive authorization to land the PCCS in Aruba and operate the landing station is the same as that a U.S.-licensed company would be required to follow. To land and operate a submarine cable in Aruba, a company must first obtain an international telecommunications license from the DTZ.⁹ As stated by the DTZ itself, “[t]he

⁵ See SETAR Certification at ¶4.

⁶ *Id.* at ¶7.

⁷ See Exhibits 1 and 2.

⁸ Exhibit 1 (SETAR Certification) at ¶7.

⁹ *Id.* at ¶5.

procedures that a foreign telecom company would need to follow to obtain permission to land the cable and operate a cable landing station in Aruba is that [the foreign telecom company] would need to be an established telecom company in Aruba and to be in possession of an international telecommunications licenses issued by the Minister of Telecommunications Affairs.”¹⁰ The process to obtain an international telecommunications license is detailed in the Aruban Telecom Act and there are no statutory limits on the number of international telecommunications licenses that may be issued.¹¹

International telecommunications licenses have been available in Aruba since January 1, 2005, licensees may provide services using their own infrastructure (*i.e.*, facilities) or the facilities of other international telecommunications service licensees and there are no limits on the number of international licenses that may be granted.¹² As to SETAR and the PCCS specifically, in order to land the PCCS in Aruba and operate a cable landing station, SETAR has requested authorization from the following Aruban government departments: (i) the Minister of Telecommunications; (ii) the Minister of Transport; (iii) DTZ; and (iv) the Directorate of Shipping Aruba. The DTZ has confirmed that applicants to land and operate a submarine cable in Aruba must obtain authorization from Aruba governmental regulatory agencies and has confirmed that “the process with these agencies would be the same if the applicant is owned by Aruban nationals or by foreign investors.”¹³ Given the attached SETAR Certification and DTZ Letter, the Applicants submit that any other international services licensee in Aruba, including any licensee owned or controlled by a U.S. carrier, would go through the exact same process in order to land a submarine cable and operate a cable landing station in Aruba.

¹⁰ Exhibit 2 (DTZ Letter).

¹¹ *Id.*

¹² Exhibit 1 (SETAR Certification) at ¶6.

¹³ Exhibit 2 (DTZ Letter)

As to interconnection to, and backhaul from, the cable landing station, in the Application at p.7, the applicants represent that “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.” There is nothing in the applicable laws of Aruba that would make such access or collocation impermissible.¹⁴ In addition, U.S. companies will have a right to use any capacity that they own in the PCCS cable or other cables landing in Aruba to provide services to Aruba and will be permitted interconnection, co-location and backhaul facilities by SETAR at reasonable market prices and non-discriminatory terms and rates.¹⁵

In short, there have been no known denials or conditions placed on U.S. companies that have ownership interests in submarine cables that land in Aruba, there have been no complaints filed in Aruba or the Commission that such impediments exist, there is no evidence that U.S.-licensed companies with ownership interests in submarine cables that land in Aruba have been or are subject to any regulatory requirements that are not also applicable to SETAR and there is no evidence of any anti-competitive conduct against U.S.-licensed companies with ownership interests in submarine cables that land in Aruba.

Finally, Aruba is a small country, consisting of a total of only 69.1 square miles. As discussed by the Commission, Aruba is precisely the poster child for the recently proposed modifications to the ECO test:

[a]s this example [TAS Resources/Aruba] suggests, the current detailed ECO Test criteria that apply to section 214 authority applications were designed primarily to be applied to advanced telecommunications markets that can support a complex regulatory regime. Smaller countries, however, may have relatively open markets even if their regulatory regimes do not fully meet all section 63.18 standards.”¹⁶

¹⁴ Exhibit 1 (SETAR Certification) at ¶10.

¹⁵ *Id.* at ¶11.

¹⁶ *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market Notice* at ¶10.

Thus, although these statements were made in the context of a Section 214 ECO test analysis, the notion that the current detailed ECO test criteria are not designed for smaller telecommunications markets such as that of Aruba is also applicable in the context of a submarine cable landing license ECO test analysis. Indeed, the the Commission has previously found that the Aruba market is competitive and U.S. carriers are able to enter and provide services in Aruba.¹⁷

Based on the SETAR Certification and the DTZ Letter, the Applicantst respectfully submit that Aruba affords U.S.-owned companies a level playing field to land and operate a submarine cable and thus meets the requirements of the ECO test.

II. Revised Appendices

As discussed with Commission staff, attached herewith as Exhibit 3 are revised Appendices A through L to the Application. The only substantive revisions consist of (a) updated foreign affiliate information for applicants Cable & Wireless (BVI) Limited (Appendix A), Cable & Wireless (EWC) Limited (Appendix B), and Cable & Wireless Panama S.A. (Appendix C); (b) the deletion of the requests for streamlined processing of the Application in each appendix because of the non-WTO status of Aruba; and (c) the inclusion of language reflecting the acceptance of the conditions contained in Section 1.767(l) of the Commission's rules as follows:

Appendix A: Cable & Wireless (BVI) Limited with respect to the U.S./British Virgin Islands and the U.S./Panama routes of the PCCS because Cable & Wireless (BVI) Limited is presumed by the Commission to have market power in the British Virgin Islands and it is affiliated with Cable & Wireless Panama S.A. (presumed by the Commission to have market power in Panama).

¹⁷ In paragraph 19 of the *Reform of Rules and Policies on Foreign Carrier Entry Into the U.S. Telecommunications Market Notice*, the Commission recognized that “[t]he Bureau found that U.S. carriers have the legal ability to enter and provide telecommunications services in [Aruba].”

- Appendix B: Cable & Wireless (EWC) Limited with respect to the U.S./British Virgin Islands and the U.S./Panama routes of the PCCS because it is affiliated with Cable & Wireless (BVI) Limited (presumed to have market power in the British Virgin Islands) and Cable & Wireless Panama S.A. (presumed by the Commission to have market power in Panama).
- Appendix C: Cable & Wireless Panama S.A. with respect to the U.S./British Virgin Islands and the U.S./Panama routes of the PCCS because it is presumed by the Commission to have market power in Panama and is affiliated with Cable & Wireless (BVI) Limited (presumed by the Commission to have market power in the British Virgin Islands).
- Appendix D: SETAR with respect to the U.S./Aruba route of the PCCS because SETAR is presumed by the Commission to have market power in Aruba.
- Appendix H: Telefonica International Wholesale Services America S.A. with respect to the U.S./Colombia route of the PCCS because it is affiliated with Colombia Telecomunicaciones, S.A. ESP (presumed by the Commission to have market power in Colombia).
- Appendix I: Telefonica International Wholesale Services USA, Inc. with respect to the U.S./Colombia route of the PCCS because it is affiliated with Colombia Telecomunicaciones, S.A. ESP (presumed by the Commission to have market power in Colombia).
- Appendix J: TI Wholesale Services Puerto Rico, Inc. with respect to the U.S./Colombia route of the PCCS because it is affiliated with Colombia Telecomunicaciones, S.A. ESP (presumed by the Commission to have market power in Colombia).
- Appendix K: Telefonica International Wholesale Services Colombia S.A. with respect to the U.S./Colombia route of the PCCS because it is affiliated with Colombia Telecomunicaciones, S.A. ESP (presumed by the Commission to have market power in Colombia).

The remaining revisions to the appendices are minor and have been made for purposes of consistency and clarification.

In addition, the certifications included in the appendices have been re-executed to certify the accuracy of the revisions.

In view of the foregoing, the Applicants request that the Commission associate this Supplement with the Application and substitute the revised appendices in Exhibit 2 for the original Appendices A-L filed as part of the Application.

Dated May 24, 2013

Respectfully Submitted,

Cable and Wireless (BVI) Limited
Cable & Wireless (EWC) Limited
Cable & Wireless Panama S.A.
Servicio di Telecomunicacion di Aruba (SETAR) N.V.
Cable Andino Inc.
Cable Andino USA, Inc.
Cable Andino S.A. Corpandino
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.
Antelecom N.V.

By:



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Exhibit 1: SETAR Certification

CERTIFICATION

I, Z. Roland Croes, hereby certify under penalty of perjury that:

1. I am Director of Servicio di Telecomunicacion di Aruba (SETAR) N.V. ("SETAR"), an applicant for a submarine cable landing license (File No. SCL-LIC-20130122-00001), (the "Application").

2. The purpose of this Certification is to supplement the information contained in the Application regarding satisfaction of the Federal Communications Commission Economic Competitive Opportunities test with respect to Aruba in the context of the proposed Pacific Caribbean Cable System ("PCCS"). This Certification is intended to be an attachment to a supplement to the Application (the "Supplement"). I have read and am familiar with the Supplement.

3. I am familiar with the legal and regulatory environment in Aruba as it relates to the telecommunications marketplace, including the landing and operation of submarine cables in Aruba.

4. To the best of my knowledge and belief: (A) there are no impediments in Aruba to the legal ability of U.S.-licensed companies to have ownership interests in submarine cables landing in Aruba; and (B) there are no impediments in Aruba to the practical ability of U.S. licensed companies to have ownership interests in submarine cables landing in Aruba. In fact, in one of the two submarine cables currently landing in Aruba, the Pan-American cable system ("PAN-AM"), there are multiple U.S.-licensed companies holding an ownership interest in such cable. The PAN-AM cable lands among other points in Baby Beach, Aruba and in St. Croix, U.S. Virgin Islands and has been previously licensed by the Commission (SCL-LIC-19970421-00002).

5. To the best of my knowledge and belief in order for a company to land and operate a submarine cable in Aruba, a company must first obtain an international telecommunications license from the Aruban telecommunications regulator, the Directie Telecommunicatie Zaken (“DTZ”).

6 To the best of my knowledge and belief; (A) international telecommunications licenses have been available in Aruba since January 1, 2005; (B) international telecommunications service licensees may provide services using their own infrastructure (*i.e.*, facilities) or the facilities of other international telecommunications service licensees; and (C) there are no limits on the number of international licenses that may be granted.

7. To the best of my knowledge and belief, there are no foreign ownership or other restrictions on the ability of U.S. carriers to enter the Aruban market to provide international telecommunications services, provided that they do so through a subsidiary organized under the laws of Aruba. To date, several providers have obtained international telecommunications service licenses and are operating in Aruba. In addition to SETAR, the following companies have obtained international telecommunications licenses from DTZ and are currently operating in Aruba:

- (i) MIO Group, Ltd. (“MIO”). MIO is a pan-Caribbean telecommunication operator. MIO is majority-owned and controlled by Cartesian Capital Group, LLC, a U.S. private equity firm based in New York.

(ii) Digicel, an international telecommunications provider with operations throughout the Caribbean and Central America. Digicel is owned and controlled by Mr. Denis O'Brien, an citizen of Ireland.

(iii) Scarlet, a wholly-owned subsidiary of Belgacom (Belgium's national carrier) which operates under the trade name "Rainbownet".

8. In order to land the PCCS cable in Aruba and operate a cable landing station SETAR has requested authorization from the following Aruban government departments: (i) the Minister of Telecommunications; (ii) the Minister of Transport; (iii) DTZ; and (iv) the Directorate of Shipping Aruba. The authorization process is ongoing.

9. To the best of my knowledge and belief, any other international services licensee in Aruba, including any licensee owned or controlled by a U.S. carrier, would need to go through the exact same process outlined in item 8 above in order to land a submarine cable and operate cable landing station in Aruba.

10. In the Application at p.7, the applicants, including SETAR, represent that "[a]ll 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." To the best of my knowledge and belief, there is nothing in the applicable laws of Aruba that would make such access or collocation impermissible or otherwise impede such access or collocation.

11. U.S. companies will have a right to use any capacity that they own in the PCCS cable or other cables landing in Aruba to provide services to Aruba and will be permitted



interconnection, co-location and backhaul facilities by SETAR at reasonable market prices and non-discriminatory terms and rates.

12. To the best of my knowledge and belief, the factual allegations contained in the Supplement and this Certification with respect to Aruba and SETAR are true and correct.

By: _____
Name: Z. Roland Croes
Title: Director
Servicio di Telecomunicacion di Aruba
(SETAR) N.V.

Date: May 23, 2013

Exhibit 2: DTZ Letter



ARUBA

DIRECTIE TELECOMMUNICATIEZAKEN
RUMBA STRAAT 19
TEL: +297-582-6069
FAX: +297-582-5307
E-mail: dirtelza@setarnet.aw

-1817

obfgek.
17-5-2013

Directie 17/5
Alvin Boekhoud
Rick Felix

To whom this may concern

Ons kenmerk: DTZ/943/2013/DIR

Onderwerp: landing Pacific Caribbean Cable System in Aruba

Datum: 16 mei 2013

The Regulatory Department of Aruba, Directie Telecommunicatie Zaken (DTZ), has the following procedure regarding the process for obtaining permission to land and operate a submarine cable system in Aruba. The procedures that a foreign telecom company would need to follow to obtain permission to land the cable and operate a cable landing station in Aruba is that they would need to be an established telecom company in Aruba and to be in possession of an international telecommunications license issued by Minister of Telecommunications Affairs. The process to obtain an international telecommunications license is detailed in the Aruban Telecom Act. There are no statutory limits on the number of international telecommunications licenses that may be issued; and, to date, DTZ has issued several such licenses, including to entities owned by foreign investors. In addition to obtaining authorization from DTZ to land and operate a submarine cable in Aruba, an applicant would also need to obtain approvals from other agencies of the Government of Aruba. The process with these agencies would be the same if the applicant is owned by Aruban nationals or by foreign investors.

Please do not hesitate to contact the undersigned if you have any questions.

Director Directie Telecommunicatiezaken

J.L. Jansen, MSc.

Exhibit 3: Revised Appendices A-L

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 provides retail, fixed, cellular and broadband services, connecting customers regionally and internationally. It also provides wholesale voice, Internet and data services. Cable and Wireless (BVI) Limited is the incumbent local exchange carrier that is presumed by the Commission to have market power in the British Virgin Islands.²⁶

Cable and Wireless (BVI) Limited 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.

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) (hereinafter referred to as "Public Notice, DA 07-233 (Jan. 26, 2007)"). Please note that the list identifies Cable & Wireless (West Indies) Limited as the entity presumed to have market power in the British Virgin Islands. In fact, it is Cable and Wireless (BVI) Limited, a wholly-owned subsidiary of Cable and Wireless (West Indies) Limited, that is the local exchange carrier in the British Virgin Islands.

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:

Simeon Irvine
C&W Communications plc
Floor 3
26 Red Lion Square
London, UK
WC1R4HQ
simeon.irvine@cw.com
Tel: +44 207 315 4000
Fax: +44 207 315 5211

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: Roderick Kirwan, 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 (TCI) Limited
 Telecommunications Services of Trinidad and Tobago Limited
 Cable and Wireless Network Services 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 Jamaica Limited* | Jamaica |
| 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 & 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 |
| 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 |

* 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.

** Cable & Wireless Communications Plc currently controls a 55% ownership interest in Monaco Telecom S.A.M. through its 75% ownership interest in Compagnie Monegasque de Communication SAM (“CMC”) which is subject to certain put and call arrangements with Bahrain Telecommunications Company. Monaco Telecom International S.A.M. is a wholly-owned subsidiary of Monaco Telecom S.A.M.

*** 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. When this transaction completes ownership of CTM, TeleOne (Singapore) Pte Limited and CTM (HK) Limited will transfer to CITIC Telecom and these companies will no longer be affiliated to the applicant. 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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

Cable and Wireless (BVI) Limited is presumed to have market power in the British Virgin Islands and is affiliated with a foreign carrier that is presumed to have market power in Panama, both of which are members of the WTO. Although it is not requesting streamlined processing for the Application, Cable and Wireless (BVI) Limited understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, Cable and Wireless (BVI) Limited hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.-Panama and U.S.-British Virgin Islands cable routes.

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.

Date: 23/5/13

By  _____

Roderick Kirwan
Director
Cable and Wireless (BVI) Limited

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:

Simeon Irvine
C&W Communications plc
Floor 3
26 Red Lion Square
London, UK
WC1R4HQ
simeon.irvine@cw.com
Tel: +44 207 315 4000
Fax: +44 207 315 5211

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: Ronald Joseph, a member of Cable & Wireless (EWC) Limited’s board of directors, is also a member of the board of directors of the following foreign carriers:

- Cable & Wireless Dominica Limited
- Cable & Wireless Grenada Limited

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 Jamaica Limited* | Jamaica |
| 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 & 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 |
| Divona Algeria 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 |

* 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.

** Cable & Wireless Communications Plc currently controls a 55% ownership interest in Monaco Telecom S.A.M. through its 75% ownership interest in Compagnie Monegasque de Communication SAM (“CMC”) which is subject to certain put and call arrangements with Bahrain Telecommunications Company. Monaco Telecom International S.A.M. is a wholly-owned subsidiary of Monaco Telecom S.A.M.

*** 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. When this transaction completes ownership of CTM, TeleOne (Singapore) Pte Limited and CTM (HK) Limited will transfer to CITIC Telecom and these companies will no longer be affiliated to the applicant. 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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

Cable & Wireless (EWC) Limited is affiliated with foreign carriers presumed to have market power in Panama and the British Virgin Islands, both of which are members of the WTO. Although it is not requesting streamlined processing for the Application, Cable and Wireless (EWC) Limited understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, Cable & Wireless (EWC) Limited hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.-Panama and U.S.-British Virgin Islands cable routes.

CERTIFICATION

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

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

Date:

By

A handwritten signature in dark ink, appearing to read 'RJ', is written over a horizontal line. The signature is slanted and somewhat stylized.

Ronald Joseph
Director
Cable & Wireless (EWC) Limited

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. Cable & Wireless Panama S.A. is the incumbent local exchange carrier that is presumed by the Commission to have market power in Panama.²⁷

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

²⁷ See Public Notice, DA 07-233 (Jan. 26, 2007).

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

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 Jamaica Limited* | Jamaica |
| 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 & 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 |
| 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 |

* 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.

** Cable & Wireless Communications Plc currently controls a 55% ownership interest in Monaco Telecom S.A.M. through its 75% ownership interest in Compagnie Monegasque de Communication SAM (“CMC”) which is subject to certain put and call arrangements with Bahrain Telecommunications Company. Monaco Telecom International S.A.M. is a wholly-owned subsidiary of Monaco Telecom S.A.M.

*** 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. When this transaction completes ownership of CTM, TeleOne (Singapore) Pte Limited and CTM (HK) Limited will transfer to CITIC Telecom and these companies will no longer be affiliated to the applicant. 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. ACCEPTANCE OF 47 C.F.R. § 1.767(I) REPORTING REQUIREMENTS

Cable & Wireless Panama S.A. is presumed to have market power in Panama and is affiliated with a foreign carrier presumed to have market power in the British Virgin Islands, both of which are members of the WTO. Although it is not requesting streamlined processing for the Application, Cable and Wireless Panama S.A. understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(I) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, Cable & Wireless Panama S.A. hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(I) as to the U.S.-Panama and U.S.-British Virgin Islands cable routes.

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.

Date: 22.5.13

By 

ALEX ARROYO
CABLE + WIRELESS PANAMA S.A.

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

Servicio di Telecomunicacion di Aruba (SETAR) N.V. 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, Aruba’s national telecommunication provider, is the principal telecommunication company on the island and is the incumbent local exchange carrier that is presumed by the Commission to have market power in Aruba.²⁸ SETAR provides solutions for Fixed line, Mobile, Internet and Data. For international telecommunications, SETAR connects to the outside world via circuit switches and VoIP platforms. The international network of SETAR consists of two earth stations and fiber submarine cables via the Pan American and Alonso de Ojeda / Americas-2 cable systems.

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 (SETAR) N.V.
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 (SETAR) N.V.

²⁸ See Public Notice, DA 07-233 (Jan. 26, 2007).

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 PCCS destination 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. SETAR has no other affiliations with foreign carriers in any other destination (PCCS landing) country.

Information requested by Section 63.18(k):

Aruba is not a member of the WTO. As discussed in Section II of this Application, Aruba satisfies the Effective Competitive Opportunities test as to the landing of the PCCS in 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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

SETAR is presumed to have market power in Aruba and is not affiliated with a foreign carrier in any of the PCCS's other landing station markets. Although it is not requesting streamlined processing for the Application, SETAR understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, and because Aruba is a non-WTO destination, SETAR hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.-Aruba cable route.

CERTIFICATION

I am authorized to enter this certification on behalf of Servicio di Telecomunicacion di Aruba (SETAR) N.V.

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

Date: 23/8/13

By _____
Zenovio Roland Croes
Director
Servicio di Telecomunicacion di Aruba (SETAR)
N.V.
Seroe Blanco 29-A
Oranjestad, Aruba
Tel: +297 525-1445

APPENDIX E — CABLE ANDINO INC.

Cable Andino Inc. is a Bahamas corporation having its principal place of business in Ecuador and is wholly owned by Telconet S.A., a competitive communications carrier. 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.

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. 47 C.F.R. § 1.767(l) REPORTING REQUIREMENT STATEMENT

Although it is not requesting streamlined processing for the Application, Cable Andino, Inc. understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. However, Cable Andino, Inc. and its only affiliated foreign carrier, Telconet S.A., are competitive carriers that lack 50 percent market share in the international transport and the local access markets in Ecuador. Therefore, the requirements contained in 47 C.F.R. § 1.767(l) are not applicable to Cable Andino, Inc.

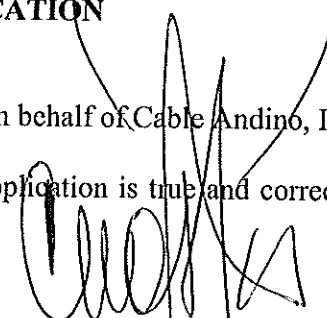
CERTIFICATION

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: 22-05-2013

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 Pazmiño is a member of Cable Andino USA Inc.'s board of directors and is also on the board of the foreign carrier Cable Andino Inc.

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 following foreign carriers in in PCCS destination country of Ecuador: Cable Andino, Inc. and Telconet S.A. 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. 47 C.F.R. § 1.767(l) REPORTING REQUIREMENT STATEMENT

Although it is not requesting streamlined processing for the Application, Cable Andino, USA, Inc. understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. However, Cable Andino USA, Inc. is not—a foreign carrier in any of the PCCS destination markets. and its only affiliated foreign carriers, Cable Andino, Inc. and Telconet S.A., are competitive carriers that lack 50 percent market share in the international transport and the local access markets in Ecuador. Therefore, the requirements contained in 47 C.F.R. § 1.767(l) are not applicable to Cable Andino USA, Inc.

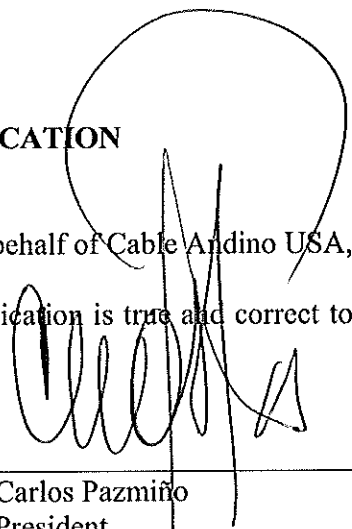
CERTIFICATION

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: 22-05-2013

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 Pazmiño 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. 47 C.F.R. § 1.767(l) REPORTING REQUIREMENT STATEMENT

Although it is not requesting streamlined processing for the Application, Cable Andino S.A. Corpandino understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. However, Cable Andino S.A. Corpandino is not-a foreign carrier in any of the PCCS destination markets. and its only affiliated foreign carriers, Cable Andino, Inc. and Telconet S.A., are competitive carriers that lack 50 percent market share in the international transport and the local access markets in Ecuador. Therefore, the requirements contained in 47 C.F.R. § 1.767(l) are not applicable to Cable Andino S.A. Corpandino.

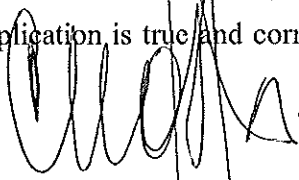
CERTIFICATION

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: 22-05-2013

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 Bucaresti |
| 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*.²⁹

Information requested by Section 63.18(j):

TIWS América is not a foreign carrier. TIWS América controls the following PCCS destination country foreign carriers: **Colombia**: Telefónica International Wholesale Services Colombia, S.A., and **Ecuador**: Telefónica International Wholesale Services Ecuador, S.A. TIWS América does not control but is affiliated with the following PCCS destination country foreign carrier in **Panamá**: Telefónica Móviles Panamá, S.A.

²⁹ See Public Notice, DA 07-233 (Jan. 26, 2007).

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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

TIWS América is not a foreign carrier but is affiliated with foreign carrier presumed to have market power in Colombia which is a member of the WTO. Although it is not requesting streamlined processing for the Application, TIWS América understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, TIWS América hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.-Colombia cable route.

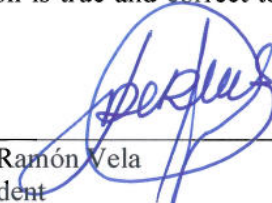
CERTIFICATION

I am authorized to enter this certification on behalf of TIWS América.

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

Date:

By



José Ramón Vela
President
Telefonica International Wholesale Services
América S.A.
Av. Luis A. de Herrera 1248, 4th Floor –
11300 Montevideo, Uruguay
Tel: + 598 2 628 00

**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 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 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*.³⁰

Information requested by Section 63.18(j):

TIWS USA is not a foreign carrier. With respect to the destination countries for the PCCS, TIWS USA does not control any foreign carriers and 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.

Information requested by Section 63.18(k):

Colombia, Panamá and Ecuador are all members of the WTO.

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.

³⁰ See Public Notice, DA 07-233 (Jan. 26, 2007).

(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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

TIWS USA is not a foreign carrier but is affiliated with foreign carrier presumed to have market power in Colombia which is a member of the WTO. Although it is not requesting streamlined processing for the application, TIWS USA understands that the commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an applicant or an affiliate of an applicant is presumed to have market power. Therefore, TIWS USA hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.- Colombia cable route.

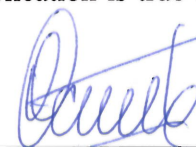
CERTIFICATION

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.

Date:

By:



Guillermo Cañete
President
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

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 PR 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 PR is a privately-held U.S. company. TIWS PR 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. (*) |
| | Telefónica Brasil, S.A. (*) |

| Destination Country | Foreign Carriers Affiliates |
|----------------------------|-------------------------------------------------------------------------------------------|
| | 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 |
| Germany | Telefónica Gennany GmbH & Co. OHG |

| Destination Country | Foreign Carriers Affiliates |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------|
| 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 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 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 |
| Portugal | Telefónica International Wholesale Services II, S.L. Unipersonal sucursal em Portugal |

| Destination Country | Foreign Carriers Affiliates |
|----------------------------|-------------------------------------------------------------------------------------------------------------|
| 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 (*) |
| | 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*³¹

Information requested by Section 63.18(j):

TIWS PR is not a foreign carrier. TIWS PR does not control any destination country foreign carriers. TIWS PR is affiliated with foreign carriers in **Colombia**: Telefónica Móviles Colombia, S.A., Colombia Telecomunicaciones, S.A. ESP, and Telefónica International

³¹ See Public Notice, DA 07-233 (Jan. 26, 2007).

Wholesale Services Colombia, S.A.; **Ecuador**: Otecel, S.A. and Telefónica International Wholesale Services Ecuador, S.A.; and **Panamá**: Telefónica Móviles Panamá, S.A.

Information requested by Section 63.18(k):

Colombia, Panamá and Ecuador are all members of the WTO.

Information requested by Section 63.18(o):

TIWS PR 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 PR 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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

TIWS PR is not a foreign carrier but is affiliated with foreign carrier presumed to have market power in Colombia which is a member of the WTO. Although it is not requesting streamlined processing for the Application, TIWS PR understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, TIWS PR hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.- Colombia cable route.

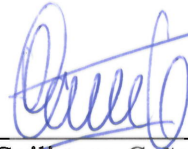
CERTIFICATION

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:

By:



Guillermo Cañete
President
TI 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

**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 ierobežotu 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 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 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*.³²

Information requested by Section 63.18(j):

TIWS Colombia is a non-dominant foreign carrier in Colombia. TIWS Colombia does not control any destination country foreign carriers. With respect to the destination countries for the PCCS, TIWS Colombia 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.

Information requested by Section 63.18(k):

³² 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).

Columbia, Ecuador and Panama are all members of the WTO.

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. ACCEPTANCE OF 47 C.F.R. § 1.767(l) REPORTING REQUIREMENTS

TIW Colombia is affiliated with a foreign carrier that is presumed to have market power in Colombia, which is a member of the WTO. Although it is not requesting streamlined processing for the Application, TIWS Colombia understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where an Applicant or an affiliate of an Applicant is presumed to have market power. Therefore, TIWS Colombia hereby agrees to accept and abide by the reporting requirements contained in 47 C.F.R. § 1.767(l) as to the U.S.-Colombia cable route.

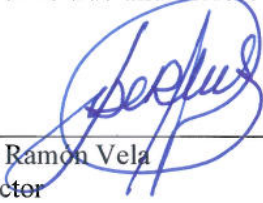
CERTIFICATION

I am authorized to enter this certification on behalf of Telefonica 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:

By:



José Ramon Vela
Director
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 Berg Arrarat 1, 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.
Berg Arrarat 1
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.
Berg Arrarat 1
Willemstad, Curacao
Tel: +5999 7771282

With copies to:

United Telecommunication Services N.V.
Legal Department
Berg Arrarat 1
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., Berg Arrarat 1, 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 Berg Arrarat 1, Willemstad, Curaçao.

Interlocking Directorates: Mr. P.T. de Geus, a member of Antelecom's board of directors, is also a member of the board of directors of the following foreign carriers: Setel N.V. (Curacao); Radcomm Corporation N.V. (Sint Maarten); United Telecommunication Services French West Indies S.A.R.L. (Saint Maarten), a 99% shareholder in operating company UTS Caraibe S.A.R.L. (Saint Martin); United Telecommunication Services Suriname NV (Surinam), a 80% shareholder in operating company International Telecommunication Suriname N.V. (Surinam); 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 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. 47 C.F.R. § 1.767(l) REPORTING REQUIREMENT STATEMENT

Although it is not requesting streamlined processing for the Application, Antelecom understands that the Commission will nonetheless require acceptance of the requirements contained in 47 C.F.R. § 1.767(l) as to any routes between the U.S. and a destination point where

an Applicant or an affiliate of an Applicant is presumed to have market power. However, Antelecom is not-a foreign carrier in any of the PCCS destination markets, and it is not affiliated with any foreign carriers in any PCCS destination markets. Therefore, the requirements contained in 47 C.F.R. § 1.767(1) are not applicable to Antelecom.

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: May 24th, 2013

By 
P.T. de Geus
Chief Executive Officer
Antelecom N.V.
Berg Arrarat 1
Willemstad, Curacao
Tel: + 5999 7770101

CERTIFICATE OF SERVICE

I, Matthew W. Lewis, do hereby certify that on May 24, 2013, I served a copy of the above Supplement to FCC application File No. SCL-LIC-20130122-00001, applying 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



Matthew W. Lewis