

25 January 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Seabras 1 USA, LLC, Application for a Cable Landing License for the Seabras-1 Submarine Cable System, File No. SCL-LIC-20160115-00002

Dear Ms. Dortch:

Seabras 1 USA, LLC (“Seabras 1 USA”) hereby responds to the questions of International Bureau staff emailed to the undersigned counsel on January 21, 2016.

1. *What is the length (km) of the Seabras-1 cable?*

The Seabras-1 system totals approximately 10,806 kilometers in length

2. *Has construction on the cable begun, or when is it slated to begin?*

Construction on Seabras-1 has already commenced outside of U.S. territory.

3. *Are there any other owners (other than Larry Schwartz) of Seaborn Network Holdings, LLC that have a 10% or greater indirect equity or voting interest in Seabras Group and Seabras 1 USA?*

No. As certified in part I.H of the cable landing license application, Mr. Schwartz is the only owner of Seaborn Network Holdings, LLC, who holds a 10-percent-or-greater indirect equity or voting interest in Seabras Group or Seabras 1 USA.

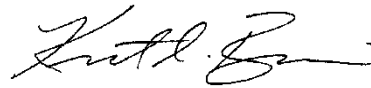
4. *Please state that “No other individual or entity owns 10 percent or more of the shares of either Seabras Group or Seabras 1 USA.”*

No entity or individual—other than those specifically identified in part I.H of the cable landing license application—holds a 10-percent-or-greater indirect equity or voting interest in Seabras Group or Seabras 1 USA.

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Should you have any questions concerning this letter, please contact me by telephone at +1 202 730 1337 or by e-mail at kbressie@hwglaw.com.

Respectfully submitted,



Kent D. Bressie

Counsel for Seabras 1 USA, LLC

cc: Jodi Cooper
David Krech

DECLARATION OF ANDY BAX

I, Andy Bax, Chief Operating Officer of Seabras 1 USA, LLC, have reviewed the accompanying letter and declare under penalty of perjury under the laws of the United States of America that the information contained therein is true and correct.

Executed 25 January 2016



Andy Bax