

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

In the Matter of)
) File No. SCL-LIC-20150408-00008
Algar Telecom S/A, Angola Cables S.A.,)
Administracion Nacional de)
Telecomunicaciones, and GU Holdings Inc.)
)
Application for a License to Land and)
Operate a Private Fiber-Optic Submarine)
Cable System Connecting the U.S. and)
Brazil)

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

The Department of Homeland Security (“DHS”) hereby 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, DHS advises the Commission that DHS has no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the commitment of GU Holdings, Inc. (“GU Holdings”) to abide by the undertakings set forth in the December 6, 2016 Letter of Assurances (“2016 LOA”) provided to DHS, which is attached hereto as Attachment A. The above-referenced proceedings involve applications seeking Commission to land and operate a fiber optic submarine cable system connecting the United States and Brazil.

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

¹ 47 C.F.R. § 1.41.

(2001).

After discussions with representatives of GU Holdings in connection with the above-referenced proceedings, DHS has concluded that the commitments set forth in the 2016 LOA will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, DHS advises the Commission that it has no objection to the Commission granting the applications in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by GU Holdings with the 2016 LOA.

Respectfully submitted,

/S/ Shawn Cooley
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December 8, 2016

Attachment A (2016 Letter of Assurances)