

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

In the Matter of)
)
ALGAR TELECOM S/A, ANGOLA)
CABLES S.A., ADMINISTRACIÓN)
NACIONAL DE TELECOMUNICACIONES) File No. SCL-LIC-2015-_____
and GU HOLDINGS INC.)
)
Application for a License to Construct, Land,)
and Operate an Undersea Fiber Optic Cable)
Connecting the U.S. and Brazil)

APPLICATION FOR A CABLE LANDING LICENSE
STREAMLINED PROCESSING REQUESTED

Algar Telecom S/A (“Algar Telecom”), Angola Cables S.A. (“Angola Cables”),
Administración Nacional de Telecomunicaciones (“ANTEL”), and GU Holdings Inc. (“GU
Holdings”)¹ (collectively, the “Parties” or the “Applicants”), pursuant to the Act Relating to the
Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§34-39, Executive
Order 10,530, and Section 1.767 of the Commission’s rules, 47 C.F.R. §1.767, each request a
license to operate a non-common carrier fiber-optic submarine telecommunications cable
extending between the U.S. and Brazil. This submarine cable system will be called the Monet
Cable System (“Monet”).

For the reasons set forth below, Applicants respectfully submit that the grant of this
application will serve the public interest and should be granted on a streamlined basis.

¹ GU Holdings is an indirect, wholly-owned subsidiary of Google Inc. (“Google”).

I. DESCRIPTION OF THE CABLE SYSTEM

A. General Description

Construction of Monet is scheduled to begin immediately, and the target for making capacity available is the end of 2016. Monet will land in three locations: Boca Raton, Florida, Santos, Brazil, and Fortaleza, Brazil. The system will have three segments: Segment 1 from Boca Raton to a branching unit (“BU”), Segment 2 from Fortaleza to the BU, and Segment 3 from Santos to the BU. The principal portion of Monet (the “Main System”), composed of Segment 1 and Segment 3, will have six fiber pairs with a total capacity of 64 Terabits per second (“Tbps”). Segment 2 (the “Branch Leg”), will have ten (10) fiber pairs with a total capacity of 32 Tbps. The system will have a total length of 10,556 kilometers and an expected useful life of 25 years. A geographic overview and conceptual system configuration are provided in Appendix E.

B. Construction and Operation of Monet

Monet will be owned, operated, and maintained by Applicants pursuant to a Joint Build Agreement (“JBA”).² Ownership interests are set forth in Section IV.D. below, and details regarding each of the Applicants are provided in Appendices A through D. An Executive Committee, composed of one representative named by each of the Parties, will manage Monet’s common infrastructure.³ The Executive Committee is responsible for directing the engineering, construction, operation, and maintenance of Monet. Decisions of the Executive Committee will

² Two indirect, wholly-owned subsidiaries of Google—Google Cable Bermuda Ltd. (“GCB”) and Google Infrastructure Bermuda Ltd. (“GIB”)—are parties to the JBA and will own all of Google’s capacity in Monet outside of the U.S. Each of GCB and GIB is a company organized under the laws of Bermuda.

³ The Parties will jointly own Monet’s common infrastructure, which includes the subsea plant and the landing and terminal equipment. Individual Parties will own and manage individual fiber pairs and the associated equipment.

be by consensus or a simple majority, except for certain major actions that require a super-majority or unanimity. The Executive Committee may appoint working groups to carry out its responsibilities.

Applicants have entered into a Supply Contract with Tyco Electronics Subsea Communications LLC (“TE SubCom”) for the construction of Monet, including the subsea plant and certain terrestrial transmission facilities associated with the system. TE SubCom has overall design responsibility and will supply the dry plant equipment.

GU Holdings is the landing party for Monet in the U.S. The landing parties for Monet in Brazil are GU Holdings (Santos landing)⁴ and Angola Cables (Fortaleza landing). Applicants have entered into a United States Landing Party Agreement, a Santos Landing Party Agreement, and a Fortaleza Landing Party Agreement. Those agreements will govern the relationship between the landing party and the other Parties at each landing point. At each landing station, individual Parties may connect their capacity to the domestic network or other international cable systems.

The primary Network Operations Center (“NOC”) for Monet will be located in the United States.

C. Control of U.S. Facilities and Equipment

Applicants intend to enter into contractual arrangements with third parties to operate and manage the U.S. facilities associated with Monet, including the landing and terminal equipment, terrestrial transmission facilities associated with the U.S. landing, as well as the U.S. NOC.

⁴ The Santos Landing Party Agreement provides that GU Holdings may assign to a Brazilian affiliate its responsibilities as landing party in Santos prior to operation of the Santos landing station. GU Holdings will promptly advise the Commission should this assignment take place.

Negotiations with potential vendors, all of whom are U.S. persons, are ongoing, and Applicants will promptly advise the Commission once a vendor is selected. Regardless of the vendor, U.S. common infrastructure will be controlled and operated by the U.S. NOC. The vendor contract will provide for proper control and the authority to direct the vendor in all matters relating to Monet's U.S. common infrastructure.

II. PUBLIC INTEREST STATEMENT

Grant of this application will serve the public interest, convenience, and necessity by making advanced facilities-based telecommunications services available between the U.S. and foreign points. Specifically, Monet will (i) help connect U.S. Internet users and businesses to South America, one of the world's strongest markets for Internet growth; (ii) increase competition on U.S.-South America routes, and (iii) enhance the service quality, redundancy, and resilience of communications systems in the region.

A. Monet Will Connect the U.S. to One of World's Strongest Markets for Internet Growth

In 2013, South America's online population grew by 12%, "significantly higher than the Asia-Pacific region (7%), Europe (5%), Africa and the Middle East (3%), and North America (1%)."⁵ With its capacity of 64 Tbps, state-of-the art infrastructure, and direct route to Brazil, Monet will help connect U.S. Internet users and businesses to this fast-growing market for years to come.

⁵ *Submarine Telecoms Industry Report 2014*, available at <http://www.terabitconsulting.com/downloads/2014-submarine-cable-market-industry-report.pdf>. ("SubTel Report").

B. Monet Will Increase Competition on U.S.-South America Routes

Additional capacity on the U.S.-Brazil route, and on U.S.-South America routes more generally, will promote facilities-based competition. The Commission has previously found that expanding submarine capacity through facilities-based competition serves the public interest. In its *Streamlining Report and Order*, the Commission noted that its new procedures were intended to “promote the expansion of capacity and competition in the submarine cable market.”⁶ Monet serves that objective. Upon deployment, it will immediately and significantly increase regional capacity. This may result in lower bandwidth prices, which are comparatively high in South America,⁷ which, in turn, would spur greater service innovation and lower prices for consumers of international communications services.

C. Monet Will Improve Service Quality and Increase Redundancy and Resiliency

The substantial increase in capacity that will result from Monet’s deployment will improve service for voice and high-bandwidth applications like video which makes up an increasing percentage of communications traffic between the U.S. and South America.⁸ In addition, by interconnecting with other submarine and terrestrial systems serving the region, Monet will reduce congestion on other networks and enable carriers and service providers to expand their dynamic routing.

Monet also will improve the redundancy and resiliency of the communications network in the region. Monet will interconnect, directly or indirectly, with many of the existing and

⁶ *Review of Commission Consideration of Applications under the Cable Landing License Act*, IB Docket No. 00-106, Report and Order, ¶76 (Dec. 14, 2001) (“Streamlining Report and Order”).

⁷ See SubTel Report at Section 5.3.1.

⁸ See SubTel Report at Section 5.3.2.

planned regional and international cables, thus providing additional transmission options in the event of disruptions to other systems—whether natural or manmade. U.S. consumers and carriers will have the ability to use capacity on Monet as an alternative and diverse transmission route between the U.S. and South America.

III. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

The Applicants' information required by Sections 1.767(a)(1)-(3) of the Commission's rules is contained in the attached Appendices:

Appendix A: Algar Telecom S/A

Appendix B: Angola Cables S.A.

Appendix C: Administración Nacional de Telecomunicaciones

Appendix D: GU Holdings Inc.

IV. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(4)-(7)

A. 47 C.F.R. § 1.767(a)(4): Description of the Cable

A general description of Monet is provided in Section I above, and a geographic overview and conceptual system configuration are provided in Appendix E.

B. 47 C.F.R. § 1.767(a)(5): Landing Stations

As described above, Monet will land in three locations: Boca Raton, Florida, Santos, Brazil, and Fortaleza, Brazil.

Boca Raton, Florida

Appendix F contains the following images and information about the Boca Raton landing: (1) a map of southern Florida including Boca Raton, (2) a map and satellite image showing the beach manhole location (with geographic coordinates) and potential area for the

cable landing station in Boca Raton, and (4) a photograph of the beach manhole location in Boca Raton. GU Holdings will promptly provide the Commission with updated images and geographic coordinates when the precise location of the cable landing station is finalized.

Santos, Brazil⁹

Appendix G contains the following images and information about the Santos landing: (1) a map of the Santos/Praia Grande area of Brazil, (2) a satellite image showing the potential beach manhole location (with geographic coordinates) in Santos/Praia Grande, and (3) a satellite image showing the potential area for the cable landing station in Santos/Praia Grande. GU Holdings will promptly provide the Commission with updated images and geographic coordinates when the precise locations of the beach manhole and cable landing station in Santos/Praia Grande are finalized.

Fortaleza, Brazil

Appendix H contains various satellite images showing the potential locations of the beach manhole (with geographic coordinates) and cable landing station in Fortaleza. GU Holdings will promptly provide the Commission with updated images and geographic coordinates when the precise locations of the beach manhole and cable landing station in Fortaleza are finalized.

C. 47 C.F.R. § 1.767(a)(6): Common Carrier/Non-Common Carrier Status

Monet will be operated on a private, non-common carrier basis. Pursuant to the *NARUC I* analysis, there is (1) no legal compulsion for the Applicants to serve the public indifferently and

⁹ Although this application and the various agreements between the Applicants refer to a landing in Santos, Brazil, Monet will land in Praia Grande, Brazil, which neighbors Santos to the southwest on the coast.

(2) no reason to expect that capacity on Monet will be offered indifferently and indiscriminately to the public, and thus no basis for finding common carriage status.¹⁰

With respect to the first prong of the *NARUC I* analysis, the Commission has focused on whether an applicant will be able to exercise market power because of the lack of alternative facilities.¹¹ In this instance, there are a variety of alternative facilities on existing and proposed cable systems. The systems currently serving the U.S.-Brazil route are Americas-II, GlobeNet, South America-1 (“SAM-1”), South American Crossing, and America Movil Submarine Cable System-1 (“AMX-1”).¹² A system called Seabras-1 also is expected to be licensed and ready for service within the next two years.¹³ Cable systems running from the U.S. to other locations in South America include Pan American (“PAN-AM”), Maya-1, ARCOS, Colombia-Florida Subsea Fiber (“CFX-1”), and Pacific Caribbean Cable System (“PCCS”), which should be ready for service this year.¹⁴ Thus, while Monet will substantially improve connectivity between the U.S. and South America, there are alternative facilities on the U.S.-Brazil and U.S.-South America routes and no reason for the Commission to require the Applicants to serve the public indiscriminately.

Under the second prong of the *NARUC I* analysis, the Commission considers whether there is any reason implicit in the nature of the application that the applicants would make capacity available to the public indifferently and indiscriminately. In this case, capacity on

¹⁰ *National Ass'n of Regulatory Utility Commissioners v. FCC*, 525 F.2d 630, 641 (D.C. Cir. 1976), *cert. denied*, 425 U.S. 992 (1976) (“*NARUC I*”).

¹¹ *See Cable and Wireless PLC*, 12 FCC Rcd 8516, ¶15 (1997); *Optel Communications, Inc.*, 8 FCC Rcd 2267, 2269 (1993).

¹² *See* SubTel Report at Section 5.3.1.

¹³ *Natixis Announces Closing of Seabras-1 Financing* (Jan. 29, 2104), available at: <http://www.seabornnetworks.com/natixis-announces-closing-of-seabras-1-financing/>.

¹⁴ *See* SubTel Report at Section 5.3.2.

Monet will be either used by the Applicants to meet their own internal needs for bandwidth or, as with other non-common carrier cable systems, made available to third parties based on individually tailored agreements. Because the Applicants will make “individualized decisions, in particular cases, [on] whether and on what terms to deal,” they will not hold out services indifferently when using capacity on Monet.

For these reasons, the Commission should find that Monet may be operated on a non-common carrier basis.

D. 47 C.F.R. § 1.767(a)(7): List of Owners and Ownership Interests

Applicants will own all common infrastructure of Monet in proportionate and indivisible shares according to the following percentage ownership interests:

Main System:

Party	Participation Interest	Voting Rights	Fiber Pairs
Algar Telecom	16.667%	16.667%	1.0
Angola Cables	33.333%	33.333%	2.0
ANTEL	16.667%	16.667%	1.0
GU Holdings ¹⁵	33.333%	33.333%	2.0

¹⁵ As previously noted, GCB and GIB will hold all of Google’s capacity outside of the U.S.

Branch Leg:

Party	Participation Interest	Voting Rights	Fiber Pairs
Algar Telecom	20.000%	20.000%	2.0
Angola Cables	40.000%	40.000%	4.0
ANTEL	20.000%	20.000%	2.0
GCB	20.000%	20.000%	2.0

V. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

A. Information Requested by 47 C.F.R. § 63.18(h)-(k)

Appendices A through D contain the information requested by Sections 63.18(h)-(k) of the Commission's rules for each of the Applicants.

B. Information Requested by 47 C.F.R. § 63.18(o)

Applicants' certifications, as required by 47 C.F.R. §§1.2001-1.2003, that they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, are contained in Appendices A through D.

VI. INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

Applicants' certifications that they accept and will abide by the routine conditions in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g), are contained in Appendices A through D.

VII. ELIGIBILITY FOR STREAMLINED PROCESSING UNDER 47 C.F.R. § 1.767(k)

As described in Appendices A through D, each of the Applicants qualifies for streamlined treatment. Therefore, this application is eligible for streamlined processing under Section 1.767(k) of the Commission's rules.

VI. CONCLUSION

The public interest, convenience and necessity will be served by a grant of this application to land and operate a private, non-common carrier, fiber optic submarine telecommunications cable between the U.S. and Brazil. Applicants respectfully request that the Commission grant this application on a streamlined basis.

Respectfully submitted,

/s/ Ulises R. Pin

Ulises R. Pin

William B. Wilhelm, Jr.

Morgan, Lewis & Bockius LLP

2020 K Street NW

Washington, DC 20006

Tel: (202) 373-6000

Fax: (202) 373-6001

Email: u.pin@morganlewis.com

william.wilhelm@morganlewis.com

Counsel for GU Holdings Inc.

Dated: April 6, 2015

APPENDICES

Appendix A: Algar Telecom S/A

Appendix B: Angola Cables S.A.

Appendix C: Administración Nacional de Telecomunicaciones

Appendix D: GU Holdings Inc.

Appendix E: Geographic Overview and Conceptual System Configuration

Appendix F: Images of U.S. Landing

Appendix G: Images of Santos Landing

Appendix H: Images of Fortaleza Landing

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served this date upon the following:

Marlene Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via first class U.S. mail, postage prepaid)	U.S. Coordinator EB/CIP U.S. Department of State 2201 C Street NW Washington, D.C. 20520-5818 (via first class U.S. mail, postage prepaid)
David Krech International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to david.krech@fcc.gov)	Office of Chief Counsel/NTIA U.S. Department of Commerce 14 th Street and Constitution Ave. NW Washington, DC 20230 (via first class U.S. mail, postage prepaid)
Susan O’Connell International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to susan.o’connell@fcc.gov)	Defense Information Systems Agency Attn: GC/DO1 6910 Copper Avenue Fort Meade, MD 20755-7088 (via first class U.S. mail, postage prepaid)
Mindel De La Torre International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to mindel.delatorre@fcc.gov)	Troy Tanner International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554 (via electronic mail to troy.tanner@fcc.gov)

/s/ Denise S. Wood

Denise S. Wood
April 6, 2015

APPENDIX A

ALGAR TELECOM S/A

ALGAR TELECOM S/A is a leading Brazilian telecommunications company. Through its subsidiaries it offers landline and mobile telephony, broadband Internet access (3G and ADSL), data communications, cable television, IT solutions, national and international long distance services in Brazil. Neither ALGAR TELECOM S/A nor any of its affiliates has previously applied for or received any licenses or operating authority from the Commission.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

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

ALGAR TELECOM S/A
Rua Jose Alves Garcia, 415,
Uberlandia, Minas Gerais, Brazil, 38400-668
Telephone: +5534 32562158

FRN Number: 0024376204

(2) Place of Formation:

ALGAR TELECOM S/A is a Brazilian corporation, organized under the laws of Brazil.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Marcelo Almeida Nunes
Wholesale Director
Rua Jose Alves Garcia, 415,
Uberlandia, Minas Gerais, Brazil, 38400-6691
Telephone: +5534 32562158
Marcelo.nunes@algartelecom.com.br

With a copy to:

Bruce A. Olcott
Jones Day
51 Louisiana Ave., N.W.
Washington, DC 20001-2113
Telephone: 202.879.3630
bolcott@jonesday.com



Two handwritten signatures in black ink, one on the left and one on the right, located at the bottom right of the page.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) Information Requested by 47 C.F.R. § 63.18(h):

ALGAR S/A EMPREENDIMENTOS E PARTICIPAÇÕES (owns 89,94% of the shares of ALGAR TELECOM S/A), Brazilian Corporation with its head office at Rua Lapa do Lobo, nº 800, Uberlândia, State of Minas Gerais, BRAZIL, CEP 38.405-385, registered in the CNPJ/MF under nº 17.835.026/0001-52 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

The ownership of the remaining 10.06% of Algar Telecom is widely dispersed and public traded in the Brazilian stock market.

ÁRVORE S/A EMPREENDIMENTOS E PARTICIPAÇÕES, (100% of the shares of ALGAR S/A EMPREENDIMENTOS E PARTICIPAÇÕES) Brazilian Corporation with its head office at Av. Floriano Peixoto, nº 7.001, Térreo - Parte I, Alto Umuarama, City of Uberlândia, State of Minas Gerais, Brazil, CEP 38.405-373, registered in the CNPJ/MF under nº 66.444.548/0001-39 // Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

WALGAR S/A PARTICIPACOES (owns 20% of the shares of Árvore S/A EMPREENDIMENTOS E PARTICIPAÇÕES) Brazilian Corporation with its head office at Rua Lapa do Lobo, no. 800, Parte, CEP 38.504-385, Alto Umuarama, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº CNPJ nº 66.444.506/0001-06 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

ELGAR S/A PARTICIPACOES (owns 21% of the shares of Árvore S/A EMPREENDIMENTOS E PARTICIPAÇÕES) Brazilian Corporation with its head office at Rua Lapa do Lobo, no. 800, Parte, CEP 38.504-385, Alto Umuarama, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº CNPJ nº 66.444.563/0001-87 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

LAGAR S/A PARTICIPACOES (owns 59% of the shares of Árvore S/A EMPREENDIMENTOS E PARTICIPAÇÕES) a Brazilian Corporation with its head office at Rua Lapa do Lobo, no. 800, Parte, CEP 38.504-385, Alto Umuarama, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº CNPJ nº 66.444.522/0001-90 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

KÍRON PARTICIPAÇÕES LTDA (owns 50% of the shares of WALGAR S/A PARTICIPAÇÕES) a Brazilian Company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umuarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.018.832/0001-87 // Holding of non-



financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

CATITA PARTICIPAÇÕES LTDA (owns 50% of the shares of WALGAR S/A PARTICIPAÇÕES) a Brazilian company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.011.884/0001-21 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

JV&M PARTICIPAÇÕES LTDA (owns 33% of the shares of ELGAR S.A. PARTICIPAÇÕES) a Brazilian company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.011.848/0001-68 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

LU&BI PARTICIPAÇÕES LTDA (owns 33% of the shares of ELGAR S.A. PARTICIPAÇÕES) a Brazilian company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.011.872/0001-61 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

RHMV PARTICIPAÇÕES LTDA (owns 33% of the shares of ELGAR S.A. PARTICIPAÇÕES), a Brazilian company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.018.872/0001-29 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

LUAR PARTICIPAÇÕES LTDA (owns 50% of the shares of LAGAR S.A. PARTICIPAÇÕES) a Brazilian company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.018.885/0001-06 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

AMAR PARTICIPAÇÕES LTDA (owns 50% of the shares of LAGAR S.A. PARTICIPAÇÕES), a Brazilian company with its head office at Rua Lapa do Lobo, 800, Parte, Alto Umarama, CEP 38405-385, City of Uberlândia, State of Minas Gerais, Brazil, registered in the CNPJ/MF under nº 13.018.818/0001-83 / Holding of non-financial institutions / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

LUIZ ALEXANDRE GARCIA (owns 99,98% of the quotas of LUAR PARTICIPAÇÕES LTDA), Brazilian, businessman, with his office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais, Brazil / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br



ANA MARTA PEREIRA GARCIA (owns 99,98% of the quotas of AMAR PARTICIPAÇÕES LTDA) Brazilian, businesswoman with her office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais, Brazil / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

ELIANE GARCIA MELGAÇO (owns 99,98% of the quotas of JV&M PARTICIPAÇÕES LTDA), Brazilian, businesswoman with her office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais, Brazil / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

ELEUSA MARIA GARCIA MELGAÇO (owns 99,98% of the quotas of LU&BI PARTICIPAÇÕES LTDA), Brazilian, businesswoman with her office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais, Brazil / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

REGINA HELENA MELGAÇO (owns 99,97% of the quotas of RHMV PARTICIPAÇÕES LTDA), Brazilian, businesswoman with her office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

ALEXANDRINO GARCIA NETO (owns 99,97% of the quotas of KIRON PARTICIPAÇÕES LTDA), Brazilian, businessman with his office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

CARMEM SILVIA GARCIA (owns 99,97% of the quotas of CATITA PARTICIPAÇÕES LTDA LTDA), Brazilian, businesswoman with her office at Rua Lapa do Lobo, 800, City of Uberlândia, State of Minas Gerais / Fernanda Aparecida dos Santos, General Legal Counsel, 55 (34) 3218-3025, fernanda.santos@algar.com.br

No other person or entity has 10% or greater direct or indirect voting or equity interest in ALGAR TELECOM S/A.

ALGAR TELECOM S/A does have interlocking directorates with ALGAR CELULAR S/A., a Brazilian mobile carrier:

NAMES OF INTERLOCKING DIRECTORS

Luiz Alberto Garcia

Luiz Alexandre Garcia

Eliane Garcia Melgaço

Ana Marta Pereira Garcia

Eleusa Maria Garcia Melgaço

Alexandrino Garcia Neto



Two handwritten signatures in black ink are located at the bottom right of the page. The first signature is a stylized 'P' and the second is a stylized 'AMP'.

Carmen Sílvia Garcia
Hélio Marcos Machado Graciosa
Walter Fontana Filho
Geraldo Sardinha Pinto Filho
Ozires Silva
Sérgio Alair Barroso
Aguinaldo Diniz Filho
Silvio José Genesini Junior

(2) Information Requested by 47 C.F.R. § 63.18(i):

ALGAR TELECOM S/A is a foreign carrier in Brazil.

ALGAR TELECOM S/A is affiliated with ALGAR CELULAR S/A which is a foreign carrier in Brazil.

(3) Information Requested by 47 C.F.R. § 63.18(j):

ALGAR TELECOM S/A and its affiliate ALGAR CELULAR S/A are foreign carriers in Brazil, where the Monet cable system will land.

(4) Information Requested by 47 C.F.R. § 63.18(k):

Brazil is member of the World Trade Organization.

(5) Information Requested by 47 C.F.R. § 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, ALGAR TELECOM S/A is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.



INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

ALGAR TELECOM S/A accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

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

ALGAR TELECOM S/A is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. This application raises no competition or public interest concerns that would merit consideration outside the Commission's streamlined review process. In Brazil, the only foreign destination market for the Monet cable system, neither ALGAR TELECOM S/A

Two handwritten signatures are located at the bottom right of the page. The first signature is a stylized, cursive mark, and the second is a more legible signature.

nor its affiliate ALGAR CELULAR S/A possess 50 percent market share in the international transport and the local access markets. They therefore pose no risk to the competition on the U.S.-Brazil route and qualify for presumptive non-dominant treatment pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.12(c)(ii). Moreover, neither foreign carrier appears on the Commission's list of foreign carriers presumed to have market power in Brazil.¹

Further, ALGAR TELECOM S/A is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). Florida, the only U.S. state in which the Monet cable system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification under the CZMA.²



¹ See *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, 22 FCC Rcd. 945 (Int'l Bur. 2007).

² See Fla. Revised Statutes 380.23(c)(3); National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Florida's Listed Federal Actions, available at <http://coastalmanagement.noaa.gov/consistency/media/fl.pdf>.

Two handwritten signatures in the bottom right corner of the page.

Certification

I am authorized to enter this certification on behalf of ALGAR TELECOM S/A.

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

By: 

Marcelo de Almeida Nunes
Wholesale Director
Algar Telecom S/A



Cristiene Abadia Evaristo
Regulatory Affairs Coordinator
Algar Telecom S/A

Rua Jose Alves Garcia, 415, Uberlandia,
Minas Gerais, Brazil, 38400-6691
Tel: +5534 32562158
marcelo.nunes@algartelecom.com.br
jeanb@algartelecom.com.br

For and on behalf of ALGAR TELECOM S/A

Dated: February 27th, 2015



APPENDIX B

ANGOLA CABLES S.A.

Angola Cables S.A. (“Angola Cables”) is an investor in and developer of submarine cable systems providing connectivity between Angola and the rest of the world. In addition to its investment in the Monet system, Angola Cables is an investor in the WACS (West Africa Cable System), which connects Angola with 10 other African nations, the Canary Islands, Portugal and the United Kingdom. Angola Cables is also developing the SACS (South Atlantic Cable System) to connect Angola with Brazil. Organized under Angolan law and headquartered in Angola, Angola Cables offers wholesale capacity, voice, and data services to carriers and enterprises. Angola Cables is owned by five Angolan telecommunications companies. Angola Cables has not previously applied for or received any licenses or operating authority from the Commission.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

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

Angola Cables S.A.
Via AL5, Talatona, Lote CellWave
2° floor, Zona XR6B
Luanda, Angola
Telephone: +244 227 360 006

FRN Number: 0024411423

(2) Place of Formation:

Angola Cables is a limited company organized under Angolan law.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Ducécio Fernandes
Head of Legal Department
Angola Cables S.A.
Via AL5, Talatona, Lote CellWave
2° floor, Zona XR6B
Luanda, Angola
Telephone: +244 227 360 006
duccio.fernandes@angolacables.co.ao

With a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W.



A handwritten signature or mark in blue ink, consisting of a vertical line with a small loop at the top and a horizontal stroke at the bottom.

Suite 800
Washington, D.C. 20036-3537
Telephone: +1 202 730 1337
E-mail: kbressie@hwglaw.com

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) Information Requested by 47 C.F.R. § 63.18(h):

Angola Cables has the following 10-percent-or-greater direct or indirect interest holders:

Mercury Serviços de Telecomunicações, S.A.R.L. (“MStelecom”)

Address: Rua Farol da Lagostas, 1-TCC, Bairro São Pedro da Barra, Caixa Postal 3702, 1, Luanda, Angola

Citizenship: Angola

Principal Business: Telecommunications

Relationship: MStelecom directly owns 9 percent of Angola Cables and further holds a 25-percent interest in another Angola Cables shareholder, Unitel S.A., giving it a further 7.75-percent indirect interest in Angola Cables.

Sociedade Nacional de Combustíveis de Angola, E.P. (“Sonangol”)

Address: Rua do 1º Congresso do MPLA, Luanda, Angola

Citizenship: Angola

Principal Business: Energy

Relationship: Sonangol directly owns 100 percent of MStelecom.

Unitel S.A. (“Unitel”)

Address: Edifício Unitel Talatona, Sector Talatona, Via CS3, Luanda Sul, Samba – Angola

Citizenship: Angola

Principal Business: Mobile telecommunications

Relationship: Unitel directly owns 31 percent of Angola Cables.

Angola Telecom E.P. (“Angola Telecom”)

Address: 186, 3º Andar, Rua das Quipacas, Edifício Sede da Angola Telecom 625, Luanda, Angola

Citizenship: Angola

Principal Business: Telecommunications

Relationship: Angola Telecom directly owns 51 percent of Angola Cables and further holds a 20-percent interest in another Angola Cables shareholder, Movitel Telecomunicações S.A., which directly owns 6 percent of Angola Cables, giving Angola Telecom a further 1.2-percent indirect interest in Angola Cables.

Sonangol and Angola Telecom are *empresas públicas* and are wholly owned by the Government of the Republic of Angola.



No other person or entity has 10% or greater direct or indirect voting or equity interest in Angola Cables.

Angola Cables corporate officers or directors that are also officers or directors of other foreign carriers:

Naiole Cristina Cohen dos Santos Guedes

Position with Angola Cables: Chairman of the Board

Position with Angola Telecom: Board Member

João Filipe Melão Dias

Position with Angola Cables: Board Member

Position with Unitel: Chief Financial Officer

Roger Alexandre Quintino dos Santos Ferreira

Position with Angola Cables: Board Member

Position with MSTelcom: Director of Operations

Yolanda Guerreiro

Position with Angola Cables: Member of the Audit Board

Position with Unitel: Head of the planning and control department

(2) Information Requested by 47 C.F.R. § 63.18(i):

Angola Cables is a foreign carrier in Angola and it is affiliated with the foreign carriers identified in Table 1 below:

TABLE 1: FOREIGN AFFILIATES OF ANGOLA CABLES

Affiliated Foreign Carrier	Countries in Which the Affiliated Foreign Carrier Is Authorized to Provide Public Telecommunications Services
Angola Cables Brasil, Ltda.	Brazil
Angola Telecom E.P.	Angola
Infrasat Angola Lda	Angola
Tv Cabo	Angola
Unitel S.A.	Angola
Unitel T+	Cape Verde
Unitel São Tomé e Príncipe SARL	São Tomé and Príncipe

(3) Information Requested by 47 C.F.R. § 63.18(j):

(1) Angola Cables is not a foreign carrier in Brazil, the only foreign destination market in which the Monet cable system will land; (2) it controls a foreign carrier in Brazil; (3) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in Brazil; and (4) no grouping of two or more foreign carriers in Brazil (or parties that control foreign carriers in Brazil) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(4) Information Requested by 47 C.F.R. § 63.18(k):

Brazil, the sole country identified above in response to 47 C.F.R. §§ 1.767(a)(8) and 63.18(j), is a member of the World Trade Organization.

(5) Information Requested by 47 C.F.R. § 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, Angola Cables is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

Angola Cables accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

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

Angola Cables is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. This application raises no competition or public interest concerns that would merit consideration outside the Commission's streamlined review process. In Brazil, the only foreign destination market for the Monet cable system, Angola Cables' affiliate, Angola Cables Brasil, Ltda., is a new market entrant in Brazil, established to:

- a. Provide multimedia communication services;
- b. Construct, operate and maintain fiber optic submarine cable structures and main or complementary ground stations, with cable connection systems and terrestrial telecommunications networks, underwater, national and international;
- c. Construct, operate and maintain network operation centers for the management of multimedia communication services nationally and internationally;
- d. Construct, operate and maintain data processing centers.

Angola Cables Brasil, Ltda. has zero-percent market share in Brazil's international transport and local access markets. It therefore poses no risk to competition on the U.S.-Brazil route and qualifies for presumptive non-dominant treatment pursuant to 47 C.F.R. §§ 63.10(a)(3) and



63.12(c)(ii). Moreover, Angola Cables Brasil, Ltda., does not appear on the Commission's list of foreign carriers presumed to have market power in foreign destination markets.¹

Further, Angola Cables is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). Florida, the only U.S. state in which the Monet cable system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification under the CZMA.²

Certification

I am authorized to enter this certification on behalf of Angola Cables S.A.

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

By: 

António Nunes

CEO

Angola Cables S.A.

Via AL5, Talatona, Lote CellWave,

2° floor, Zona XR6B Luanda, Angola

Tel: +244 227 360 006

antonio.nunes@angolacables.co.ao

For and on behalf of Angola Cables S.A.

Dated: March 11, 2015

¹ See *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, 22 FCC Rcd. 945 (Int'l Bur. 2007).

² See Fla. Revised Statutes 380.23(c)(3); National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Florida's Listed Federal Actions, available at <http://coastalmanagement.noaa.gov/consistency/media/fl.pdf>.

APPENDIX C

ADMINISTRACIÓN NACIONAL DE TELECOMUNICACIONES (“ANTEL”)

ANTEL is the leading telecommunications carrier in Uruguay. It offers fixed and mobile telephony, broadband Internet access, business data communications, national and international long distance services.

ANTEL has not previously applied for or received any licenses or operating authority from the Commission. Antel USA, Inc. is a corporation based in Florida, United States, 100% owned by ANTEL. Antel USA, Inc. has authorization under Section 214 of the Communications Act of 1934 to provide facilities-based services in accordance with Section 63.18(e)(1) of the Commission’s rules and resale services in accordance with Section 63.18(e)(2) of the Commission’s rules, 47 C.F.R §§ 63.18(e)(1) and (2).¹

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

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

Administración Nacional de Telecomunicaciones FRN Number: 0024391187
Guatemala 1075
Montevideo CP 11800 - Uruguay
Telephone: +59829287907

(2) Place of Formation:

ANTEL is a state-owned company organized under the laws of Uruguay.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Javier Emicuri
Sub-Gerente General Gestión Estratégica
Guatemala 1075 piso 21
Montevideo CP 11800 - Uruguay
Telephone: +59829287907
jemicuri@antel.com.uy

With a copy to:

Debbie Rios
RCG Accounting & Associates, Inc.
9000 Sheridan Street, Suite 138
Pembroke Pines, FL 33024

¹ ITC-214-20110228-00051



Telephone: +1 954 862 2222
debbiercg@aol.com

and

Matías Rodríguez
Sub-Gerente General Asesoría Letrada (Legal Counselor)
Guatemala 1075 piso 19
Montevideo CP 11800 - Uruguay
Telephone: +59829286060
mrodriguez@antel.com.uy

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) Information Requested by 47 C.F.R. § 63.18(h):

ANTEL is 100% owned by the state of Uruguay. It does not have any interlocking directorates with foreign carriers.

(2) Information Requested by 47 C.F.R. § 63.18(i):

ANTEL is a foreign carrier in Uruguay.

ANTEL is not affiliated with any foreign carriers.

(3) Information Requested by 47 C.F.R. § 63.18(j):

ANTEL is not a foreign carrier in Brazil and is not affiliated (within the meaning of the Commission's rules) with a foreign carrier in Brazil.

(4) Information Requested by 47 C.F.R. § 63.18(k):

Not applicable.

(5) Information Requested by 47 C.F.R. § 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, ANTEL is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

ANTEL accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).



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

ANTEL is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. ANTEL is not a foreign carrier in Brazil and is not affiliated with a foreign carrier in Brazil.

Further, ANTEL is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). Florida, the only U.S. state in which the Monet cable system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification under the CZMA.²

² See Fla. Revised Statutes 380.23(c)(3); National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Florida's Listed Federal Actions, *available at* <http://coastalmanagement.noaa.gov/consistency/media/fl.pdf>.



Certification

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

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

By:



Ing. Javier Emicuri
Sub Gerente General Gestión Estratégica
ANTEL
Guatemala 1075
Montevideo, Uruguay
Tel: (+598) 29287907
jemicuri@antel.com.uy

**For and on behalf of Administración Nacional de
Telecomunicaciones**

Dated: March 23rd, 2015

APPENDIX D

GU HOLDINGS INC.

GU Holdings Inc. (“GU Holdings”) is an indirect subsidiary of Google Inc. (“Google”). Google's innovative search technologies connect millions of people around the world with information every day. Founded in 1998 by Stanford Ph.D. students Larry Page and Sergey Brin, Google today is a top web property in all major global markets. Google’s targeted advertising program provides businesses of all sizes with measurable results, while enhancing the overall web experience for users. Google is headquartered in Silicon Valley with offices throughout the Americas, Europe, and Asia. For more information, visit www.google.com.

GU Holdings holds a license under the Cable Landing License Act, 47 C.F.R. § 1.767, in connection with the Unity cable system.¹

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(1)-(3)

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

GU Holdings Inc.	FRN Number: 0017777483
1600 Amphitheatre Parkway	
Mountain View, CA 94043	
Telephone: (650) 253-0000	

(2) Place of Formation:

GU Holdings is a corporation organized under the laws of Delaware.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Austin Schlick
Director, GU Holdings Inc.
25 Massachusetts Avenue NW, Ninth Floor
Washington, DC 20001
Telephone: (202) 346-1404
schlick@google.com

With a copy to:

Ulises R. Pin
Morgan, Lewis & Bockius LLP
2020 K Street, NW

¹ File No. SCL-LIC-20080516-00010.

Washington, DC 20006
Telephone: 202-373-6664
u.pin@morganlewis.com

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(8)

(1) Information Requested by 47 C.F.R. § 63.18(h):

GU Holdings is wholly-owned by Google International LLC:

Name: Google International LLC
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Holding company

Google International LLC is wholly-owned by Google Inc.:

Name: Google Inc.
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Technology search services and advertising

As of December 31, 2014, the following persons have a 10% or greater voting or equity interest in Google Inc.:

Name: Larry Page
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 42.6% of Class B common stock (representing 27.6% voting power)
Citizenship: United States
Principal Business: CEO, Co-founder and Director of Google Inc.

Name: Sergey Brin
Address: 1600 Amphitheatre Parkway
Mountain View, CA 94043
Ownership: 41.6% of Class B common stock (representing 27.0% voting power)
Citizenship: United States
Principal Business: Co-founder and Director of Google Inc.

No other person or entity has 10% or greater direct or indirect voting or equity interest in GU Holdings.

GU Holdings does not have any interlocking directorates with foreign carriers.

(2) Information Requested by 47 C.F.R. § 63.18(i):

GU Holdings is not a foreign carrier.

GU Holdings is affiliated with the following foreign carriers:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide public telecommunications services:
Google Singapore Pte Ltd	Singapore
Infraco (Hong Kong) Limited	Hong Kong

(3) Information Requested by 47 C.F.R. § 63.18(j):

GU Holdings is not a foreign carrier in Brazil and is not affiliated (within the meaning of the Commission's rules) with a foreign carrier in Brazil.

(4) Information Requested by 47 C.F.R. § 63.18(k):

Not applicable.

(5) Information Requested by 47 C.F.R. § 63.18(o):

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, GU-Holdings is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

INFORMATION REQUIRED BY 47 C.F.R. § 1.767(a)(9)

GU Holdings accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules, 47 C.F.R. § 1.767(g).

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

GU Holdings is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. GU Holdings is not a foreign carrier in Brazil and is not affiliated with a foreign carrier in Brazil.

Further, GU Holdings is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act of 1972, as amended, 16 U.S.C. § 1456 (the "CZMA"). Florida, the only U.S. state in which the Monet cable system will land, does

not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification under the CZMA.²

² See Fla. Revised Statutes 380.23(c)(3); National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Florida's Listed Federal Actions, *available at* <http://coastalmanagement.noaa.gov/consistency/media/fl.pdf>.

Certification

I am authorized to enter this certification on behalf of GU Holdings Inc.

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

By: 

Austin Schlick

Director

GU Holdings Inc.

1600 Amphitheatre Parkway

Mountain View, CA 94043

Tel: (650) 253-0000

schlick@google.com

For and on behalf of GU Holdings Inc.

Dated: March 24, 2015

APPENDIX E

GEOGRAPHIC OVERVIEW AND CONCEPTUAL SYSTEM CONFIGURATIONS

Figure 1 – Geographic Overview

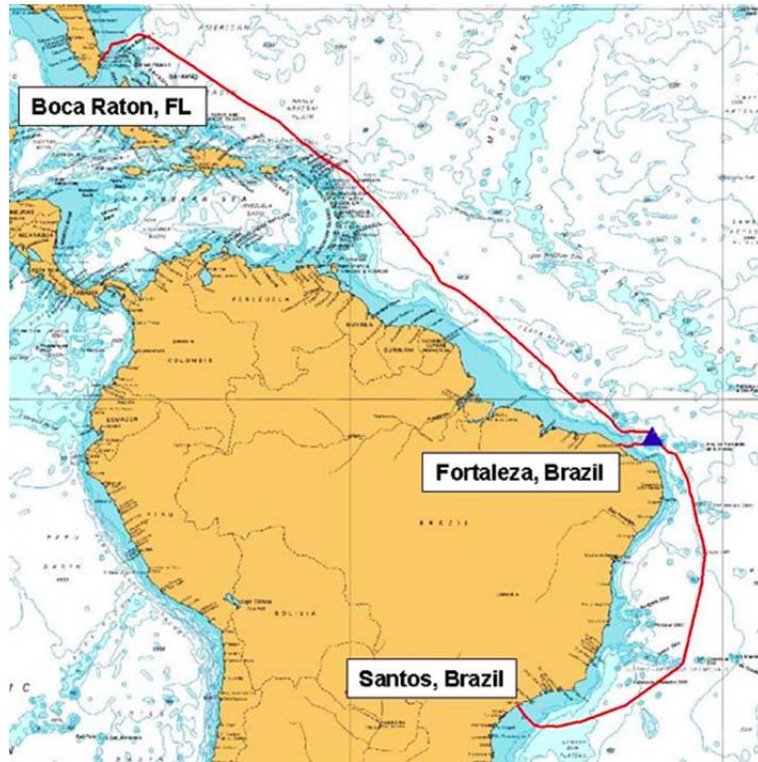
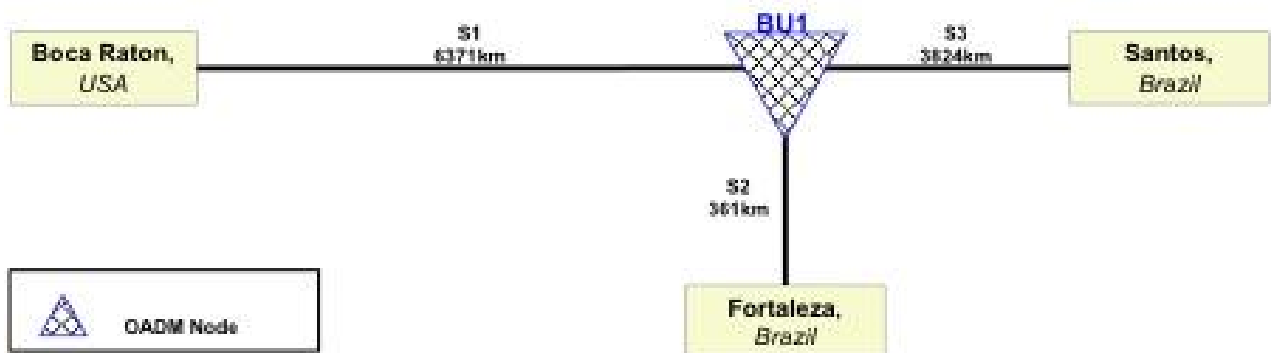


Figure 2 - Segment Configurations



APPENDIX F

IMAGES OF U.S. LANDING

[CONFIDENTIAL - FILED UNDER SEAL]

APPENDIX G

IMAGES OF SANTOS LANDING

[CONFIDENTIAL - FILED UNDER SEAL]

APPENDIX H

IMAGES OF FORTALEZA LANDING

[CONFIDENTIAL - FILED UNDER SEAL]