

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

In the Matter of)	
)	
GU HOLDINGS INC., CHINA MOBILE)	
INTERNATIONAL LIMITED, CHINA)	
TELECOM GLOBAL LIMITED, GLOBAL)	
TRANSIT 2 LIMITED, KDDI CORPORATION,)	File No. SCL-LIC-2015-_____
and SINGAPORE TELECOM USA INC.)	
)	
Application for a License to Construct, Land,)	
and Operate an Undersea Fiber Optic Cable)	
Connecting the U.S., Japan, and Taiwan)	

APPLICATION FOR A CABLE LANDING LICENSE
STREAMLINED PROCESSING REQUESTED

GU Holdings Inc. (“GU Holdings”),¹ China Mobile International Limited (“CMI”), China Telecom Global Limited (“CTG”), Global Transit 2 Limited (“GT2L”), KDDI Corporation (“KDDI”), and Singapore Telecom USA Inc. (“Singtel USA”)² (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 land and operate a non-common carrier fiber-optic submarine telecommunications cable extending between the U.S., Japan, and Taiwan. This submarine cable system will be called the FASTER Cable System (“FASTER”).

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”).

² Singtel USA is the U.S. operating subsidiary of Singapore Telecommunications Limited (“Singtel”).

I. DESCRIPTION OF THE CABLE SYSTEM

A. General Description

Construction of FASTER is scheduled to begin immediately, and the target for making capacity available is the second quarter of 2016.

FASTER will land in four locations: Bandon, Oregon, Chikura, Japan, Shima, Japan, and Tanshui, Taiwan.³ The system will have six segments: Segment 1 from Bandon to the first branching unit (“BU1”); Segment 2 from Chikura to BU1; Segment 3 from BU1 to a second branching unit (“BU2”); Segment 4 from Shima to BU2; and Segments 5 and 6 from Tanshui to BU2. The principal portion of FASTER (the “Basic Infrastructure”), composed of Segments 1 through 4, will have six fiber pairs with a total initial design capacity of 60 Terabits per second (“Tbps”). Segments 5 and 6 (the “Extension Infrastructure”) will have 2 fiber pairs with a total initial design capacity of 20 Tbps. The entire system will have a total length of 11,629 kilometers and an expected useful life of 25 years.

A geographic overview and conceptual segment configuration are provided in Appendix A.

B. Construction and Operation of FASTER

FASTER will be owned, operated, and maintained pursuant to a Joint Build Agreement (“JBA”) between CMI, CTG, GT2L, KDDI, Singtel, and Google Cable Bermuda Ltd. (“GCB”).⁴ Ownership interests are set forth in Section IV.D. below, and details regarding each of the Applicants are provided in Appendices B through G. A Management Committee, composed of one representative named by each of the Parties, will manage FASTER’s common

³ An application for approval to land FASTER in Taiwan is currently pending before Taiwanese authorities. GU Holdings will promptly advise the Commission if approval is obtained.

⁴ GCB is an indirect, wholly-owned subsidiary of Google organized under the laws of Bermuda, and owns all of Google’s capacity in FASTER outside of the U.S.

infrastructure.⁵ The Management Committee is responsible for directing the engineering, construction, operation, and maintenance of FASTER. Decisions of the Management Committee will be by consensus or a simple majority, except for certain major actions that require a super-majority or unanimity. The Management Committee may appoint working groups to carry out its responsibilities.

The parties to the JBA have entered into a Supply Contract with NEC Corporation and NEC Corporation of America (together, “NEC”) for the construction of FASTER, including the subsea plant and certain terrestrial transmission facilities associated with the system. NEC has overall design responsibility and will supply the dry plant equipment.

All Parties have the ability to activate the Oregon-Chikura and Oregon-Shima routes. As the sole investor in the Extension Infrastructure, GCB will also have the ability to activate the Oregon-Tanshui, Tanshui-Shima, and Tanshui-Chikura routes.

GU Holdings is the landing party for FASTER in the U.S. and KDDI is the landing party for both Japan landings. A United States Landing Party Agreement and a Japan Landing Party Agreement will govern the relationship between the landing party and the other Parties at these landings. At each landing station, individual Parties may connect their capacity to the domestic network or other international cable systems.

GCB has contracted with New Century InfoComm Tech Co., LTD (“NCIC”), a non-dominant telecommunications operator in Taiwan, to be the landing party in Taiwan. A Taiwan Landing Party Agreement governs the relationship between GCB and NCIC and provides that, upon completion, GCB shall convey to NCIC ownership of the portion of FASTER that extends

⁵ The Parties will jointly own FASTER’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.

12 nautical miles from the shores of Taiwan. NCIC shall then grant GCB an indefeasible right of use (“IRU”) for that same portion of FASTER.

The primary Network Operations Center (“NOC”) for FASTER 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 FASTER, including the landing and terminal equipment, terrestrial transmission facilities associated with the U.S. landing, as well as the U.S. NOC. 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 FASTER’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, FASTER will (i) help connect U.S. Internet users and businesses to Asia, the world’s biggest Internet market; (ii) increase competition on the trans-Pacific route, and (iii) enhance the service quality, redundancy, and resilience of communications systems in the region.

A. FASTER Will Better Connect the U.S. to the World’s Biggest Internet Market

Asia is already “the main contributor to the world’s Internet population; 42% of the world’s Internet users live in Asia, and China, India, and Japan alone host more Internet users

than Europe and North America combined.”⁶ Yet there is still room for substantial growth in the Asian market, as Internet penetration rates generally lag far behind population growth, especially in China.⁷ With landings in Japan and Taiwan, FASTER will help connect U.S. Internet users and U.S. businesses to this strong and growing market for years to come.

B. FASTER Will Increase Competition on the Trans-Pacific Route

Additional capacity on the trans-Pacific route will also 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.”⁸ FASTER serves that objective. With the largest design capacity of any cable on the trans-Pacific route, FASTER will immediately and significantly increase regional capacity upon deployment. This may result in lower bandwidth prices, which in turn would spur greater service innovation and lower prices for consumers of international communications services.

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

The substantial increase in capacity that will result from FASTER’s deployment will improve service for voice and high-bandwidth applications such as video. Whereas the age and length of existing submarine cables between the U.S. and Asia make upgrading that

⁶ *Information Geographies at the Oxford Internet Institute: Internet Population and Penetration*, available at <http://geography.oii.ox.ac.uk/> (last visited Mar. 18, 2015).

⁷ *Id.*

⁸ *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”).

infrastructure a challenge,⁹ FASTER will provide state-of-the-art technology. In addition, by interconnecting with other submarine and terrestrial systems serving the region, FASTER will reduce congestion on those networks and enable carriers and service providers to expand their dynamic routing.

FASTER also will improve the redundancy and resiliency of the communications network in the region. FASTER will interconnect, directly or indirectly, with many of the existing and 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 FASTER as an alternative and diverse transmission route between the U.S. and Asia.

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 B: GU Holdings

Appendix C: CMI

Appendix D: CTG

Appendix E: GT2L

Appendix F: KDDI

Appendix G: Singtel USA

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

⁹ *Submarine Telecoms Industry Report 2014*, available at <http://www.terabitconsulting.com/downloads/2014-submarine-cable-market-industry-report.pdf>. (“SubTel Report”).

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

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

As described above, FASTER will land in four locations: Bandon, Oregon, Chikura, Japan, Shima, Japan, and Tanshui, Taiwan.

Bandon, Oregon

The Bandon cable landing station in the US is located at:

Street Address: 96614 Wickizer Way
Bandon, OR 97411

Coordinates: Latitude 43°14'51.6408"N
Longitude 124°23'02.1012"W

The beach manhole is located at:

Coordinates: Latitude 43°14'53.8332"N
Longitude 124°23'10.2660"W

Chikura, Japan

The Chikura cable landing station in Japan is located at:

Street Address: 994-1 Kitaasi Chikura-cho
Minamiboso-shi, Chiba, 295-0011 Japan

Coordinates: Latitude 34°58'26.4540"N
Longitude 139°57'11.7576"E

The beach manhole is located at:

Coordinates: Latitude 34°58'18.90"N
Longitude 139°57'38.10"E

Shima, Japan¹⁰

The Shima cable landing station in Japan is located at:

Street Address: 2330-1 Kohka, Ago-cho

¹⁰ The Parties are currently negotiating an agreement for a second cable landing station at Shima. If an agreement is reached, a portion of Segment 4 will extend via terrestrial fibers from the first Shima station described here to the second Shima station. GU Holdings will promptly advise the Commission if an agreement is reached.

(TPE) Asia-America Gateway (AAG), and Unity.¹³ Systems called New Cross Pacific (NCP), Pacific Cloud Xchange (PCX), and SEA-US also are expected to be licensed and ready for service within the next few years.¹⁴ Thus, while FASTER will substantially improve connectivity between the U.S. and Asia, there are alternative facilities on the trans-Pacific route 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 FASTER 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 FASTER.

For these reasons, the Commission should find that FASTER 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 FASTER in proportionate and indivisible shares according to the following percentage ownership interests:

Basic Infrastructure (Segments 1–4):

Party	Participation Interest	Voting Rights	Fiber Pairs
CMI	16.667%	16.667%	1.0

¹³ See SubTel Report at Section 5.2.1.

¹⁴ *Id.*

CTG	16.667%	16.667%	1.0
GT2L	16.667%	16.667%	1.0
GCB ¹⁵	16.667%	16.667%	1.0
KDDI	16.667%	16.667%	1.0
Singtel	16.667%	16.667%	1.0

Extension Infrastructure (Segments 5 & 6):

Party	Participation Interest	Voting Rights	Fiber Pairs
GCB ¹⁶	100%	100%	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 B through G 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 B through G.

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 B through G.

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

¹⁶ As described above, NCIC will own the portion of FASTER that extends 12 miles from the shores of Taiwan and NCIC will grant an IRU to GCB for that portion.

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

As described in Appendices B through G, 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

For the reasons set forth above, 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., Japan, and Taiwan. Applicants respectfully request that the Commission grant this application on a streamlined basis.

Respectfully submitted,

/s/ Ulises R. Pin

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Counsel for GU Holdings Inc.

Dated: June 26, 2015

APPENDICES

Appendix A: Geographic Overview and Conceptual System Configuration

Appendix B: GU Holdings Inc.

Appendix C: China Mobile International Limited

Appendix D: China Telecom Global Limited

Appendix E: Global Transit 2 Limited

Appendix F: KDDI Corporation

Appendix G: Singapore Telecom USA Inc.

Appendix H: Maps and Photos of U.S. Landing

Appendix I: Maps and Photos of Japan Landings

Appendix J: Maps and Photos of Taiwan 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 Wood

Denise Wood
June 26, 2015

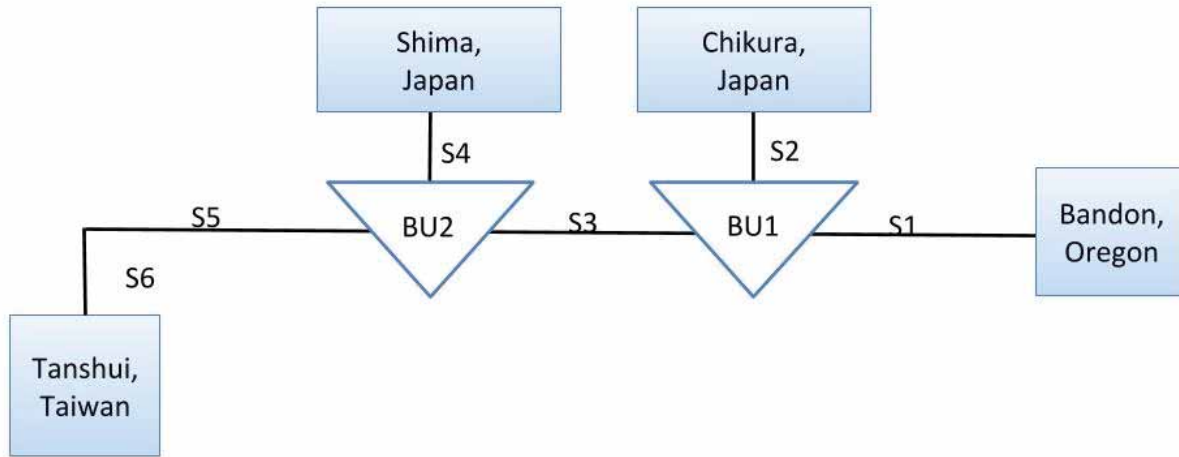
APPENDIX A

GEOGRAPHIC OVERVIEW AND CONCEPTUAL SEGMENT CONFIGURATION

Figure 1 – Geographic Overview



Figure 2 - Conceptual Segment Configuration



APPENDIX B

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:

¹ File No. SCL-LIC-20080516-00010. GU Holdings also has also applied for a cable landing license in connection with the Monet cable system. See File No. SCL-LIC-20150408-00008.

Ulises R. Pin
William W. Wilhelm, Jr.
Morgan, Lewis & Bockius LLP
2020 K Street, NW
Washington, DC 20006
Telephone: 202-373-6664
u.pin@morganlewis.com
william.wilhelm@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: 42.4% of Class B common stock (representing 27.4% 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: 41.7% of Class B common stock (representing 26.9% 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 Japan or Taiwan and is not affiliated (within the meaning of the Commission's rules) with a foreign carrier in Japan or Taiwan.

(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)(1) of the Commission's rules. GU Holdings is not a foreign carrier in Japan or Taiwan and is not affiliated with a foreign carrier in Japan or Taiwan.

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"). Oregon, the only U.S. state in which the FASTER 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 Oregon Admin. Rules 660-035-0015; Oregon Coastal Management Program, Reviewed Federal Licenses and Permits, www.oregon.gov/LCD/OCMP/pages/fedcon_fedperms.aspx; National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Oregon's Listed Federal Actions, *available at* <http://coastalmanagement.noaa.gov/consistency/media/or.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 B 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: June 19 2015

E-mail: kbressie@hwglaw.com
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E-mail: karenlau@cmi.chinamobile.com

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

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

CMI has the following 10-percent-or-greater direct or indirect shareholders:

China Mobile International Holdings Limited (“CMIHL”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong
Citizenship: Hong Kong SAR
Principal Business: Investment holding company
Relationship: CMIHL owns 100 percent of CMI

China Mobile Limited (“CML”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong
Citizenship: Hong Kong
Principal Business: Telecommunications
Relationship: CML owns 100 percent of CMIHL.

China Mobile Hong Kong (BVI) Limited (“CMHK-BVI”)

Address: P.O. Box 957, Offshore Incorporations Center, Road Town, Tortola, British Virgin Islands
Citizenship: British Virgin Islands
Principal Business: Investment holding company
Relationship: CMHK-BVI owns 74.20 percent of CML.

China Mobile (Hong Kong) Group Limited (“CMHKG”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong
Citizenship: Hong Kong SAR
Principal Business: Investment holding company
Relationship: CMHKG owns 100 percent of CMHK-BVI.

China Mobile Communications Corporation (“CMCC”)

Address: 29 Jin Rong Avenue, Xicheng District, Beijing 100032, People’s Republic of China
Citizenship: People’s Republic of China
Principal Business: Investment holding company

Relationship: CMCC owns 100 percent of CMHKG.

CMCC is a state-owned enterprise subject to the supervision of the State-Owned Assets Supervision and Administration Commission (“SASAC”) of the State Council of the People’s Republic of China. SASAC is a government entity located at No. 26, Xidajie, Xuanwumen, Xicheng District, Beijing 100053, People’s Republic of China. The PRC Government owns 100 percent of CMCC.

List of CMI Interlocking Directorates with Foreign Carriers

Foreign Affiliates of CMI	Directors of CMI						
	Fan Yunjun	Shen Weizhong	Lei Liqun	Bian Yannan	Huang Ying	Nie Yutian	Zhang Jun
China Mobile Hong Kong Company Limited	X			X	X	X	X
China Mobile International (UK) Limited	X		X				
China Mobile International (Singapore) Pte. Ltd.	X		X				
China Mobile International KK		X	X				
China Mobile International (Germany) GmbH		X	X				
China Mobile Pakistan Ltd d/b/a Zong				X	X	X	X

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

CMI is a foreign carrier in Hong Kong and is affiliated with the foreign carriers identified in Table 1 below:

TABLE 1: FOREIGN AFFILIATES OF CMI

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
China Mobile Communication Company Limited	China
China Mobile Group Anhui Company Limited	China
China Mobile Group Beijing Company Limited	China
China Mobile Group Chongqing Company Limited	China
China Mobile Group Fujian Company Limited	China
China Mobile Group Gansu Company Limited	China
China Mobile Group Guangdong Company Limited	China
China Mobile Group Guangxi Company Limited	China
China Mobile Group Guizhou Company Limited	China

China Mobile Group Hainan Company Limited	China
China Mobile Group Hebei Company Limited	China
China Mobile Group Heilongjiang Company Limited	China
China Mobile Group Henan Company Limited	China
China Mobile Group Hubei Company Limited	China
China Mobile Group Hunan Company Limited	China
China Mobile Group Jiangsu Company Limited	China
China Mobile Group Jiangxi Company Limited	China
China Mobile Group Jilin Company Limited	China
China Mobile Group Liaoning Company Limited	China
China Mobile Group Neimenggu Company Limited	China
China Mobile Group Ningxia Company Limited	China
China Mobile Group Qinghai Company Limited	China
China Mobile Group Shaanxi Company Limited	China
China Mobile Group Shandong Company Limited	China
China Mobile Group Shanghai Company Limited	China
China Mobile Group Shanxi Company Limited	China
China Mobile Group Sichuan Company Limited	China
China Mobile Group Tianjin Company Limited	China
China Mobile Group Xinjiang Company Limited	China
China Mobile Group Xizang Company Limited	China
China Mobile Group Yunnan Company Limited	China
China Mobile Group Zhejiang Company Limited	China
China Mobile Hong Kong Company Limited	Hong Kong
China Mobile International (UK) Limited	United Kingdom
China Mobile International (Singapore) Pte. Ltd.	Singapore
China Mobile International KK ("CMI Japan")	Japan
China Mobile International (Germany) GmbH	Germany
China Mobile Pakistan Ltd d/b/a Zong	Pakistan

CMI Japan does not own or control a cable station in Japan.

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

(1) CMI is not a foreign carrier in Japan or Taiwan; (2) CMI controls a foreign carrier in Japan, CMI Japan; (3) other than CMI Japan, no entity owning more than 25 percent of CMI or controlling it controls a foreign carrier in Japan or Taiwan; and (4) no grouping of two or more foreign carriers in Japan or Taiwan (or parties that control foreign carriers in Japan or Taiwan) 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):

Japan and Taiwan (listed as Chinese Taipei) are members of the World Trade Organization.²

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

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, CMI 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)

CMI 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)

CMI requests streamlined processing pursuant to 47 C.F.R. §§ 1.767(k)(1) and 1.767(k)(2). This application raises no competition or public interest concerns that would merit consideration outside the Commission's streamlined review process. In Japan, CMI Japan is a new market entrant in Japan, established to provide international voice, data, mobile, and value-added services. It has zero-percent market share in Japan's international transport and local access markets. It therefore poses no risk to competition on the U.S.-Japan route and qualifies for presumptive non-dominant treatment pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.12(c)(ii).

With respect to Taiwan, CMI is not affiliated with a Taiwanese carrier.

Further, CMI 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"). Oregon, the only U.S. state in which the FASTER 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.³

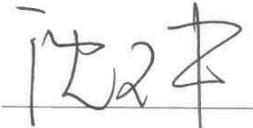
² See List of WTO Members and Observers (as of June 26, 2014), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

³ See Oregon Admin. Rules 660-035-0015; Oregon Coastal Management Program, Reviewed Federal Licenses and Permits, www.oregon.gov/LCD/OCMP/pages/fedcon_fedperms.aspx; National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Oregon's Listed Federal Actions, available at <http://coastalmanagement.noaa.gov/consistency/media/or.pdf>.

Certification

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

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

By: 

Shen Wei Zhong
Director & Executive Vice President, Chief Operating
Officer
China Mobile International Limited
Level 30, Tower 1, Kowloon Commerce Centre,
No. 51 Kwai Cheong Road
Kwai Chung, New Territories, Hong Kong
Telephone: +852 39756678
Fax: +852 3188 0661
E-mail: shenweizhong@cmi.chinamobile.com

**For and on behalf of
China Mobile International Limited**

Dated: June 25, 2015

APPENDIX D

CHINA TELECOM GLOBAL LIMITED

China Telecom Global Limited (“CTG”) is the wholly owned international business subsidiary of China Telecom Corporation Limited (“China Telecom”), one of the world’s largest providers of integrated telecommunication services. Headquartered in Hong Kong and leveraging China Telecom’s tremendous resources within mainland China, CTG’s global network platform spans Asia, the Americas and the Europe, Middle East, Africa (EMEA) region, offering world-class integrated communication services to multinational businesses, telecommunication service providers and overseas Chinese consumers around the world. CTG currently has subsidiaries and offices in 26 countries and regions around the world. Additional information regarding CTG is available at <http://www.chinatelecomglobal.com/>

CTG affiliate, China Telecom (Americas) Corporation, holds authority from the Commission pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the Commission’s rules, 47 C.F.R. § 63.18(e)(1), and also to provide service in accordance with the provisions of Section 63.18(e)(2) of the Commission’s rules, 47 C.F.R. § 63.18(e)(2), between the U.S. and China.¹

In December 2006, China Telecommunications Corporation, together with China Network Communications Group Corporation, China United Telecommunications Corporation, Chunghwa Telecom Co., Ltd., KT Corporation and MCI International, Inc. (“Verizon Business”), signed the Construction and Maintenance Agreement and constructed the Trans Pacific Express (“TPE”) submarine cable. Verizon Business, on behalf of all TPE members, applied FCC license and acquired it on January 11, 2008.²

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

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

China Telecom Global Limited FRN Number: 0024499246
38/F Dah Sing Financial Center,
108 Gloucester Road, Wanchai, Hong Kong
Tel: 852 2877 9777

(2) Place of Formation:

CTG is incorporated under the laws of Hong Kong S. A. R.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

¹ File No. ITC-214-20020716-00371.

² File No. SCL-LIC-20070222-00002.

Name: Li Yongyi
Title: Senior Manager
Address: No. 19, Chaoyangmen Beidajie,
Dongcheng District, Beijing, 100010, P. R. China
Tel: +86 10 59501086
Email: liyy@chinatelecomglobal.com

With a copy to:

Name: Liang Xiaohong
Title: Senior Manager
Address: suite 1800, 624 S Grand Ave. Los Angeles, CA 90017, USA
Tel:
Email: liangxh@chinatelecomglobal.com

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

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

The following entities have a 10% or greater ownership interest in the CTG:

Name : China Telecom Corporation Limited
Address: 31 Jinrong Street, Xicheng District, Beijing, 100033, China
Ownership: China Telecom Global Limited is 100% owned by China Telecom Corporation Limited.
Principal Business: Telecommunication services

Name: China Telecommunications Corporation
Address: 31 Jinrong Street, Xicheng District, Beijing, 100033, China
Ownership: China Telecom Corporation Limited is 70.89% owned by China Telecommunications Corporation.
Principal Business: Telecommunications services

China Telecommunications Corporation is a state-owned enterprise supervised by the State-owned Assets Supervision and Administration Commission of the State Council (“SASAC”), of the People’s Republic of China (“PRC”). The PRC government owns 100% of China Telecommunications Corporation.

China Telecommunications Corporation (“China Telecom Corp”) has two holding companies, namely, “China Telecom Corporation Limited” and “China Communications Services Corporation Limited”. China Telecommunications Corporation is running its primary businesses and secondary businesses in a dual share structure. China Telecom Corporation Limited (Stock Code: HK.00728, NYSE.CHA) went public in Hong Kong and New York in 2002, whilst China Communications Services Corporation Limited (Stock Code: HK.00552) launched its IPO in Hong Kong in 2006.

CTG has interlocking directorates with foreign carriers as listed below.

Director	Company	Jurisdiction
Sun Kangmin	China Telecom Global Limited	Hong Kong, Japan
	China Telecom Corporation Limited	PRC
Zhang Xin	China Telecom Global Limited	Hong Kong, Japan
Tang Ke	China Telecom Global Limited	Hong Kong, Japan
Han Zhencong	China Telecom Global Limited	Hong Kong, Japan
Sun Xiaohong	China Telecom Global Limited	Hong Kong, Japan
Deng Xiaofeng	China Telecom Global Limited	Hong Kong, Japan
	China Telecom (Singapore) Pte. Ltd	Singapore
	China Telecom (Australia) Pty Ltd	Australia
Tan Yijun	China Telecom Global Limited	Hong Kong, Japan
Ou Yan	China Telecom (Germany) Ltd	Germany
	Limited Liability Company "China Telecom" (Moscow)	Russia
	China Telecom Global Limited	Hong Kong, Japan

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

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide public telecommunications services:
China Telecom Global Limited	Hong Kong, Japan
China Telecom (Singapore) Pte. Ltd	Singapore
China Telecom (Australia) Pty Ltd	Australia
Limited Liability Company "China Telecom" (Moscow)	Russia

China Telecom (Germany) Ltd	Germany
China Telecommunications Corporation	PRC
China Telecom Corporation Limited	PRC

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

CTG Japan branch is a licensed carrier in Japan.

CTG is not affiliated with a foreign carrier in Taiwan.

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

Japan and Taiwan are members 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, CTG 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)

CTG 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).

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

CTG is eligible for streamlined processing under Sections 1.767 (k)(1) and 1.767 (k)(2) of the Commission’s rules. Although CTG Japan branch is a foreign carrier in Japan, it is a competitive entrant and lacks sufficient market power in Japan. It therefore poses no risk to competition on the U.S.-Japan route and qualifies for presumptive non-dominant treatment pursuant to 47 C.F.R. §§ 63.10(a)(3) and 63.12(c)(ii).

With respect to Taiwan, CTG is not affiliated with a Taiwanese carrier.

Further, CTG 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”). Oregon, the only U.S. state in which the FASTER 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.³

³ See Oregon Admin. Rules 660-035-0015; Oregon Coastal Management Program, Reviewed Federal Licenses and Permits, www.oregon.gov/LCD/OCMP/pages/fedcon_fedperms.aspx; National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Oregon’s Listed Federal Actions, *available at* <http://coastalmanagement.noaa.gov/consistency/media/or.pdf>.

Certification

I am authorized to enter this certification on behalf of China Telecom Global Limited.

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

By: 

Yu Bing
Vice President
China Telecom Global Limited
38/F, Dah Sing Financial Center,
108 Gloucester Road, Wanchai,
Hong Kong
Tel: +852 2877 9777
Fax: +852 2877 0988

For and on behalf of China Telecom Global Limited

Dated: June 19, 2015

APPENDIX E

GLOBAL TRANSIT 2 LIMITED

Global Transit 2 Limited (“GT2L”) is incorporated in Malaysia and is a subsidiary of TIME dotCom Berhad. GT2L does not hold any FCC licenses. However, GT2L’s affiliate, Global Transit Limited, a company incorporated in Malaysia and a wholly owned subsidiary of TIME dotCom Berhad holds an FCC license with regards to the Unity Cable System which was built in 2008 and lands near Los Angeles, California.

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

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

Global Transit 2 Limited (GT2L) Lot A020, Level 1, Podium Level Financial Park, Jalan Merdeka 87000 Labuan, Federal Territory Malaysia Tel: +6087 431055	FRN Number: 0024523003
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(2) Place of Formation:

GT2L is a Limited By Shares Company organized under the laws of Malaysia.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Christopher Stuart Parker Wilson
Director
Global Transit 2 Limited
Level 10, Menara AIMS
Changkat Raja Chulan
50200 Kuala Lumpur
Malaysia
Tel: +603-2727 8400
Fax: +603-2020 1880
Email: chris.wilson@time.com.my

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

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

The following persons or entities hold 10% or greater ownership interest in GT2L:

Name:	TIME dotCom Berhad (“TIME”)
Address:	No. 14, Jalan Majistret U1/26 Hicom Glenmarie Industrial Park

40150 Shah Alam
Selangor Darul Ehsan, Malaysia
Ownership: 100%
Country: Malaysia
Principal Business: Investment holding, provision of management and marketing / promotional services

The following persons or entities hold 10% or greater ownership interest in TIME:

Name: Pulau Kapas Ventures Sdn Bhd (“PKV”)
Address: Level 6 to 18, Menara AIMS (formerly known as Menara Aik Hua)
Changkat Raja Chulan
50200 Kuala Lumpur, Malaysia
Ownership: 31.50% in TIME
Country: Malaysia
Principal Business: Investment holding

Name: Khazanah Nasional Berhad (“Khazanah”)
Address: Level 33 Tower 2, Petronas Twin Towers
Kuala Lumpur City Centre
50088 Kuala Lumpur, Malaysia
Ownership: 11.38% in TIME
Country: Malaysia
Principal Business: Investment

Save and except for one share owned by the Federal Land Commissioner, all of the equity of Khazanah is owned by Minister of Finance (Incorporated), which is in turn owned by the Ministry of Finance. In essence, Khazanah is a wholly owned entity of the Malaysian Government.

Khazanah is the investment holding fund of the Malaysian Government where Khazanah are empowered as the Malaysian Government’s strategic investor. As trustee to the nation’s financial assets, Khazanah’s main objective is to promote economic growth and make strategic investments on behalf of the Malaysian Government which would contribute towards nation building in the long run.

The following persons or entities hold 10% or greater ownership interest in PKV:

Name: Global Transit International Sdn Bhd (“GTISB”)
Address: 18th Floor, Menara AIMS (formerly known as Menara Aik Hua)
Changkat Raja Chulan
50200 Kuala Lumpur, Malaysia
Ownership: 70% of PKV
Country: Malaysia
Principal Business: Investment holding company and providing management services

Name: Khazanah
Address: Please see above
Ownership: 30% of PKV
Country: Please see above
Principal Business: Please see above

The following persons or entities hold 10% of greater ownership interest in GTISB:

Name: Megawisra Sdn Bhd (“MSB”)
Address: 18th Floor, Menara AIMS (formerly known as Menara Aik Hua)
Changkat Raja Chulan
50200 Kuala Lumpur, Malaysia
Ownership: 100% of GTISB
Citizenship: Malaysia
Principal Business: Investment holding company

The following persons or entities hold 10% or greater ownership interest in MSB:

Name: Megawisra Investment Limited (“MIL”)
Address: Akara Building, 24 De Castro Street
Wickhams Clay I
Road Town, Tortola, British Virgin Islands
Ownership: 100% of MSB
Citizenship: British Virgin Islands
Principal Business: Investment holdings

The following persons or entities hold 10 % or greater ownership interest in MIL:

Name: Afzal Abdul Rahim
Address: 27, Jalan Cinta Alam
Country Heights
43000 Kajang, Selangor Darul Ehsan, Malaysia
Ownership: 75% in MIL
Citizenship: Malaysia
Occupation: Chief Executive Officer

Name: Gan Te-Shen
Address: No. 29, Jalan Taman Seputeh 2
Taman Seputeh
58000 Kuala Lumpur, Malaysia
Ownership: 25% in MIL
Citizenship: Malaysia
Occupation: Director

No other person or entity holds a 10% or greater direct or indirect interest in GT2L.

The following persons are interlocking directors of the companies listed below:

Director / Officer	Company	Jurisdiction	Position
Afzal Bin Abdul Rahim	TT dotCom Sdn Bhd	Malaysia	Director
	TIME DotNet Berhad	Malaysia	Director
	Planet Tapir Sdn Bhd	Malaysia	Director
	Fantastic Fiesta Sdn Bhd	Malaysia	Director
	Global Transit 2 Limited	Malaysia	Director
	Global Transit 3 Limited	Malaysia	Director
	Global Transit 5 Limited	Malaysia	Director
Saiful Husni Bin Samak	Global Transit Communications Sdn Bhd	Malaysia	Director and Chief Executive Officer
	Global Transit Limited	Malaysia	Director
	Global Transit Singapore Pte. Ltd.	Singapore	Director
	Global Transit (Hong Kong) Limited	Hong Kong	Director
	Global Transit 2 Limited	Malaysia	Director
	Global Transit 3 Limited	Malaysia	Director
	Global Transit 5 Limited	Malaysia	Director
Christopher Stuart Parker Wilson	Global Transit Singapore Pte. Ltd.	Singapore	Director
	Global Transit 2 Limited	Malaysia	Director
	Global Transit 3 Limited	Malaysia	Director
	Global Transit 5 Limited	Malaysia	Director

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

GT2L is a foreign carrier in Malaysia.
GT2L is affiliated with the following foreign carriers:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide public telecommunications services:
AIMS Data Centre 2 Sdn Bhd	Malaysia
AIMS Cyberjaya Sdn Bhd	Malaysia
AIMS Data Centre Sdn Bhd	Malaysia
The AIMS Asia Group Sdn Bhd	Malaysia
AIMS Data Centre Pte. Ltd.	Singapore

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

GT2L is not a foreign carrier in Japan or Taiwan and is not affiliated (within the meaning of the Commission's rules) with a foreign carrier in Japan or Taiwan.

(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, GT2L 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)

GT2L 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).

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

GT2L is eligible for streamlined processing under Section 1.767(k)(1) of the Commission's rules. GT2L is not a foreign carrier in Japan or Taiwan and is not affiliated with a foreign carrier in Japan or Taiwan.

Further, GT2L 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"). Oregon, the only U.S. state in which the FASTER 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.¹

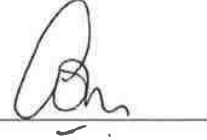
¹ See Oregon Admin. Rules 660-035-0015; Oregon Coastal Management Program, Reviewed Federal Licenses and Permits, www.oregon.gov/LCD/OCMP/pages/fedcon_fedperms.aspx; National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Oregon's Listed Federal Actions, *available at* <http://coastalmanagement.noaa.gov/consistency/media/or.pdf>.

Certification

I am authorized to enter this certification on behalf of Global Transit 2 Limited.

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

By:



Christopher Stuart Parker Wilson
Director
Global Transit 2 Limited
Level 10, Menara AIMS
Changkat Raja Chulan
50200 Kuala Lumpur
Malaysia
Tel: +603-2727 8400
Fax: +603-2020 1880

**For and on behalf of Global Transit 2
Limited**

Dated: June 19, 2015

APPENDIX F

KDDI CORPORATION

With more than 40 million subscribers, KDDI Corporation (“KDDI”) is Japan's second-largest mobile operator. Furthermore, together with its subsidiaries, KDDI is one of the largest Japanese ICT solution company that provide comprehensive services for consumers and corporate clients. With services from fixed to mobile communications and solutions, "TELEHOUSE" data centers and broadcasting, KDDI aims to be a company that creates new styles for customer's lives and corporate activities from local communities to overseas with communication as its base. For more information, please visit:
www.kddi.com/english/index.html.

KDDI does not hold any licenses issued by the Commission; however, its subsidiaries KDDI America, Inc., KDDI Global LLC and Telehouse International Corporation of America hold authority pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as global facilities-based and resale carriers in accordance with Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules, 47 C.F.R. §§ 63.18(e)(1) and 63.18(e)(2).¹

KDDI participates in other submarine cable systems which land in the U.S.A. including China-US Cable Network, Japan-US Cable Network and Unity Cable System.

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

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

KDDI Corporation
3-10-10, Iidabashi, Chiyoda-ku,
Tokyo 102-8460 Japan
Tel: +81 (3) 3347 0077

FRN Number: 00146 43209

(2) Place of Formation:

KDDI is formed under the laws of Japan.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

Hirofumi Manabe, General Manager
Global Network Engineering and Operations Center
KDDI Corporation
2-3-2, Nishishinjuku, Shinjuku-ku, Tokyo 163-8003 Japan
Tel: +81 (3) 3347 6064
Email: hi-manabe@kddi.com

¹ File Nos. ITC-214-19970113-00019; ITC-214-19970212-00082; ITC-214-19970212-00085; ITC-214-19971014-00620; ITC-214-19980205-00076; ITC-214-19980205-00077; ITC-214-19980424-00275; ITC-214-19980607-00388; and ITC-214-20061027-00492.

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

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

The following entities hold a 10% or greater interest in KDDI:

Name: Kyocera Corporation
Address: 6, Takeda Tobadono-cho, Fushimi-ku, Kyoto, Japan 612-8501
Ownership: 12.76%
Citizenship: Japan
Principal Business: Electronic Equipment Manufacturing

The shares of Kyocera Corporation are publicly traded on the Tokyo Stock Exchange and the New York Stock Exchange and are widely held.

Name: Toyota Motor Corporation
Address: 1 Toyota-Cho, Toyota City, Aichi Prefecture 471-8571, Japan
Ownership: 11.09%
Citizenship: Japan
Principal Business: Automotive Manufacturing

The shares of Toyota Motor Corporation are publicly traded on the Tokyo Stock Exchange, the London Stock Exchange, and the New York Stock Exchange and are widely held.

KDDI does not have any interlocking directorates.

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

KDDI is a foreign carrier in Japan.

The following affiliates of KDDI are foreign carriers:

Affiliate Name	Country Where Licensed
KDDI Australia Pty. Ltd.	Australia
UBIK do Brasil Soluções em Tecnologia Ltda.	Brazil
KDDI Hong Kong Ltd.	Hong Kong
HKCOLO Ltd.	Hong Kong
Okinawa Cellular Telephone Co.	Japan
Japan Internet Exchange Co., Ltd	Japan
KDDI Korea Corp.	Korea
KDDI Malaysia Sdn. Bhd	Malaysia
MobiCom Corp.	Mongolia
KDDI Rus LLC	Russia
KDDI Singapore Pte. Ltd.	Singapore
KDDI Taiwan Corp.	Taiwan
KDDI Thailand Ltd.	Thailand

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

KDDI and its affiliates, Okinawa Cellular Telephone Co. and Japan Internet Exchange Co., Ltd are all licensed carriers in Japan.

KDDI affiliate, KDDI Taiwan Corp. is a licensed carrier in Taiwan.

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

Japan and Taiwan (listed as Chinese Taipei) are both members 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, KDDI 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)

KDDI 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)

KDDI is eligible for streamlined processing under Section 1.767(k)(3) of the Commission's rules. KDDI and its subsidiaries are foreign carriers in Japan under Section 63.09 of the Commission's rules and KDDI is presumed to possess market power in Japan.² However, Japan is a member of the WTO. Further, KDDI certifies that it will comply with the reporting requirements applicable to licensees that are foreign carriers with market power, as set forth in Section 1.767(l) of the Commission's rules.

Further, KDDI 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"). Oregon, the only U.S. state in which the FASTER 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.³

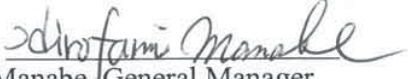
² See *List of Foreign Telecommunications Carriers that Are Presumed to Possess Market Power in Foreign Telecommunications Markets*, Public Notice, DA 07-233 (Jan. 26, 2007).

³ See Oregon Admin. Rules 660-035-0015; Oregon Coastal Management Program, Reviewed Federal Licenses and Permits, www.oregon.gov/LCD/OCMP/pages/fedcon_fedperms.aspx; National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Oregon's Listed Federal Actions, available at <http://coastalmanagement.noaa.gov/consistency/media/or.pdf>.

CERTIFICATION

I am authorized to enter this certification on behalf of KDDI Corporation.

I certify that all of the information contained in this application and Appendix F is true and correct to the best of my knowledge and belief.

By: 
Hirofumi Manabe, General Manager
Global Network Engineering and Operations Center
KDDI Corporation
2-3-2, Nishishinjuku, Shinjuku-ku
Tokyo 163-8003, Japan

For and on behalf of KDDI Corporation

Dated: June 19, 2015

APPENDIX G

SINGAPORE TELECOM USA INC.

Singapore Telecom USA Inc. (“Singtel USA”) is a U.S. subsidiary of Singapore Telecommunications Limited. Singtel USA holds authority from the Commission pursuant to Section 214 of the Communications Act of 1934, as amended, to operate as a global facilities-based and resale carrier in accordance with Sections 63.18(e)(1) and 63.18(e)(2) of the Commission’s rules, 47 C.F.R. §§ 63.18(e)(1) and (e)(2).¹

Singapore Telecommunications Limited (“Singtel”) is a company incorporated under the laws of the Republic of Singapore. Singtel is a global provider providing a range of communications services in Singapore and select foreign countries. Singtel offers long distance service, high-capacity connections, and a variety of other voice and data services, primarily to business customers. Singtel owns, operates, monitors and maintains extensive communications networks, with facilities in Singapore and other countries throughout the Asia-Pacific, North America and Europe. The company is involved in more than 35 submarine cable networks carrying mission-critical traffic for multinational customers worldwide. Additional information regarding Singtel is available at <http://welcome.singtel.com/default.asp>.

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

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

Singapore Telecom USA Inc.	FRN Number: 0006369235
100 Marine Parkway, Suite 450	
Redwood City, CA 94065	
United States of America	
Tel: (650) 508-6800	
Fax: (650) 508-1578	

(2) Place of Formation:

Singtel USA is incorporated in the State of California.

(3) Points of Contact:

Correspondence concerning the application should be sent to the following:

¹ File Nos. ITC-214-19981118-00808; ITC-214-19981118-00807; ITC-214-19981005-00681; ITC-214-19981005-00680.

Francis M Connors
Managing Director
Singapore Telecom USA Inc.
100 Marine Parkway, Suite 450
Redwood City
CA 94065, USA
Tel: (650) 508-6800
Fax: (650) 508-6829

With a copy to:

Tay Yang Hwee
Director, Submarine Cable & Ventures
Singapore Telecommunications Limited
31c Exeter Road
#06-01 Comcentre III
Singapore 237934
Tel: (65) 6838-8503
Fax: (65) 6738-3165

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

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

As of May 25, 2015, the only person holding a 10 percent or greater interest in Singtel USA is:

Name: Singapore Telecommunications Limited
Address: 31 Exeter Road
Comcentre
Singapore 239732
Ownership: 100%
Citizenship: Singapore
Principal Business: Telecommunications systems, services and investment holding.

As of May 25, 2015, the persons holding a 10 percent or greater interest in Singtel are:

Name: Temasek Holdings (Private) Limited (“Temasek Holdings”)
Address: 60B Orchard Road
#06-18 Tower 2
The Atrium@Orchard
Singapore 238891
Ownership: 51.18%
Citizenship: Singapore
Principal Business: Investment company that owns and manages its assets on a commercial basis.

Temasek Holdings is an Asia investment house headquartered in Singapore. Temasek Holdings invests in diverse industry sectors such as banking and financial services, real estate, transportation and logistics, infrastructure, telecommunications and media, bioscience and healthcare, education, consumer and lifestyle, engineering and technology, and energy and resources. Additional information on Temasek Holdings can be found at <http://www.temasekholdings.com.sg>.

Temasek Holdings is wholly owned by the Minister for Finance, Inc., a corporation created by the Minister for Finance (Incorporation Act) to engage in certain commercial activities on behalf of the Government of Singapore. Minister for Finance, Inc. is controlled by the Minister for Finance of the Government of Singapore.

Name: Minister for Finance, Inc.
Address: 100 High Street #06-03
The Treasury
Singapore 179434
Ownership: 100% (representing a 51.18 indirect interest in Singtel)
Citizenship: Singapore
Permitted Activities: The Minister for Finance, Inc. may acquire, purchase, take, hold, and enjoy movable and immovable property of every description, and may convey, assign, surrender and yield up, mortgage, demise, reassign, transfer or otherwise dispose of, or deal with, any movable or immovable property vested in the entity upon such terms as it deems fit.

The other persons holding a 10 percent or greater interest in Singtel are Citibank Nominees Singapore Pte Ltd and DBS Nominees Pte Ltd.

Name: Citibank Nominees Singapore Pte Ltd
Address: 3 Temasek Avenue
Suite #12-00 Centennial Tower
Singapore 039190
Ownership: 10.94%
Citizenship: Singapore
Principal Business: Operates as a diversified financial service provider.

Citibank Nominees Singapore Pte. Ltd. was incorporated in 1988 and is based in Singapore. Citibank Nominees Singapore Pte. Ltd. operates as a subsidiary of Citibank, National Association, a U.S.-based financial institution. Additional information about Citibank is available at: <http://www.citigroup.com/citi/>.

Name: DBS Nominees Pte Ltd
Address: 12 Marina Boulevard
Marina Bay Financial
Centre Tower 3
Singapore 018982
Ownership: 10.65%

Citizenship: Singapore
Principal Business: Provides nominee services.

DBS Nominees Pte. Ltd. Was incorporated in 1969 and is based on Singapore. DBS Nominees Pte Ltd operates as a subsidiary of DBS Bank Ltd. Additional information about DBS Bank Ltd is available at: <http://www.dbs.com>.

To the knowledge of Singtel USA, no other person or entity holds a 10% or higher direct or indirect ownership interest in Singtel.

Singtel USA has interlocking directorates with various of its affiliates listed in response to Section 63.18(i) below.

The interlocking directorates for various affiliates (except Optus) are:

- Chang York Chye
- Lim Seng Kong

Singtel USA has no other interlocking directorates.

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

Singtel USA is not a foreign carrier.

Singtel USA's parent company, Singtel, is a foreign carrier, as that term is defined by Section 63.09 of the Commission's rules, 47 C.F.R. § 63.09(d). In Singapore, Singtel, directly and through its subsidiaries, is licensed to provide various telecommunications services to the public. In addition, Singtel provides telecommunications services to the public through affiliates operating in the following countries:

Name of the affiliated foreign carrier:	Countries in which carrier is authorized to provide telecommunications services to the public:
Singtel Optus Pty Limited	Australia
Singapore Telecom Hong Kong Limited	Hong Kong
Singapore Telecommunications Japan Co Ltd	Japan
Singapore Telecommunications Korea	South Korea
Information Network Services Sdn Bhd	Malaysia
Singtel Taiwan Limited	Taiwan
Singtel (Europe) Limited	United Kingdom

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

As noted above, Singapore Telecommunications Japan Co Ltd (“Singtel Japan”) is a foreign carrier in Japan, and Singtel Taiwan Limited (“Singtel Taiwan”) is a foreign carrier in Taiwan. Singtel Japan and Singtel Taiwan are both affiliates of Singtel USA.

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

Japan has been a full member of the WTO since January 1, 1995. Taiwan (listed as Chinese Taipei) has been a full member of the WTO since January 1, 2002.

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

Pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, Singtel USA 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)

Singtel USA 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)

Singtel USA Inc. is eligible for streamlined processing under Section 1.767(k) of the Commission's rules. Although Singtel Japan and Singtel Taiwan are foreign carriers in their respective destination markets, both are competitive entrants and lack sufficient market power in those markets to affect competition adversely on the U.S.-Japan or U.S.-Taiwan routes. Finally, Japan and Taiwan are WTO members. Accordingly, streamlined treatment is appropriate.

Further, Singtel USA 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”). Oregon, the only U.S. state in which the Faster 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 Oregon Admin. Rules 660-035-0015; Oregon Coastal Management Program, Reviewed Federal Licenses and Permits, www.oregon.gov/LCD/OCMP/pages/fedcon_fedperms.aspx; National Oceanic and Atmospheric Administration, Coastal Zone Management Program; Oregon's Listed Federal Actions, *available at* <http://coastalmanagement.noaa.gov/consistency/media/or.pdf>.

CERTIFICATION

I am authorized to enter this certification on behalf of Singapore Telecom USA Inc.

I certify that all of the information contained in this application and Appendix G is true and correct to the best of my knowledge and belief.



Francis M Connors
Managing Director
Singapore Telecom USA Inc.
100 Marine Parkway, Suite 450
Redwood City
CA 94065, USA
Tel: (650) 508-6800
Fax: (650) 508-6829

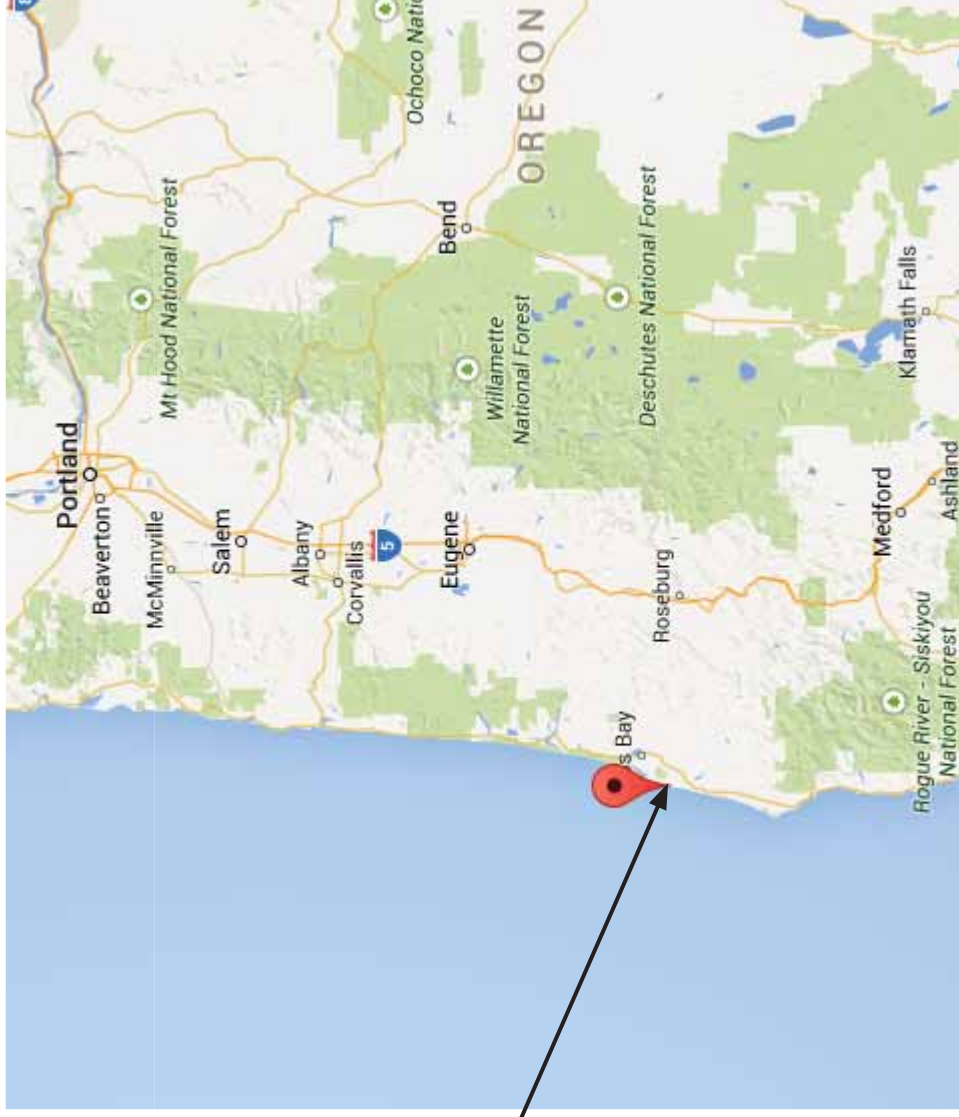
Dated: June 21, 2015

APPENDIX H

IMAGES OF U.S. LANDING

Bandon, Oregon

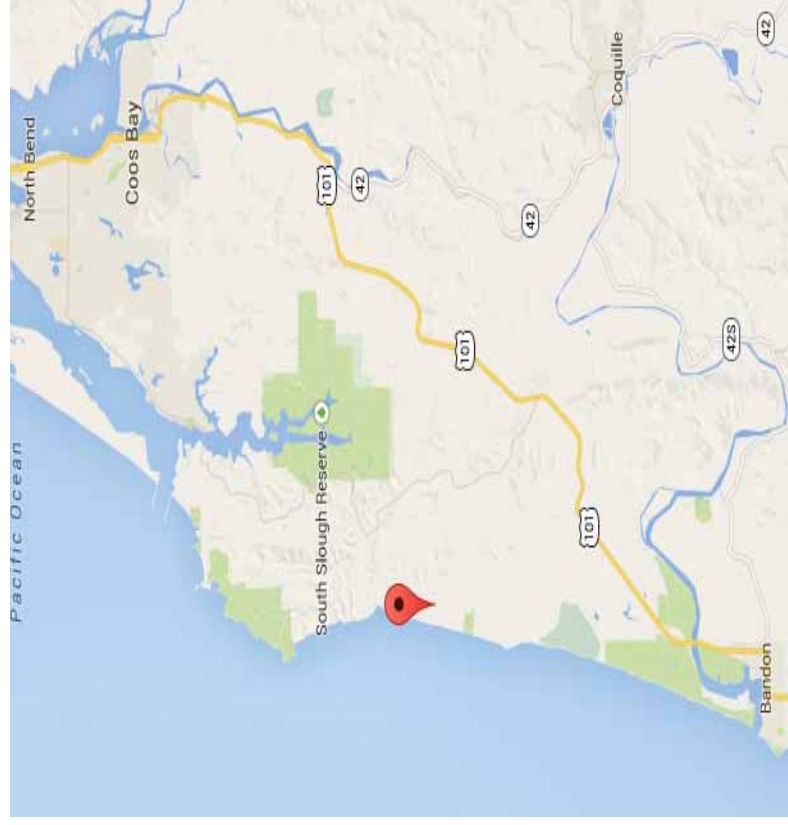
BMH Bandon,
Oregon-Approx.
385km South
West of Portland.



Area of BMH and existing Cable Landing Station

Beach Manhole (BMH)
North 43°14'53.8332"
West 124°23'10.2660"

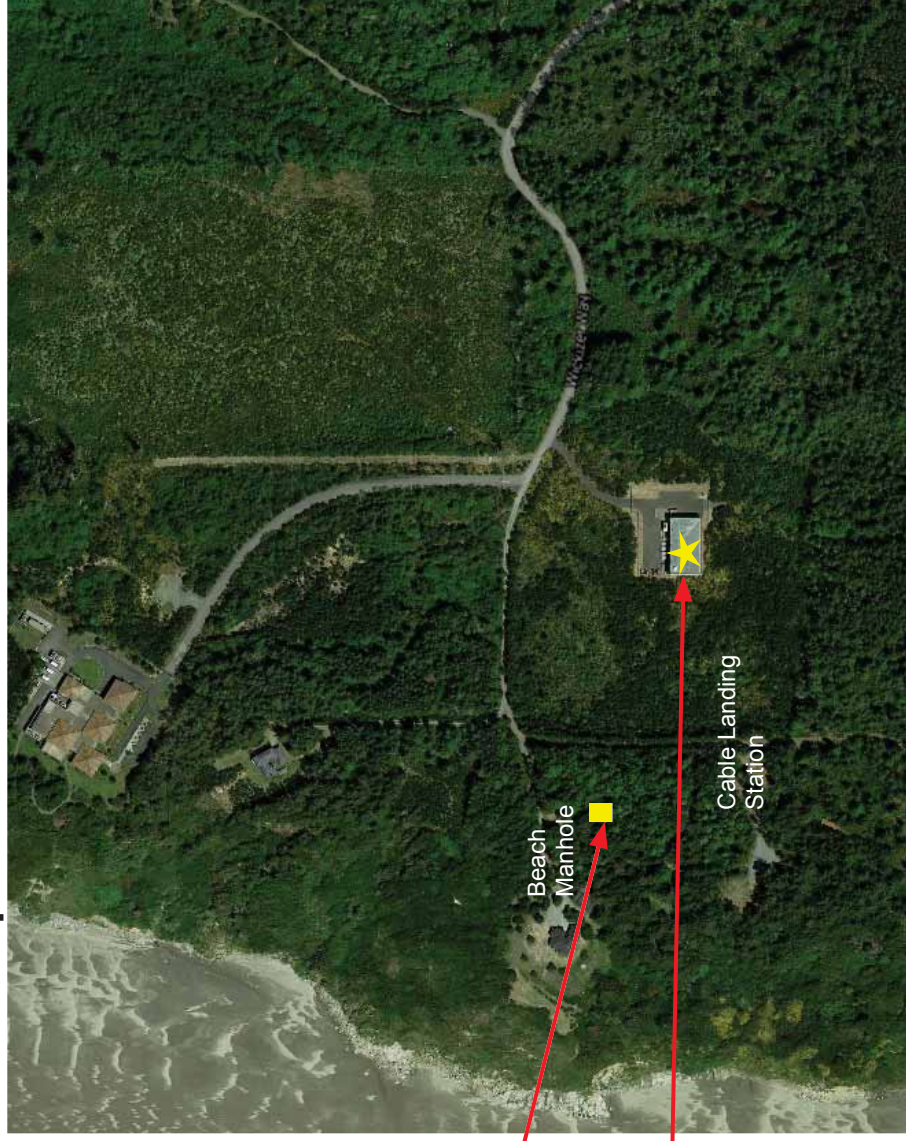
Bandon Cable Landing
Station (CLS)
North 43°14'51.6408"
West 124°23'02.1012"



FASTER US CLS and Proposed Beach Manhole

Beach Manhole (BMH)
North 43°14'53.8332"
West 124°23'10.2660"

Bandon Cable Landing
Station (CLS)
North 43°14'51.6408"
West 124°23'02.1012"



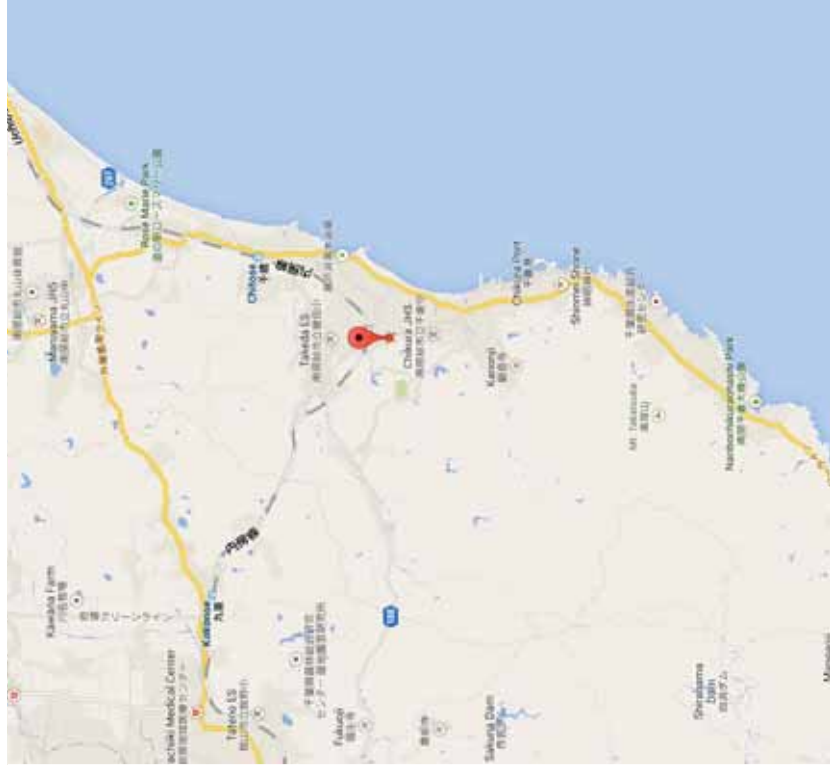
FASTER US CLS Closer View



APPENDIX I

IMAGES OF JAPAN LANDINGS

Chikura Cable Landing Station

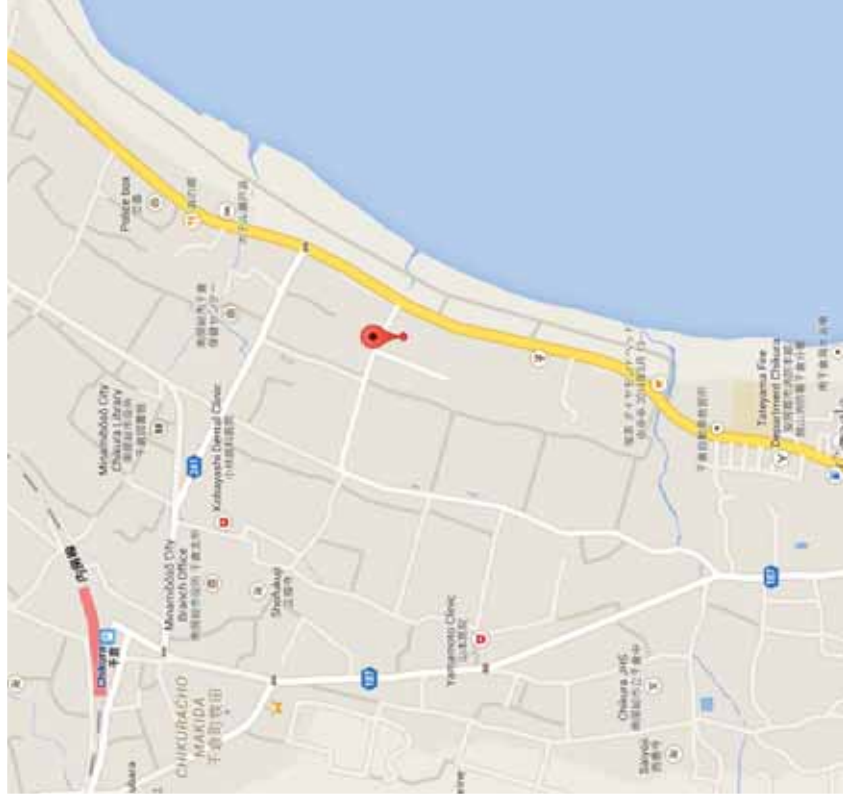


Chikura Cable Landing Station (CLS)

Latitude 34°58'26.4540"N

Longitude 139°57'11.7576"E

Chikura Beach Manhole



Chikura BMH

Latitude 34°58'18.90"N

Longitude 139°57'38.10"E

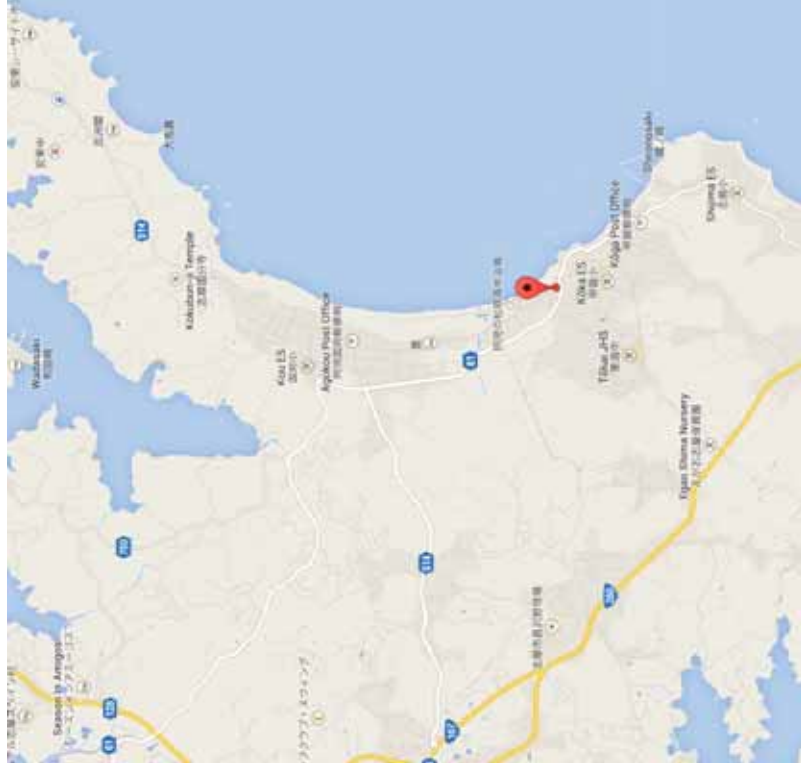
Chikura CLS and Beach Manhole



Chikura CLS Street View



Shima Cable Landing Station

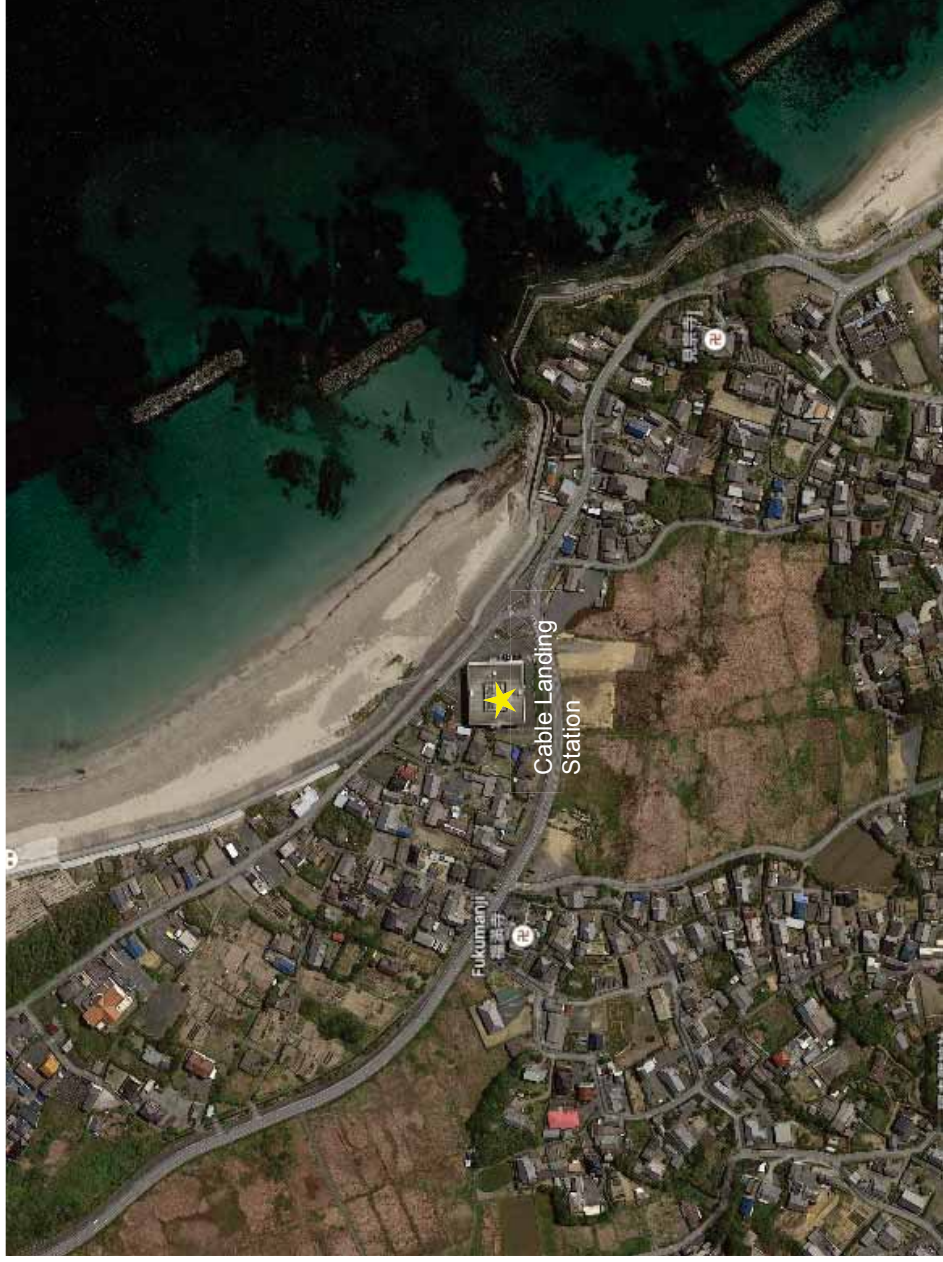


Shima South Cable Landing Station (CLS)

Latitude 34°19'21.5040"N

Longitude 136°52'45.6960"E

Shima CLS



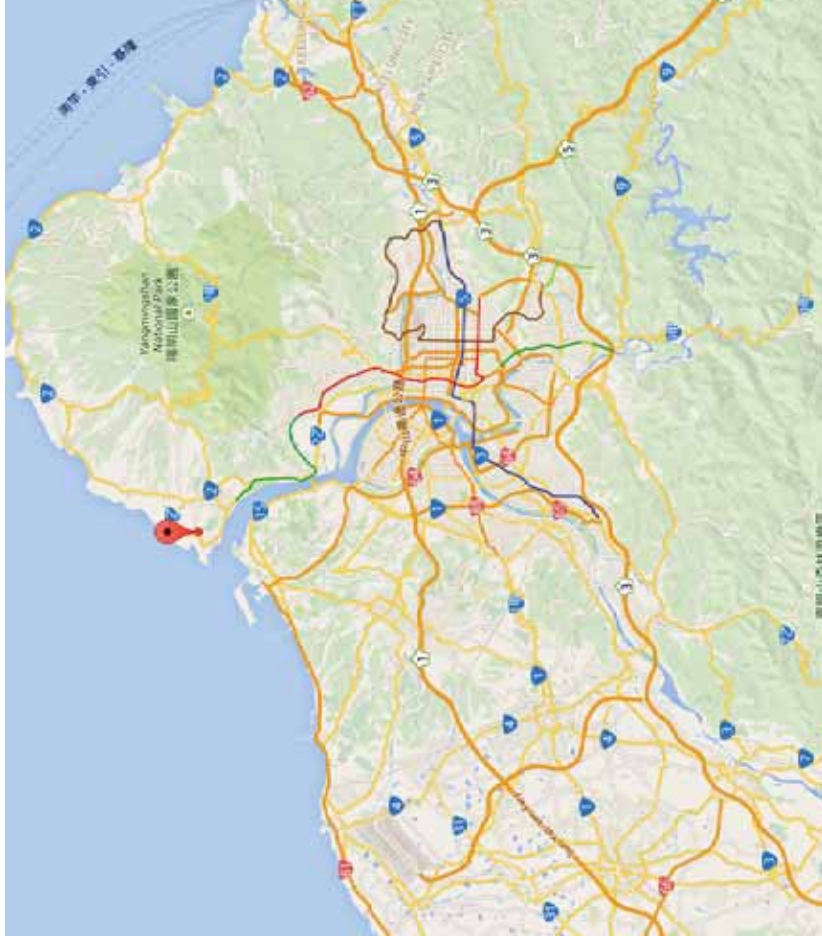
Shima CLS Street View



APPENDIX J

IMAGES OF TAIWAN LANDING

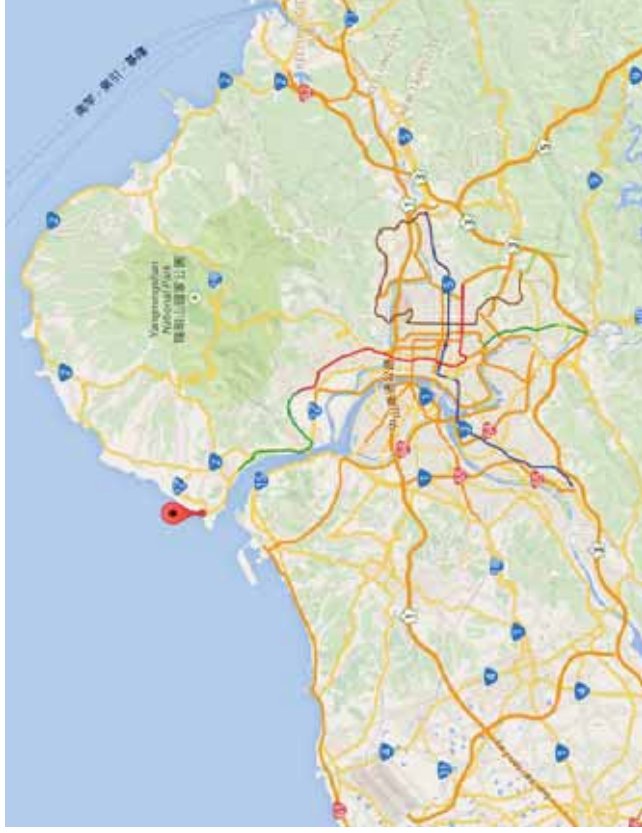
Tanshui Cable Landing Station



Tanshui Cable Landing Station (CLS)

Latitude 25°11'18.71"N
Longitude 121°25'35.77"E

Tanshui Beach Manhole



Tanshui BMH

Latitude 25°11'23.64"N

Longitude 121°25'3.54"E

Tanshui CLS and Beach Manhole



Tanshui CLS Street View

