

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

In the Matter of)	
)	
Globe Telecom, Inc., GTI Corporation,)	File No. SCL-LIC-20150626-00016
Hawaiian Telcom Services Company, Inc.,)	
RAM Telecom International, Inc.,)	
TeleGuam Holdings, LLC, d/b/a GTA)	
TeleGuam, PT Telekomunikasi Indonesia)	
International, and Telekomunikasi Indonesia)	
International (USA) Inc.,)	
)	
Application for a License to Land and)	
Operate a Private Fiber-Optic Cable System)	
Connecting Indonesia, the Philippines,)	
Guam, Hawaii, and the United States)	

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

The Department of Homeland Security (“DHS”) 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 the 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 GTI Corporation d/b/a GTI Telecom (“GTI”), Hawaiian Telcom Services Company, Inc. (“HT”), RAM Telecom International, Inc. (“RTI”), and TeleGuam Holdings, LLC d/b/a GTA (“GTA”) (each a “SEA-US Mitigation Party” and collectively the “SEA-US Mitigation Parties”) to abide by the undertakings set forth in the January 12, 2017, National Security Agreement (“2017 NSA”), which is attached hereto as Attachment A. The above-referenced proceedings involve an application seeking Commission approval to land and operate

¹ 47 C.F.R. § 1.41.

a fiber optic submarine cable system connecting the United States (including Hawaii and Guam), Indonesia, and the Philippines (FCC File No. SCL-LIC-20150626-00016).

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 (2001).

After discussions with representatives of the SEA-US Mitigation Parties in connection with the above-referenced proceedings, DHS has concluded that the commitments set forth in the 2016 NSA 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 the SEA-US Mitigation Parties with the 2017 NSA.

Respectfully submitted,

/S/ Shawn Cooley
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January 12, 2017

Attachment A (2017 National Security Agreement)