

APPENDIX A:

Microsoft Infrastructure Group, LLC

Microsoft Infrastructure Group, LLC (“MIGL”), will own, control, and operate the cable landing station for the New Cross Pacific (“NCP”) cable system’s Oregon landing and may eventually own additional U.S. territory assets used to support the offering of cloud services by other affiliates of Microsoft Corporation. MIGL is a wholly-owned, direct subsidiary of Microsoft Corporation. MIGL does not currently hold any FCC licenses or authorizations.

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

(1) Applicants’ Names, Addresses, and Telephone Numbers¹

Microsoft Infrastructure Group, LLC
One Microsoft Way
Redmond, Washington 98052
+1 425 882 8080

(2) Applicants’ Places of Incorporation²

MIGL is a limited-liability company organized under Washington law.

(3) Contact Information³

Katie Myers
Attorney
Microsoft Corporation
One Microsoft Way
Redmond, Washington 98052
+ 1 425 722 2460
katie.myers@microsoft.com

¹ See 47 C.F.R. § 1.767(a)(1).

² See *id.* § 1.767(a)(2).

³ See *id.* § 1.767(a)(3).

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for Microsoft Infrastructure Group, LLC

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁴

By the signature below, MIGL certifies to the following. MIGL has the following 10-percent-or-greater direct or indirect interest holders:

Microsoft Corporation

Address: One Microsoft Way, Redmond, Washington 98052

Citizenship: Delaware

Principal Business: software and technology

Relationship: Microsoft Corporation owns 100 percent of MIGL's member interests.

Microsoft Corporation's shares trade publicly on the NASDAQ Stock Market under the symbol "MSFT." As there is an active market in Microsoft Corporation's shares, Microsoft Corporation's share ownership is always fluid. Moreover, Microsoft Corporation can ascertain its significant shareholders only on the basis of its records and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations, as of the most recent measurable date, Microsoft Corporation has no 10-percent-or-greater direct or indirect shareholders.

No corporate officer and director of MIGL is also an officer or director of any foreign carrier.

⁴ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁵

By its signature below, MIGL certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁶

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁷

By the signature below, MIGL certifies that it:

(A) is not a foreign carrier in any foreign country;

(B) does not own or control a cable landing station in any foreign country;

(C) is not affiliated with any foreign carrier and is not affiliated with any entity owning or controlling a cable landing station in any foreign country.

(7) Certification Regarding Destination Countries⁸

By the signature below, MIGL certifies to the following: (A) it is not a foreign carrier in China, Japan, Korea, or Taiwan, the four foreign destination markets in which the NCP system will land; (B) it does not control a foreign carrier in China, Japan, Korea, or Taiwan; (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in China, Japan, Korea, or Taiwan; and (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, or Taiwan) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual

⁵ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁶ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4310, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4827, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁷ See 47 C.F.R. § 1.767(a)(8)(ii).

⁸ See *id.* § 1.767(a)(8)(iii).

relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the NCP system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets⁹

No response is required, as MIGL did not identify any markets in response to 47 C.F.R. § 1.767(a)(8)(iii).

(9) Certification Regarding Routine Conditions¹⁰

By the signature below, MIGL certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹¹

MIGL requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). MIGL certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in China, Japan, Korea, or Taiwan, the four foreign destination markets in which NCP will land.

⁹ See *id.* § 1.767(a)(8)(iv).

¹⁰ See 47 C.F.R. § 1.767(a)(9).

¹¹ See *id.* § 1.767(j), (k).

(11) Streamlining—CZMA¹²

By the signature below, MIGL certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹³

¹² *See id.*

¹³ *See* Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of MIGL, I certify that all of the information contained in this application and Appendix A is true and correct to the best of my knowledge and belief.

Microsoft Infrastructure Group, LLC



Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Benjamin O. Orndorff
Manager
Microsoft Infrastructure Group, LLC
One Microsoft Way
Redmond, Washington 98052
+1 425 722 0528
benorn@microsoft.com

*Counsel for
Microsoft Infrastructure Group, LLC*

APPENDIX B:

Microsoft Operations Pte Ltd

Microsoft Operations Pte Ltd (“MOPL”) is a member of the consortium that will own and operate the New Cross Pacific (“NCP”) cable system. MOPL manufactures, licenses, and distributes Microsoft products and services in the Asia-Pacific region and is a wholly-owned, indirect subsidiary of Microsoft Corporation. MOPL is organized under the laws of Singapore, with its principal place of business in Singapore. MOPL does not currently hold any FCC licenses or authorizations.

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

(1) Applicants’ Names, Addresses, and Telephone Numbers¹

Microsoft Operations Pte Ltd
80 Raffles Place
#32-01
UOB Plaza 1
Singapore 048624
+65 6888 8899

(2) Applicants’ Places of Incorporation²

MOPL is a private limited company organized under Singapore law.

(3) Contact Information³

Katie Myers
Attorney
Microsoft Corporation
One Microsoft Way
Redmond, Washington 98052
+ 1 425 722 2460
katie.myers@microsoft.com

¹ See 47 C.F.R. § 1.767(a)(1).

² See *id.* § 1.767(a)(2).

³ See *id.* § 1.767(a)(3).

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for Microsoft Operations Pte Ltd

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁴

By the signature below, MOPL certifies that it has the following 10-percent-or-greater direct or indirect interest holders:

Microsoft Singapore Holdings Pte Ltd (“MSHPL”)

Address: 80 Raffles Place #32-01, UOB Plaza 1, Singapore 048624

Citizenship: Singapore

Principal Business: technology manufacturing and services

Relationship: MSHPL owns 100 percent of MOPL’s shares.

Microsoft Corporation

Address: One Microsoft Way

Redmond, Washington 98052

Citizenship: Delaware

Principal Business: software and technology

Relationship: Microsoft Corporation owns 100 percent of MSHPL’s shares.

Microsoft Corporation’s shares trade publicly on the NASDAQ Stock Market under the symbol “MSFT.” As there is an active market in Microsoft Corporation’s shares, Microsoft Corporation’s share ownership is always fluid. Moreover, Microsoft Corporation can ascertain its significant shareholders only on the basis of its records and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations, as of the

⁴ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

most recent measurable date, Microsoft Corporation has no 10-percent-or-greater direct or indirect shareholders.

No corporate officer or director of MOPL is also an officer or director of a foreign carrier.

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁵

By its signature below, MOPL certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁶

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁷

By the signature below, MOPL certifies that it:

(A) is not a foreign carrier in any foreign country;

(B) does not own or control a cable station in any foreign country;

(C) is not affiliated with any foreign carrier and is not affiliated with any entity owning or controlling a cable landing station in any foreign country.

(7) Certification Regarding Destination Countries⁸

By the signature below, MOPL certifies to the following: (A) it is not a foreign carrier in China, Japan, Korea, or Taiwan, the four foreign destination markets in which the NCP system will land; (B) it does not control a foreign carrier in China, Japan, Korea, or Taiwan; (C) no

⁵ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁶ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4310, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4827, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁷ See 47 C.F.R. § 1.767(a)(8)(ii).

⁸ See *id.* § 1.767(a)(8)(iii).

entity owning more than 25 percent of it or controlling it controls a foreign carrier in China, Japan, Korea, or Taiwan; and (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, and/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 arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the NCP system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets⁹

No response is required, as MOPL did not identify any markets in response to 47 C.F.R. § 1.767(a)(8)(iii).

(9) Certification Regarding Routine Conditions¹⁰

By the signature below, MOPL certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹¹

MOPL requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). MOPL certifies that it is not a foreign carrier and is not affiliated with a foreign carrier in China, Japan, Korea, or Taiwan, the four foreign destination markets in which NCP will land.

(11) Streamlining—CZMA¹²

By the signature below, MOPL certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management

⁹ See *id.* § 1.767(a)(8)(iv).

¹⁰ See 47 C.F.R. § 1.767(a)(9).

¹¹ See *id.* § 1.767(j), (k).

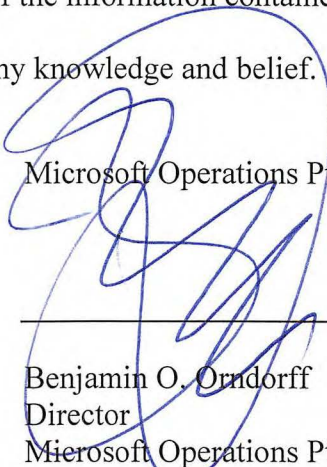
¹² See *id.*

Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹³

¹³ See Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of MOPL, I certify that all of the information contained in this application and Appendix B is true and correct to the best of my knowledge and belief.


Microsoft Operations Pte Ltd

Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Benjamin O. Orndorff
Director
Microsoft Operations Pte Ltd
One Microsoft Way
Redmond, Washington 98052
+1 425 722 0528
benorn@microsoft.com

Counsel for Microsoft Operations Pte Ltd

APPENDIX C:
CHINA MOBILE INTERNATIONAL LIMITED

China Mobile International Limited (“CMI”) manages and operates the international businesses of China Mobile Limited (“CML”), of which it is a wholly-owned, indirect subsidiary. Organized under Hong Kong law and headquartered in Hong Kong, CMI provides voice, data, mobile, and value-added services. CMI’s wholly-owned, indirect subsidiary China Mobile International (USA) Inc. (“CMIUSA”), has applied to the Commission for, but not yet received, global facilities-based and global resale authority under Section 214 of the Communications Act, as amended.¹

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

(1) Applicants’ Names, Addresses, and Telephone Numbers²

China Mobile International Limited
Level 30, Tower 1, Kowloon Commerce Centre,
No. 51 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong
+ 852 3975 6688

(2) Applicants’ Places of Incorporation³

CMI is a limited company organized under Hong Kong law.

¹ See FCC File No. ITC-214-20110901-00289.

² See 47 C.F.R. § 1.767(a)(1).

³ See *id.* § 1.767(a)(2).

(3) Contact Information⁴

Ricky Lo
Chief Network Officer, Technologies & Network
China Mobile International Limited
Level 30, Tower 1, Kowloon Commerce Centre
No. 51 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong
+852 3155 6800
rickylo@cmi.chinamobile.com

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for China Mobile International Limited

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁵

By the signature below, CMI certifies to the following. CMI has the following 10-percent-or-greater direct or indirect interest holders:

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 directly owns 100 percent of CMI.

China Mobile Limited (“CML”)

Address: 60/F, The Center, 99 Queen’s Road Central, Hong Kong

Citizenship: Hong Kong SAR

Principal Business: telecommunications

Relationship: CML directly owns 100 percent of CMIHL.

⁴ See *id.* § 1.767(a)(3).

⁵ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

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 directly owns 72.72 percent of CML (as of 30 June 2015).

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 Chinese Government owns 100 percent of CMCC.

The following corporate officers and directors of CMI are also officers or directors of other foreign carriers:

- Fan Yunjun, who is a director of CMI, is also a director of China Mobile Hong Kong Company Limited, China Mobile International (UK) Limited, and China Mobile International (Singapore) Pte. Ltd.;
- Shen Weizhong, who is a director of CMI, is also a director of China Mobile International KK and China Mobile International (Germany) GmbH;

- Lei Liqun, who is a director of CMI, China Mobile International (UK) Limited, China Mobile International (Singapore) Pte. Ltd, China Mobile International KK, and China Mobile International (Germany) GmbH;
- Bian Yannan, who is a director of CMI, is also a director of China Mobile Hong Kong Company Limited and China Mobile Pakistan Ltd d/b/a Zong;
- Nie Yutian, who is a director of CMI, is also a director of China Mobile Hong Kong Company Limited and China Mobile Pakistan Ltd d/b/a Zong; and
- Huang Ying, who is a director of CMI, is also a director of China Mobile Hong Kong Company Limited and China Mobile Pakistan Ltd d/b/a Zong.

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁶

By its signature below, CMI certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁷

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁸

By the signature below, CMI certifies that it:

- (A) is a foreign carrier in Hong Kong;
- (B) owns or controls a cable station in Hong Kong; and

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁷ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4181, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4789, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁸ See 47 C.F.R. § 1.767(a)(8)(ii).

(C) is affiliated with foreign carriers in China, Germany, Hong Kong, Japan, Pakistan, Singapore, and the United Kingdom, two of which own or control a cable landing station, as listed in Table 1 below.

TABLE 1: AFFILIATED FOREIGN CARRIERS

Entity	Country	Owns/Controls Cable Landing Station? Y/N
China Mobile Group Anhui Company Limited	China	N
China Mobile Group Beijing Company Limited	China	N
China Mobile Group Chongqing Company Limited	China	N
China Mobile Group Fujian Company Limited	China	N
China Mobile Group Gansu Company Limited	China	N
China Mobile Group Guangdong Company Limited	China	N
China Mobile Group Guangxi Company Limited	China	N
China Mobile Group Guizhou Company Limited	China	N
China Mobile Group Hainan Company Limited	China	N
China Mobile Group Hebei Company Limited	China	N
China Mobile Group Heilongjiang Company Limited	China	N
China Mobile Group Henan Company Limited	China	N
China Mobile Group Hubei Company Limited	China	N
China Mobile Group Hunan Company Limited	China	N
China Mobile Group Jiangsu Company Limited	China	N
China Mobile Group Jiangxi Company Limited	China	N
China Mobile Group Jilin Company Limited	China	N
China Mobile Group Liaoning Company Limited	China	N
China Mobile Group Neimenggu Company Limited	China	N
China Mobile Group Ningxia Company Limited	China	N
China Mobile Group Qinghai Company Limited	China	N
China Mobile Group Shaanxi Company Limited	China	N
China Mobile Group Shandong Company Limited	China	N
China Mobile Group Shanghai Company Limited	China	N
China Mobile Group Shanxi Company Limited	China	N
China Mobile Group Sichuan Company Limited	China	N
China Mobile Group Tianjin Company Limited	China	N
China Mobile Group Xinjiang Company Limited	China	N
China Mobile Group Xizang Company Limited	China	N
China Mobile Group Yunnan Company Limited	China	N
China Mobile Group Zhejiang Company Limited	China	N
China Satellite Communications Co. Ltd. (“China Satcom”)	China	N

Entity	Country	Owns/Controls Cable Landing Station? Y/N
China Telecommunications Corporation (China Telecom), including its foreign carrier subsidiaries	China and others—see China Telecom appendix to this application	Y
China United Network Communications Group Company Limited (“China Unicom”), including its foreign carrier subsidiaries	China and others—see China Unicom appendix to this application	Y
China Mobile International (Germany) GmbH	Germany	N
China Mobile Hong Kong Company Limited	Hong Kong	N
China Mobile Hong Kong Limited	Hong Kong	N
China Mobile International K.K. (“CMI Japan”)	Japan	N
China Mobile Pakistan Ltd d/b/a Zong	Pakistan	N
China Mobile International (Singapore) Pte. Ltd.	Singapore	N
China Mobile International (UK) Limited	United Kingdom	N

Although CMI is (indirectly) under common control with China Unicom, China Telecom, and their subsidiaries due to their ultimate common ownership by the Chinese Government, these companies are structurally and legally separate and operate independently of each other. They have separate directors, management, and employees and deal with each other on a strictly arm’s length basis. Indeed, these companies and their operating subsidiaries compete vigorously with each other, and CMI enjoys no legal or practical advantage over other competitive carriers in obtaining interconnection and related services from China Unicom, China Telecom, or their subsidiaries.

CMI has no first-hand knowledge of or access to information about the investments and operations of China Unicom, China Telecom, or their subsidiaries. For more detailed and accurate information about the subsidiaries of China Unicom and China Telecom—and to avoid unnecessary duplication in the appendices to this cable landing license application—please see the China Unicom and China Telecom appendices to this application.

(7) Certification Regarding Destination Countries⁹

By the signature below, CMI certifies to the following:

- (A) it is not a foreign carrier in China, Japan, Korea, or Taiwan, the four foreign destination markets in which the NCP system will land;
- (B) it controls a foreign carrier in Japan, as described in part I(6) above, but controls no foreign carriers in China, Korea or Taiwan;
- (C) CML, which indirectly owns more than 25 percent of—and controls—CMI, also owns and/or controls certain foreign carriers in China, as described in part I(6) above; CMCC, which indirectly owns more than 25 percent of CMI, is under common Chinese Government ownership with the Chinese carriers China Unicom, China Telecom, China Satcom, and their subsidiaries, as noted in part I(6) above; and
- (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, and/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 arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the NCP system in the United States.

⁹ See *id.* § 1.767(a)(8)(iii).

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹⁰

By its signature below, CMI certifies that China and Japan, the countries identified above in response to 47 C.F.R. § 1.767(a)(8), are members of the World Trade Organization.¹¹

(9) Certification Regarding Routine Conditions¹²

By the signature below, CMI certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹³

CMI requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3), based on affiliation with one or more carriers having market power in China. CMI is affiliated with China Unicom, China Telecom, and their foreign carrier subsidiaries, some of which are foreign carriers in China having greater than fifty-percent market share in either the international-transport or local access markets of China. As noted in part I(8) above, China is a WTO member. CMI agrees to accept and abide by the reporting requirements set forth in 47 C.F.R. § 1.767(l).

(11) Streamlining—CZMA¹⁴

By the signature below, CMI certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management

¹⁰ See *id.* § 1.767(a)(8)(iv).

¹¹ See List of WTO Members and Observers (as of April 26, 2015), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

¹² See 47 C.F.R. § 1.767(a)(9).

¹³ See *id.* § 1.767(j), (k).

¹⁴ See *id.* § 1.767(k)(4).

Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁵

¹⁵ See Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of CMI, I certify that all of the information contained in this application and Appendix C is true and correct to the best of my knowledge and belief.

China Mobile International Limited



Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337 tel
kbressie@hwglaw.com

*Counsel for
China Mobile International Limited*

Ricky Lo
Chief Network Officer, Technologies & Network
China Mobile International Limited
Level 30, Tower 1, Kowloon Commerce Centre
No. 51 Kwai Cheong Road
Kwai Chung, New Territories
Hong Kong
+852 3155 6800
rickylo@cmi.chinamobile.com



APPENDIX D:

CHINA TELECOMMUNICATIONS CORPORATION

China Telecommunications Corporation (“**China Telecom**”) is a Chinese corporation with its principal place of business in Beijing, China. China Telecom provides fixed-line telephone service, mobile service, Internet access service, and information services. China Telecom is a joint licensee for the Trans-Pacific Express submarine cable system.¹ Its U.S. subsidiary, China Telecom (USA) Corporation holds from the Commission two international Section 214 authorizations for (1) global facilities-based services and (2) global resale services.² China Telecom is wholly owned by the Chinese Government through the State-Owned Assets Supervision and Administration Commission of the State Council of China.

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

(1) Applicants’ Names, Addresses, and Telephone Numbers³

China Telecommunications Corporation

31 Jinrong Street
Xicheng District
Beijing, 100033 China
+86 10 58501800

(2) Applicants’ Places of Incorporation⁴

China Telecom is a corporation organized under Chinese law.

¹ *Actions Taken Under Cable Landing License Act*, Public Notice, 23 FCC Rcd. 227 (2008).

² *See* FCC File Nos. ITC-214-20020716-00371, ITC-214-20010613-00346.

³ *See* 47 C.F.R. § 1.767(a)(1).

⁴ *See id.* § 1.767(a)(2).

(3) Contact Information⁵

Chu Peng Kui
Project Manager
China Telecommunications Corporation
31 Jinrong Street
Xicheng District
Beijing, 100033 China
+86 10 59501081
chupk@chinatelecomglobal.com

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for China Telecommunications Corporation

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶

By the signature below, China Telecom certifies that it has one 10-percent-or-greater direct or indirect interest holder:

State-Owned Assets Supervision and Administration Commission of the State Council of China (“SASAC”)

Address: #26, XuanWuMenXi Street, XuanWu District, Beijing, China 100053

Place of organization: China

Principal Business: government

Relationship: SASAC directly owns 100 percent of China Telecom.

The following corporate officers and directors of China Telecom are also officers or directors of other foreign carriers:

⁵ See *id.* § 1.767(a)(3).

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

Mr. Yang Jie

- China Telecom: President
- China Telecom Corporation Limited: Executive Director, President and COO

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁷

By its signature below, China Telecom certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁸

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁹

By the signature below, China Telecom certifies that it:

- (A) is a foreign carrier in China;
- (B) controls cable stations in Chongming, Shantou and Xiamen, China;
- (C) is affiliated with foreign carriers in Brazil, Canada, China, Hong Kong and Macau, two of which own or control a cable landing station, as listed in Table 1 below.

⁷ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁸ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4181, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4789, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁹ See 47 C.F.R. § 1.767(a)(8)(ii).

TABLE 1: AFFILIATED FOREIGN CARRIERS

Entity	Country	Owns/Controls Cable Landing Station? Y/N
China Telecom do Brasil Ltda.	Brazil	N
China Telecom (Canada) Corporation	Canada	N
China Mobile Limited (“CML”)’s foreign carrier subsidiaries (“CML Foreign Carrier Subsidiaries”)	China and others—see CMI appendix to this application	N
China Satellite Communications Co. Ltd. (“China Satcom”)	China	N
China Telecom Corporation Limited	China	N
China United Network Communications Group Company Limited (“China Unicom”), including its foreign carrier subsidiaries	China and others—see China Unicom appendix to this application	Y
China Mobile International Limited (“CMI”), including its foreign carrier subsidiaries	Hong Kong and others—see CMI appendix to this application	Y
China Telecom Global Limited	Hong Kong	N
China Telecom (Macau) Company Limited	Macau	N

Although China Telecom is under common control with China Unicom, CML, CMI, and their subsidiaries due to their ultimate common ownership by the Chinese Government, these companies are structurally and legally separate and operate independently of each other. They have separate directors, management, and employees and deal with each other on a strictly arm’s length basis. Indeed, these companies and their operating subsidiaries compete vigorously with each other, and China Telecom enjoys no legal or practical advantage over other competitive carriers in obtaining interconnection and related services from China Unicom, CML, CMI, or their subsidiaries.

China Telecom has no first-hand knowledge of or access to information about the investments and operations of China Unicom, CML, CMI, or their subsidiaries. For more

detailed and accurate information about the subsidiaries of China Unicom, CML, and CMI—and to avoid unnecessary duplication in the appendices to this cable landing license application—please see the China Unicom and CMI appendices to this application.

(7) Certification Regarding Destination Countries/Regions¹⁰

By the signature below, China Telecom certifies that:

- (A) it is a foreign carrier in China, one of the four foreign destination markets in which the NCP system will land;
- (B) it controls foreign carriers in China, as described in Table of part I (6) above, but controls no foreign carriers in Japan, Korea, or Taiwan;
- (C) except for other carriers under the common control of the Chinese Government, as described in part I(6), no entity owning more than 25 percent of China Telecom or controlling it controls a foreign carrier in China, Japan, Korea, or Taiwan; and
- (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, and/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 arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the NCP system in the United States.

¹⁰ See *id.* § 1.767(a)(8)(iii).

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹¹

By its signature below, China Telecom certifies that China, the country identified above in response to 47 C.F.R. § 1.767(a)(8), is a member of the World Trade Organization.¹²

(9) Certification Regarding Routine Conditions¹³

By the signature below, China Telecom certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹⁴

China Telecom requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3), based on affiliation with one or more carriers having market power in China.¹⁵ China Telecom is affiliated with China Unicom, China Mobile, and their foreign carrier subsidiaries, some of which are foreign carriers in China having greater than fifty-percent market share in either the international-transport or local access markets of China. As noted in part I(8) above, China is a WTO member. China Telecom agrees to accept and abide by the reporting requirements set forth in 47 C.F.R. § 1.767(l).

¹¹ See *id.* § 1.767(a)(8)(iv).

¹² See List of WTO Members and Observers (as of April 26, 2015), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

¹³ See 47 C.F.R. § 1.767(a)(9).

¹⁴ See *id.* § 1.767(j), (k).

¹⁵ 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).

(11) Streamlining—CZMA¹⁶

By the signature below, China Telecom certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁷

¹⁶ See 47 C.F.R. § 1.767(k)(4).

¹⁷ See Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of China Telecom, I certify that all of the information contained in this application and Appendix D is true and correct to the best of my knowledge and belief.

China Telecommunications Corporation



Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337 tel
kbressie@hwglaw.com

*Counsel for China Telecommunications
Corporation*

Xiao Wei
Deputy Managing Director
China Telecommunications Corporation
31 Jinrong Street
Xicheng District
Beijing, 100033 China
+(852) 2582 5878
xiaowei@chinatelecomglobal.com

APPENDIX E:

CHINA UNITED NETWORK COMMUNICATIONS GROUP COMPANY LIMITED

China United Network Communications Group Company Limited (“China Unicom”) is a Chinese corporation with its principal place of business in Beijing, China. China Unicom provides fixed-line telephone services, broadband and other Internet-related services, business and data communications services, and international voice and data services. China Unicom is a joint licensee for the Trans-Pacific Express submarine cable system.¹ Its U.S. subsidiary, China Unicom USA Corporation, holds two international section 214 authorizations from the Commission.² The Chinese Government owns 96.5 percent of China Unicom through the State-Owned Assets Supervision and Administration Commission of the State Council of China.

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

(1) Applicants’ Names, Addresses, and Telephone Numbers³

China United Network Communications Group Company Limited
No. 21 Financial Street
Xicheng District
Beijing, China 100033
+86 101 0010

(2) Applicants’ Places of Incorporation⁴

China Unicom is a corporation organized under Chinese law.

¹ *Actions Taken Under Cable Landing License Act*, Public Notice, 23 FCC Rcd. 227 (2008).

² *See* FCC File Nos. ITC-214-20020724-00427, ITC-214-20020728-00361.

³ *See* 47 C.F.R. § 1.767(a)(1).

⁴ *See id.* § 1.767(a)(2).

(3) Contact Information⁵

XIAO Yan Min
Project Manager
China United Network Communications Group Company Limited
No. 21 Financial Street
Xicheng District
Beijing, China 100033
+86 10 66259009
ymxiao@chinaunicom.cn

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for China United Network Communications Group Company Limited

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶

By the signature below, China Unicom certifies to the following. China Unicom has one 10-percent-or-greater direct or indirect interest holder:

Government of the People's Republic of China

State-Owned Assets Supervision and Administration Commission of the State Council of China

Address: #26, XuanWuMenXi Street, XuanWu District, Beijing, China 100053

Citizenship: China

Principal Business: government

Relationship: The Chinese Government directly owns 96.5 percent of China Unicom.

The following corporate officers and directors of China Unicom are also officers or directors of other foreign carriers:

⁵ See *id.* § 1.767(a)(3).

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

LU Yimin

Position with China Unicom: President

Position with China United Network Communications Co. Ltd: President

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁷

By its signature below, China Unicom certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁸

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁹

By the signature below, China Unicom certifies that it:

- (A) is a foreign carrier in China;
- (B) owns or controls cable stations in China;
- (C) is affiliated with foreign carriers in Australia, China, Hong Kong, Japan, Singapore, and the United Kingdom, one of which owns or controls a cable landing station, as listed in Table 1 below.

TABLE 1: AFFILIATED FOREIGN CARRIERS

Entity	Country	Owns/Controls Cable Landing Station? Y/N
China Unicom (Australia) Operations Pty Limited	Australia	N
China Mobile Limited (“CML”)’s foreign carrier subsidiaries (“CML Foreign Carrier Subsidiaries”)	China, and others—see CMI appendix to this application	N

⁷ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁸ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4181, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4789, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁹ See 47 C.F.R. § 1.767(a)(8)(ii).

Entity	Country	Owns/Controls Cable Landing Station? Y/N
China Satellite Communications Co. Ltd.	China	N
China Telecommunications Corporation (“China Telecom”), including its foreign carrier subsidiaries	China and others—see China Telecom appendix to this application	Y
China United Network Communications Corporation Limited	China	N
China Mobile International Limited (“CMI”), including its foreign carrier subsidiaries	Hong Kong and others—see CMI appendix to this application	Y
China Unicom (Hong Kong) Operations Limited	Hong Kong	N
China Unicom (Japan) Operations Corporation	Japan	N
China Unicom (Singapore) Operations Pte Limited	Singapore	N
China Unicom (Europe) Operations Limited	United Kingdom	N

Although China Unicom is under common control with China Telecom, CML, CMI, and their subsidiaries due to their ultimate common ownership by the Chinese Government, these companies are structurally and legally separate and operate independently of each other. They have separate directors, management, and employees and deal with each other on a strictly arm’s length basis. Indeed, these companies and their operating subsidiaries compete vigorously with each other, and China Unicom enjoys no legal or practical advantage over other competitive carriers in obtaining interconnection and related services from China Telecom, CML, CMI, or their subsidiaries.

China Unicom has no first-hand knowledge of or access to information about the investments and operations of China Telecom, CML, CMI, or their subsidiaries. For more detailed and accurate information about the subsidiaries of China Telecom, CML, and CMI—and to avoid unnecessary duplication in the appendices to this cable landing license application—please see the China Telecom and CMI appendices to this application.

(7) Certification Regarding Destination Countries¹⁰

By the signature below, China Unicom certifies to the following:

- (A) it is a foreign carrier in China, one of the four foreign destination markets in which the NCP system will land;
- (B) it controls the foreign carriers in China and Japan listed in part I(6) above;
- (C) except for other carriers under the common control of the Chinese Government described in part I(6), no entity owning more than 25 percent of China Unicom or controlling it controls a foreign carrier in China, Japan, Korea, or Taiwan; and
- (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, and/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 arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the NCP system in the United States.

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹¹

By its signature below, China Unicom certifies that China and Japan, the countries identified above in response to 47 C.F.R. § 1.767(a)(8), are members of the World Trade Organization¹²

¹⁰ See *id.* § 1.767(a)(8)(iii).

¹¹ See *id.* § 1.767(a)(8)(iv).

¹² See List of WTO Members and Observers (as of April 26, 2015), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

(9) Certification Regarding Routine Conditions¹³

By the signature below, China Unicom certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹⁴

China Unicom requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3). China Unicom is a foreign carrier in China with a greater-than-fifty-percent market share in China's international transport and/or local access market/is affiliated with a foreign carrier with a greater-than-fifty-percent market share in China's international transport and/or local access market. As noted in part I(8) above, China is a WTO member. China Unicom agrees to accept and abide by the reporting requirements set forth in 47 C.F.R. § 1.767(l).

(11) Streamlining—CZMA¹⁵

By the signature below, China Unicom certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁶

¹³ See 47 C.F.R. § 1.767(a)(9).

¹⁴ See *id.* § 1.767(j), (k).

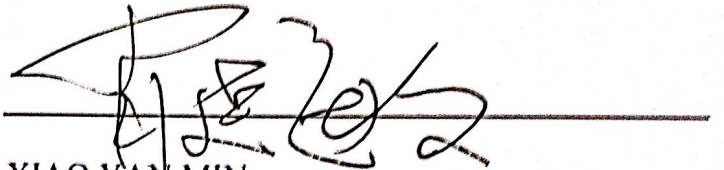
¹⁵ See *id.* § 1.767(k)(4).

¹⁶ See Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of China Unicom, I certify that all of the information contained in this application and Appendix E is true and correct to the best of my knowledge and belief.

**China United Network Communications
Group Company Limited**



XIAO YAN MIN
Project Manager
China United Network Communications Group
Company Limited
No. 21 Financial Street
Xicheng District
Beijing, China 100033
+86 10 6625 9009
ymxiao@chinaunicom.cn

Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

*Counsel for China United Network
Communications Group Company Limited*

APPENDIX F:
CHUNGHWA TELECOM CO., LTD.

Chunghwa Telecom Co., Ltd. (“Chunghwa Telecom”) is a corporation organized under Taiwanese law with its principal place of business in Taipei. As an integrated telecommunications service provider, Chunghwa Telecom’s principal services include fixed-line services, including local, domestic long distance and international long distance telephone services, wireless services, including cellular and paging services, and Internet and data services, asymmetrical digital subscriber line services, and leased line services. Chunghwa Telecom, along with other members of the Trans-Pacific Express submarine cable consortium, holds a submarine cable landing license.¹ Chunghwa Telecom’s U.S. subsidiary, Chunghwa Telecom Global, Inc., holds an international Section 214 authorization from the Commission.²

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

(1) Applicants’ Names, Addresses, and Telephone Numbers³

Chunghwa Telecom Co., Ltd.
21-3, Section 1, Hsinyi Road
Taipei 100, Taiwan (R.O.C)
+886 2 23443601

(2) Applicants’ Places of Incorporation⁴

Chunghwa Telecom is a corporation organized under the laws of Taiwan.

¹ *Actions Taken Under Cable Landing License Act*, Public Notice, 23 FCC Rcd. 227 (2008).

² See FCC File No. ITC-214-20020424-00197.

³ See 47 C.F.R. § 1.767(a)(1).

⁴ See *id.* § 1.767(a)(2).

(3) Contact Information⁵

Wu-Tien Lin
Director
Chunghwa Telecom Co., Ltd.
31, Aikuo East Road,
Taipei 106, Taiwan (R.O.C)
+886 2 23445280
wtlin@cht.com.tw

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for Chunghwa Telecom Co., Ltd.

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶

By the signature below, Chunghwa Telecom certifies to the following. Chunghwa Telecom has one 10-percent-or-greater direct or indirect interest holder:

Government of Taiwan

Ministry of Transportation and Communications (“MOTC”)

Address: 50, Sec. 1, Ren-ai Rd., Jhongjheng District, Taipei, Taiwan

Citizenship: Taiwan

Principal Business: government

Relationship: The Taiwanese Government through the MOTC directly owns 35.29 percent of Chunghwa Telecom.⁷

⁵ See *id.* § 1.767(a)(3).

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

⁷ In addition to the shares held through MOTC, the Government of Taiwan through other entities holds an additional 4.61 percent of Chunghwa Telecom’s shares, bringing the total interest of the Taiwanese Government to 39.9 percent, as of March 31, 2015.

Chunghwa Telecom’s shares trade publicly on the Taiwan Stock Exchange Corporation under the code “2412,” and its American depository shares—worth 10 common shares—are traded on the New York Stock Exchange under the symbol “CHT.” As there is an active market in Chunghwa Telecom’s shares, Chunghwa Telecom’s share ownership is fluid. Moreover, Chunghwa Telecom can ascertain its significant shareholders only on the basis of its stock records and SEC reports and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations, as of the most recent measurable date, March 31, 2015, no other individual or entity other than the Taiwanese Government owns 10 percent or more of Chunghwa Telecom’s shares.

The following corporate officers and directors of Chunghwa Telecom are also officers or directors of other foreign carriers:

Yuan-Kuang Tu

Position with Chunghwa Telecom: President of Business Group

Position with Chunghwa Telecom Singapore Pte., Ltd.: Chairman

Position with Donghwa Telecom Co., Ltd.: Chairman

Chih-Cheng Chien

Position with Chunghwa Telecom: Vice President

Position with Chunghwa Telecom Global, Inc.: Chairman

Position with Chunghwa Telecom Japan Co., Ltd: Chairman

Jung-Kuei Chen

Position with Chunghwa Telecom: Managing Director

Position with Chunghwa Telecom Global, Inc.: Director of the Board

Ying-Ming Wu

Position with Chunghwa Telecom: Managing Director

Position with Chunghwa Telecom Japan Co., Ltd: President

Position with Donghwa Telecom Co., Ltd.: Director of the Board

Horng-Jang Wu

Position with Chunghwa Telecom: Managing Director

Position with Donghwa Telecom Co., Ltd.: Director of the Board

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁸

By its signature below, Chunghwa Telecom certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁹

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations¹⁰

By the signature below, Chunghwa Telecom certifies that it:

- (A) is a foreign carrier in Taiwan;
- (B) owns/controls Tanshui, Toucheng, Fangshan and Kinmen Kinchung cable stations in Taiwan;
- (C) is affiliated with foreign carriers in Hong Kong, Japan, Singapore, and Taiwan, none of which owns or controls a cable landing station, as listed in Table 1 below.

TABLE 1: AFFILIATED FOREIGN CARRIERS

Entity	Country	Owns/Controls Cable Landing Station? Y/N
Donghwa Telecom Co., Ltd	Hong Kong	N
Chunghwa Telecom Japan Co., Ltd.	Japan	N
Chunghwa Telecom Singapore Pte., Ltd.	Singapore	N

(7) Certification Regarding Destination Countries¹¹

By the signature below, Chunghwa Telecom certifies to the following:

⁸ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁹ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4181, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4789, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

¹⁰ See 47 C.F.R. § 1.767(a)(8)(ii).

¹¹ See *id.* § 1.767(a)(8)(iii).

- (A) it is a foreign carrier in Taiwan, one of the four foreign destination markets in which the NCP system will land;
 - (B) it controls the foreign carriers in Japan and Taiwan, as described in part I(6) above;
 - (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in China, Japan, Korea, or Taiwan; and
 - (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, and/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 arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the NCP system in the United States.
- (8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹²**

By its signature below, Chunghwa Telecom certifies that Japan and Taiwan, the countries identified above in response to 47 C.F.R. § 1.767(a)(8), are members of the World Trade Organization.¹³

¹² See *id.* § 1.767(a)(8)(iv).

¹³ See List of WTO Members and Observers (as of April 26, 2015), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm. Taiwan became a full Member of the WTO effective January 1, 2002, under the official name “Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu,” or “Chinese Taipei.”

(9) Certification Regarding Routine Conditions¹⁴

By the signature below, Chunghwa Telecom certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹⁵

Chunghwa Telecom requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3). Chunghwa Telecom has a greater-than-fifty-percent market share in each of the international transport and local access markets of Taiwan.¹⁶ As noted in part I(8) above, Taiwan is a WTO member. Chunghwa Telecom agrees to accept and abide by the reporting requirements set forth in 47 C.F.R. § 1.767(l).

¹⁴ See 47 C.F.R. § 1.767(a)(9).

¹⁵ See *id.* § 1.767(j), (k).

¹⁶ 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).

(11) Streamlining—CZMA¹⁷

By the signature below, Chunghwa Telecom certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁸

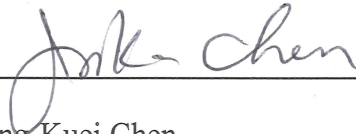
¹⁷ See 47 C.F.R. § 1.767(k)(4).

¹⁸ See Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of Chunghwa Telecom, 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.

Chunghwa Telecom Co., Ltd.



Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337 tel
kbressie@hwglaw.com

Jung-Kuei Chen
Managing Director Chunghwa Telecom Co., Ltd.
31, Aikuo East Road,
Taipei 106, Taiwan (R.O.C)
+886 2 23443912
jkchen@cht.com.tw

Counsel for Chunghwa Telecom Co., Ltd.

APPENDIX G:
KT CORPORATION

KT Corporation (“KT”) is an integrated telecommunications services provider in the Republic of Korea. KT is a corporation organized under the laws of the Republic of Korea with its principal place of business in Seongnam City. The company’s services include telephone services (local, domestic long distance and international long distance fixed-line telephone services, mobile services and interconnection services to other telecommunications companies), broadband Internet access service and other Internet-related services, and various other services, including leased line service and other data communication service, and network integration service. KT is a joint licensee for the Trans-Pacific Express submarine cable system.¹ Its U.S. subsidiary, Korea Telecommunication, Inc., holds an international Section 214 authorization from the Commission.²

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

(1) Applicants’ Names, Addresses, and Telephone Numbers³

KT Corporation

90 Bulljeong-ro (206 Jungja-dong), Bundang-gu
Seongnam-city, GyeongGi-Do, 463-711, Korea
+ 82-31-390-7111

(2) Applicants’ Places of Incorporation⁴

KT is a corporation organized under the laws of the Republic of Korea.

¹ *Actions Taken Under Cable Landing License Act*, Public Notice, 23 FCC Rcd. 227 (2008).

² *See* FCC File No. ITC-214-19990412-00281.

³ *See* 47 C.F.R. § 1.767(a)(1).

⁴ *See id.* § 1.767(a)(2).

(3) Contact Information⁵

Mr. Yisoo KIM
Senior Manger
KT Corporation
206 Jungja-dong, Bundang-gu
Seongnam-city, Kyeonggi-do, 463-711, Korea
+82 31 727 0415
Yisoo.kim@kt.com

with a copy to:

Kent Bressie
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Counsel for KT Corporation

(4) Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates⁶

By the signature below, KT certifies that the following information is true and correct to the best of its knowledge as of the signature date of this application appendix. KT has no 10-percent-or-greater shareholders. KT's shares trade publicly on the Korea Exchange under the code "030200," on the New York Stock Exchange under the symbol "KT," and on the London Stock Exchange under the symbol "KTCD." As there is an active market in KT's shares, KT's share ownership is fluid. Moreover, KT can ascertain its significant shareholders only on the basis of its stock records and SEC reports and may not know of possibly related or affiliated shareholders that are not disclosed to it. Recognizing these limitations, as of the most recent

⁵ See *id.* § 1.767(a)(3).

⁶ See *id.* §§ 1.767(a)(8)(i), 63.18(h).

measurable date, no individual or entity owns 10 percent or more of KT's shares. The Korean Government has no equity interest in KT.

KT has no interlocking directorates.

(5) Certification Regarding the Anti-Drug Abuse Act of 1988⁷

By its signature below, KT certifies that no party to this application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.⁸

(6) Certification Regarding Foreign Carrier Status and Foreign Affiliations⁹

By the signature below, KT certifies that it:

- (A) is a foreign carrier in Korea;
- (B) owns and controls cable stations in Busan and Geoje, Korea;
- (C) is affiliated with foreign carriers in China, Japan, Korea, Poland, Rwanda, and Uzbekistan, none of which own or control a cable landing station, as listed in Table 1 below.

⁷ See *id.* §§ 1.767(a)(8)(i), 63.18(o).

⁸ 21 U.S.C. § 862(a). Pub. L. 100-690, title V, Section 5301 (Nov. 18, 1988), 102 Stat. 4181, which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, Section 1002(d)(1) (Nov. 29, 1990), 104 Stat. 4789, and has been recodified as 21 U.S.C. § 862(a). 47 C.F.R. § 63.18(o) does not reflect this recodification.

⁹ See 47 C.F.R. § 1.767(a)(8)(ii).

TABLE 1: AFFILIATED FOREIGN CARRIERS

Entity	Country	Owns/Controls Cable Landing Station? Y/N
KT Powertel Co., Ltd.	Korea	N
KT Sat Co., Ltd.	Korea	N
olleh Rwanda Networks Ltd.	Rwanda	N
Korea Telecom Japan Co., Ltd.	Japan	N
Korea Telecom China Co., Ltd.	China	N
Super iMax LLC	Uzbekistan	N
East Telecom LLC	Uzbekistan	N
KBTO sp.zo.o.	Poland	N

(7) Certification Regarding Destination Countries¹⁰

By the signature below, KT certifies to the following:

- (A) it is a foreign carrier in Korea, one of the four foreign destination markets in which the NCP system will land;
- (B) it controls foreign carriers in China, Japan, and Korea, as described in part I(6) above;
- (C) no entity owning more than 25 percent of it or controlling it controls a foreign carrier in China, Japan, Korea, or Taiwan; and
- (D) no grouping of two or more foreign carriers in China, Japan, Korea, or Taiwan (or parties that control foreign carriers in China, Japan, Korea, and/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 arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the NCP system in the United States.

¹⁰ See *id.* § 1.767(a)(8)(iii).

(8) Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets¹¹

By its signature below, KT certifies that China, Japan, and Korea, the countries identified above in response to 47 C.F.R. § 1.767(a)(8), are members of the World Trade Organization.¹²

(9) Certification Regarding Routine Conditions¹³

By the signature below, KT certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Streamlining—Market Power¹⁴

KT requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(3). KT has a greater-than-fifty-percent market share in each of the international transport and local access markets in Korea.¹⁵ As noted in part I(8) above, Korea is a WTO member. KT agrees to accept and abide by the reporting requirements set forth in 47 C.F.R. § 1.767(l).

(11) Streamlining—CZMA¹⁶

By the signature below, KT certifies that it is not required to submit a consistency certification to any state pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Oregon, the only U.S. state in which the NCP

¹¹ See *id.* § 1.767(a)(8)(iv).

¹² See List of WTO Members and Observers (as of April 26, 2015), http://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm.

¹³ See 47 C.F.R. § 1.767(a)(9).

¹⁴ See *id.* § 1.767(j), (k).

¹⁵ 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).

¹⁶ See 47 C.F.R. § 1.767(k)(4).

system will land, does not list, and has never proposed to list, a cable landing license as a federal activity requiring a consistency certification.¹⁷

¹⁷ See Oregon Department of Land Conservation and Development, Federal Activities, Licenses and Permits Which Must Be Certified for Consistency with the Oregon Coastal Management Program, www.oregon.gov/LCD/OCMP/docs/General/Federal_Consistency_Table_7.pdf; National Oceanic and Atmospheric Administration, Coastal Zone Management Program, Oregon's Listed Federal Actions, <http://coast.noaa.gov/czm/consistency/media/or.pdf>.

CERTIFICATION

On behalf of KT, 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 as of the date of signing this application appendix.

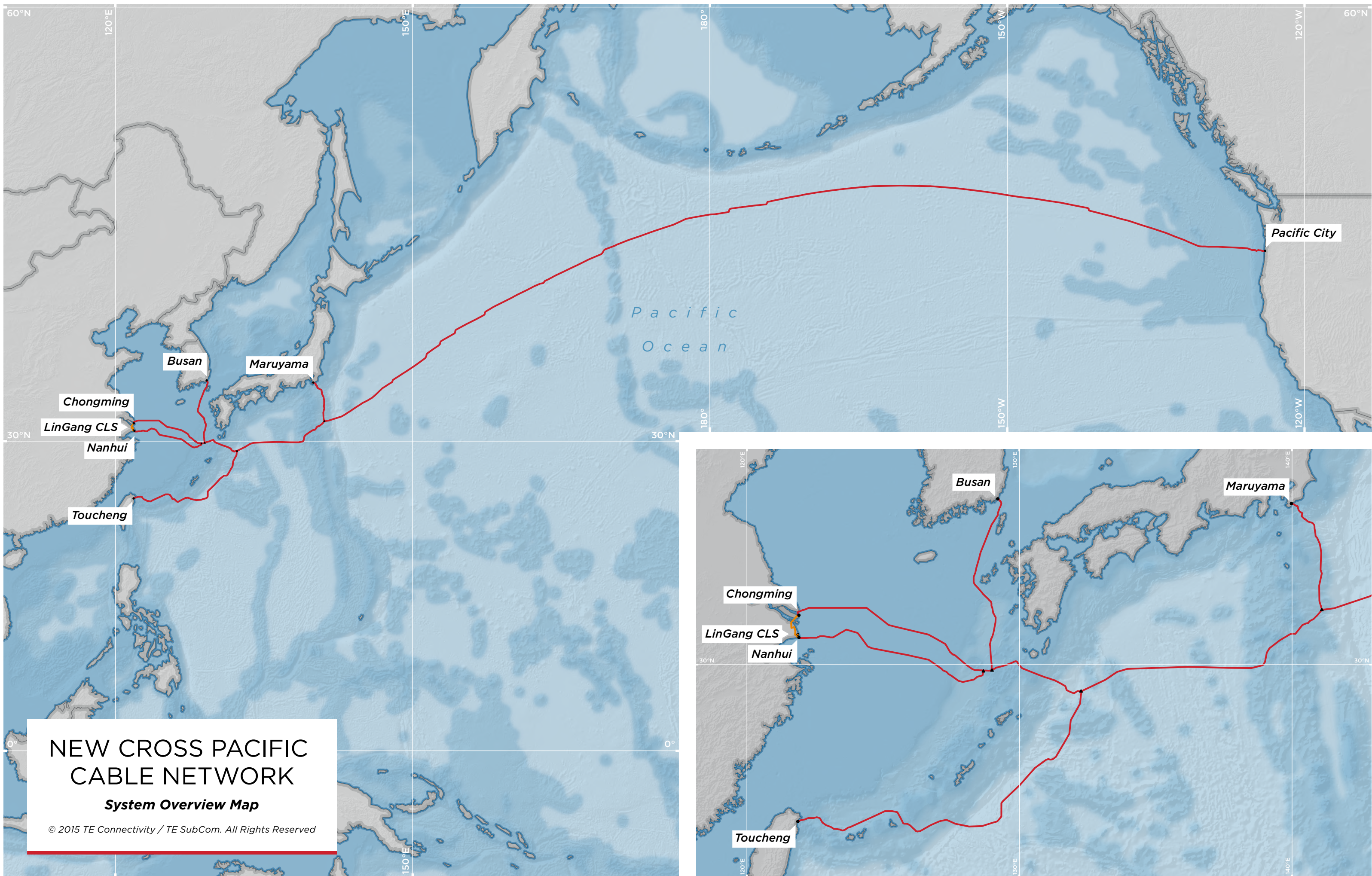
KT Corporation

A handwritten signature in black ink, appearing to read 'Kiyong KO', written over a horizontal line.

Kent Bressie
Danielle Piñeres
Harris, Wiltshire & Grannis LLP
1919 M Street, N.W., Suite 800
Washington, D.C. 20036-3537
+1 202 730 1337
kbressie@hwglaw.com

Mr. Kiyong KO
Vice President
KT Corporation
90 Bulljeong-ro (206 Jungja-dong), Bundang-gu
Seongnam-city, GyeongGi-Do, 463-711, Korea
+82-31-727-0415
kiyoung.ko@kt.com

Counsel for KT Corporation



NEW CROSS PACIFIC CABLE NETWORK

System Overview Map

© 2015 TE Connectivity / TE SubCom. All Rights Reserved