

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

In the Matter of)	
)	
EMERALD NETWORKS HOLDINGS)	
LIMITED)	File No. SCL-LIC-20140206-00002
)	
Application for a License to Land and)	
Operate a Fiber Optic Submarine Cable)	
System Linking the United States, Iceland)	
and Ireland)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Homeland Security (“Department”) submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, the Department advises the Commission that it has no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of Emerald Networks Holdings Limited (“Emerald”) to abide by the commitments and undertakings set forth in the October 1, 2014 Letter of Assurances (“LOA”), which is attached hereto.

In the above-referenced proceeding, Emerald filed for a license to construct, land and operate a non-common carrier fiber-optic submarine cable system linking the United States, Iceland, and Ireland (the Emerald Express Cable System).

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat*

¹ 47 C.F.R. § 1.41.

Corporation d/b/a Comsat Mobile Communications, etc., 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of Emerald in connection with the above-referenced proceeding, the Department has concluded that the additional commitments set forth in the LOA will help ensure that the Department can proceed appropriately to satisfy its responsibility for enforcing the law, protecting the national security, and preserving public safety. Accordingly, the Department advises the Commission that it has no objection to the Commission granting the application in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by Emerald with the LOA.

Respectfully submitted,

/S/ Shawn Cooley

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