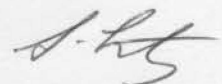


Exhibit C

DECLARATION OF STEPHEN LENTZ

I, Stephen Lentz, Director of Network Development at Ocean Specialists, Inc. ("OSI"), make the following declaration and declare under penalty of perjury under the laws of the United States of America that the information contained therein is true and correct.

1. I make this declaration in support of the application of DOCOMO Pacific, Inc., for a license to land and operate a private fiber-optic submarine cable system connecting Guam with Saipan, Rota, and Tinian in the Commonwealth of the Northern Mariana Islands (CNMI), file no. SCL-LIC- 20160314-00008.
2. DOCOMO Pacific has retained OSI for its expert assistance in planning the proposed Atisa submarine cable network. As part of that planning process, OSI worked with NEC Corporation ("NEC"), DOCOMO Pacific's cable system supplier, to produce a table of cable crossings affecting IT&E's Mariana-Guam cable (attached as Exhibit A) and a map of the submarine cables near Guam and the CNMI (attached as Exhibit D). The attached exhibits are true and correct copies of those documents.
3. In planning the Atisa route, OSI determined that it would be necessary to cross IT&E's Mariana-Guam cable in order to provide services to each of the islands in the CNMI. Because the east sides of the islands are unsuitable for cable landings due to both geology and weather patterns, Atisa must be laid on the west side of the islands. Atisa's pathway is further constrained by presence of an offshore explosives dumping ground and an offshore seamount near the CNMI. Because IT&E's cable runs close to the shore of each island, Atisa must be situated west of the Mariana-Guam cable and therefore must cross over the Mariana-Guam cable to reach the islands of Rota and Tinian, as shown in Exhibit B.



4. As part of the planning process, OSI and DOCOMO Pacific staff attempted to begin informal coordination with IT&E by requesting information about the exact location of IT&E's cables. Thomas T. Higa, Chief Commercial Officer of DOCOMO Pacific, contacted IT&E's Chief Operating Officer with that request on or about March 14, 2016. The first response to that informal request was an email from IT&E with the cable route information May 13, 2016, after IT&E's supplemental filing to the FCC.
5. DOCOMO Pacific, OSI, and NEC also worked through the standard International Cable Protection Committee ("ICPC") process to prepare ICPC Agreement to Cross Notifications for the Atisa system. These notifications generally mark the beginning of crossing negotiations, during which operators may reach agreements on a variety of technical means for preventing damage to existing cables. To date, NEC has received acceptances of these crossing notifications from the operators of the China-US, Guam-Philippines, Asia-American Gateway, TPC-1, TPC-2 and TPC-5 cables.
6. As IT&E explained in its supplemental filing, it received these notifications from ICPC on May 6, 2016. IT&E did not respond to those notifications until May 20, 2016. The ICPC procedures and recommendations are generally observed and implemented by the submarine cable industry, and IT&E's decision to involve the Federal Communications Commission before responding to the ICPC Agreement to Cross Notifications related to Atisa is, in OSI's experience, anomalous.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed 25th May 2016


Stephen Lentz