

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

<i>In the Matter of</i>)	
)	
Quintillion Subsea Operations, LLC)	
)	
Application for a License to Construct, Land and Operate a Private Fiber Optic Cable System Linking Points Within Alaska, and Request for Streamlined Treatment)	File No. SCL-LIC-2016 _____
)	
Quintillion Subsea Cable System)	

**APPLICATION FOR CABLE LANDING LICENSE –
REQUEST FOR STREAMLINED TREATMENT**

Quintillion Subsea Operations, LLC (“Quintillion” or the “Company”), by its attorneys and pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (the “Act”), Executive Order No. 10530, reprinted as amended in 3 U.S.C. § 301, and Section 1.767 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 1.767, hereby requests authority to construct, land and operate a multi-stage high capacity fiber optic cable system, wholly within the United States extending between Nome, Alaska and Prudhoe Bay, Alaska (the “Quintillion Subsea Cable System” or the “Quintillion System”).¹ The Quintillion Subsea Cable System is the first stage of a larger submarine cable system that the Company intends will, in later stages, land in foreign points, but the Quintillion System will be a complete system unto itself touching only United States soil. Sections of the Quintillion Subsea Cable System cables will be laid outside of U.S.

¹ Quintillion plans, in the future, to extend the cable system to international points and will, at that time, seek required authorization. This Application seeks approval solely for the portion of the cable system connecting points within Alaska.

territorial waters albeit still close to Alaska but will not, as part of this first stage, connect to any foreign points. Quintillion hereby seeks Commission authority to construct, land and operate the Quintillion Subsea Cable System as described herein. Quintillion seeks streamlined review of this Application consistent with Section 1.767(k) of the Commission's rules, 47 C.F.R. § 1.767(k). At such time as the Company plans to expand the system beyond the landing points described herein, Quintillion will request additional authority from the Commission as required under the Act and the Commission's Rules.

I. BACKGROUND

The Quintillion Subsea Cable System will be a private, non-common carrier fiber optic cable system linking Nome, Alaska and Prudhoe Bay, with six Alaskan landing stations in Nome, Kotzebue, Point Hope, Wainwright, Barrow, and Prudhoe Bay.

Quintillion's Subsea Cable System will provide the coastal communities of north and northwest Alaska with fiber-based high capacity communications utilizing connections with other carriers and providers at each landing site. Quintillion will provide communications capabilities to other middle and last mile telecommunications providers and internet service providers ("ISP") on a private carrier basis.

Quintillion seeks to have the Quintillion Subsea Cable System fully constructed by October 2016 and operational by first quarter 2017. The construction season at the latitudes discussed herein is extremely short due to marine mammal migrations and seasonal ice and lasts only from approximately mid-May to mid-October each year. Moreover, a key prerequisite to construction is the transportation of the cable and materials to Alaskan waters. The first vessel carrying the cable to the Alaskan waters is scheduled to leave port in France by April 18, 2016, in order to be in position in a timely manner, given other commitments of the contractor, by the beginning of the construction window in early-to-mid June 2016. The entire 2016 construction

season will be needed for Quintillion and its supply contractor to complete construction before the end of the 2016 construction season. Consequently, Quintillion requests Commission grant of the Application by April 18, 2016 at the latest, to allow it to meet its Q1 2017 coming-into-service target date. If the license grant is later than April 18, 2016, Quintillion runs the very real risk of not completing construction and having the Quintillion Subsea Cable System become operational in a timely fashion. A later grant creates the very real potential to delay the coming-into-operation date until the third quarter of 2017, at the earliest, if not considerably longer, thereby postponing the introduction to the intended Alaskan markets of a new, competitive source of affordable, high capacity telecommunications.

Grant of this Application will advance the public interest. The Quintillion Subsea Cable System will be the first submarine cable connecting the six proposed landing station points, and the first fiber optic cable to five of these landings, bringing a new source of reliable, secure, high-speed communications capability to these north and northwest Alaskan communities which other providers will be able to utilize, to provide their broadband and other services. Businesses and consumers ultimately will benefit from their carrier's and ISP's access to the enhanced capacity and reliability on this new cable system. Moreover, the addition of the Quintillion Cable System will add redundancy to telecommunications infrastructure, such as terrestrial fiber at Prudhoe Bay and microwave systems and satellite links, connecting these communities in Alaska and reducing the potential for communications failures during natural or other disasters.

In support of this Application, Quintillion submits the following information:

II. INFORMATION REQUIRED BY SECTION 1.767

1. Name, address and telephone number:²

Quintillion Subsea Operations, LLC
201 East 56th Avenue
Suite 300
Anchorage, AK 99518
(907) 440-4511

2. The Government, State or Territory under the laws of which each corporate or partnership applicant is organized:³

Quintillion is a limited liability company formed under the laws of the State of Delaware.

3. The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed⁴

Elizabeth Pierce
Chief Executive Officer
Quintillion Subsea Operations, LLC
201 East 56th Avenue
Suite 300
Anchorage, AK 99518
(907) 440-4511

With copies to:

Adam Murphy
Managing Director
Cooper Investment Partners
1633 Broadway
18th Floor
New York, NY 10019
(212) 275-2800

and

Edward A. Yorkgitis, Jr.
Denise N. Smith

² See 47 C.F.R. § 1.767(a)(1).

³ See 47 C.F.R. § 1.767(a)(2).

⁴ See 47 C.F.R. § 1.767(a)(3).

Kelley Drye & Warren LLP
Washington Harbour, Suite 400
3050 K Street, NW
Washington, D.C. 20007-5108
(202) 342-8540

4. A description of the submarine cable, including the type and number of channels and the capacity thereof:⁵

Quintillion's Subsea Cable System will be deployed as a trunk and branch configuration with landings into Nome, Kotzebue, Point Hope, Wainwright, Barrow, and Prudhoe Bay, all points within Alaska. Sections of the cable will be laid outside of U.S. territorial waters, but Quintillion is not seeking authority to connect to any foreign points at this time. The five landings in Alaska will be backhauled to Prudhoe Bay where the initial power source for the Quintillion Subsea Cable System will be located. The Quintillion System will interface with a state-of-the-art broadband terrestrial fiber system extending from Prudhoe Bay to Fairbanks, Alaska, which, in turn, connects to existing third-party fiber-based networks that provide access to the worldwide web via PoPs in Anchorage, Hillsboro and Seattle. This Quintillion Subsea Cable System will span over 1176 miles and deploy advanced coherent multi-terabit technology with optical add-drop multiplexing capabilities. The Quintillion System will utilize dense wavelength-division multiplexing and will be comprised of three (3) fiber pairs, each with an initial capacity of 10 terabits-per-second (10Tb/s).⁶ All segments of the Quintillion Subsea Cable System are designed to initially carry up to 100 wavelengths at 100 Gb/s and the system will be monitored and controlled from a network management system permitting

⁵ See 47 C.F.R. § 1.767(a)(4).

⁶ Quintillion anticipates using two of the fiber pairs to operate and provide redundancy between the six planned landing sites. In the near term, Quintillion may connect the third pair back to Nome and Prudhoe Bay to enable Quintillion to monitor the status and condition of this fiber pair, but long-term this fiber pair will be reserved for future use.

preventive maintenance and external fault localization. The Quintillion System is designed to provide a resilient network by use of features including extra repeaters, parallel, redundant equipment, enhanced emergency power, horizontal directional drilling to install conduit in shallows near shore to protect cable and buried spur and backbone cables where required to avoid identified external risks such as fishing or ice gouging.

As noted above, it is anticipated that the Quintillion System is the first stage in a submarine cable system that will connect Japan and Western Europe, with intermediate landings, not only in Alaska, but Canada as well. The Quintillion Subsea Cable System is being configured to facilitate that eventual expansion, for which approval is *not* being sought from the Commission now. The complete backbone cable of the contemplated expanded system will be over 5,600 miles long and provide ultra-low-latency connectivity.

5. A specific description of the cable landing stations on the shore of the United States and in foreign countries where the cable will land:⁷

The Quintillion Subsea Cable System will be comprised of eleven (11) segments totaling 1176 miles and will land at six locations, all within Alaska: Prudhoe Bay (Oliktok Point), Barrow, Wainwright, Point Hope, Kotzebue and Nome. Details, including geographic coordinates and street addresses, for the cable landing stations and beach manholes are discussed in greater detail *infra*.

The Quintillion System's eleven segments, all of which are located within or near Alaskan waters and on the Alaskan coast, are as follows:

⁷ See 47 C.F.R. § 1.767(a)(5).

Segment 1: connecting the Prudhoe Bay cable landing station to the first branching unit (BU1) which is located off the coast of Alaska north of Oliktok Point;

Segment 2: connecting BU1 to the second branching unit (BU2) which is located off the coast of Alaska northwest of Barrow;

Segment 3: connecting the Barrow cable landing station to BU2;

Segment 4: connecting BU2 to the third branching unit (BU3) which is located off the coast of Alaska northwest of Wainwright;

Segment 5: connecting the Wainwright cable landing station to BU3;

Segment 6: connecting BU3 to the fourth branching unit (BU4) which is located off the coast of Alaska southwest of Point Hope;

Segment 7: connecting the Point Hope cable landing station to BU4;

Segment 8: connecting BU4 to the fifth branching unit (BU5) which is located off the coast of Alaska south of Point Hope and Northwest of Kotzebue;

Segment 9: connecting the Kotzebue cable landing station to BU5;

Segment 10: connecting BU5 to the sixth branching unit (BU6) which is located off the coast of Alaska west of Nome; and

Segment 11: connecting the Nome cable landing station to BU6.

In the stage of construction for which authority is being sought, each of the branching units connect only to the other branching units and to cable landing stations. No segment connects to any foreign points at this time. Possible future phases of the Quintillion System may utilize the BU1 and BU6 branching units to connect the Quintillion Subsea Cable System serving Alaska to landing sites in Japan, Canada, and the United Kingdom. Appropriate

authority will be sought from the Commission for future stages of submarine cable system construction.

The Quintillion System will be comprised of three fiber pairs, each with an initial capacity of 10 terabits-per-second (10Tb/s) and all segments of the Quintillion Subsea Cable System are designed to initially carry up to 100 wavelengths at 100 Gb/s. Current plans for the Quintillion Cable System anticipate that two of the fiber pairs will be used to operate on each of the segments described above and provide redundancy between the six planned landing sites in Alaska. The third fiber pair will be reserved for future use; it will land in Alaska and, in the near term, may be connected to the Nome and Prudhoe Bay cable landing stations to enable Quintillion to monitor the status and condition of this fiber pair.

Following are the coordinates and addresses of the proposed Quintillion Subsea Cable System landing stations and coordinates and location descriptions for the beach manholes (BMH).

- a. **Prudhoe Bay (Oliktok Point):** The Prudhoe Bay cable landing station will be located in a new building adjacent to the Seawater Treatment Plant owned and operated by oil company ConocoPhillips and physically located at Oliktok Point.

Street Address: ConocoPhillips Pad at Milne Point Rd,
Prudhoe Bay, AK 99734

Coordinates: Latitude N 70 30' 39.20"
Longitude W 149 52' 11.80"

The Prudhoe Bay beach manhole will be located at the Conoco-Phillips Seawater Treatment Plant (STP) located at Oliktok Point. The BMH will be located approximately 200 feet to the west of the STP facility on the STP pad.

Street Address: Milne Point Rd, Prudhoe Bay, AK 99734

Coordinates: Latitude N 70 30' 39.20"
Longitude W 149 52' 11.80"

- b. **Barrow:** The Barrow cable landing station will be installed in a building located next to existing ILEC facilities at:

Street Address: 1085 Kiogak Street, Barrow, AK 99723

Coordinates: Latitude N 71 16' 30.43"
Longitude W 156 48' 22.02"

The Barrow beach manhole will be located approximately one (1) mile south of the Barrow Airport on an Unnamed Road. The BMH site is located on the west side of the road approximately 50 feet from the road.

Street Address: Unnamed Road, Barrow, AK 99723

Coordinates: Latitude N 71 15' 57.49"
Longitude W 156 50' 12.90"

- c. **Wainwright:** The Wainwright cable landing station will be installed in a building located next to existing ILEC facilities at:

Legal Address: Lot 1, Block 26, Wainwright Airport
Addition No. 1, Wainwright, AK 99782

Coordinates: Latitude N 70 38' 09.27"
Longitude W 160 01' 44.75"

The Wainwright beach manhole will be located on the north side of Milikruak Rd approximately 150 feet south of Nashoalook Rd in a vacant lot next to the community playground.

Street Address: Milikruak Rd, Wainwright, AK 99782

Coordinates: Latitude N 70 38' 15.78"
Longitude W 160 02' 04.43"

- d. **Point Hope:** The Point Hope cable landing station will be installed in a building next to existing ILEC facilities at:

Legal Address: Lot 13, Block 11 New Point Hope Townsite,
Point Hope, AK 99766

Coordinates: Latitude N 68 20' 47.59"
Longitude W 166 43' 58.65"

The Point Hope beach manhole will be located 800 feet East of the intersection of Qalgi Ave and Kanuq Street along an unnamed road within the community of Point Hope Alaska.

Street Address: Along unnamed road approximately 800 feet East from the intersection of Qalgi Ave and Kanuq St, Point Hope, AK 99766

Coordinates: Latitude N 68 20' 50.14"
 Longitude W 166 43' 09.11"

- e. **Kotzebue:** The Kotzebue cable landing station will be collocated in a facility of the incumbent local exchange carrier, OTZ Telephone, at:

Street Address: 346 Tundra Way, Kotzebue, AK 99752

Coordinates: Latitude N 66 53' 51.79"
 Longitude W 162 35' 56.28"

The Kotzebue beach manhole will be located on Tundra Way in a vacant housing lot directly across from OTZ Telephone. AT&T's earth station is approximately 100 feet to the SSE and the Nulavik Hotel is approximately 200 feet to the SSW. The lot corners the driveway to the hotel parking lot off of Tundra Way.

Street Address: 365-391 Tundra Way, Kotzebue, AK 99752

Coordinates: Latitude N 66 53' 51.34"
 Longitude W 162 35' 56.97"

- f. **Nome:** The Nome cable landing station will be collocated in a facility of the incumbent local exchange carrier, TelAlaska, at:

Street Address: 245 E Front Street, Nome, AK 99762

Coordinates: Latitude N 64 29' 53.97"
 Longitude W 165 24' 22.62"

The Nome beach manhole will be located on the NE corner of the Nome Bypass and Nome-Council Rds. The BMH is located approximately 150 feet from each road.

Street Address: Nome-Council Rd, Nome, AK 99762

Coordinates: Latitude N 64 29' 11.70"
 Longitude W 165 19' 14.48"

Quintillion has secured the property use rights to all of the beach manhole sites. Quintillion has signed leases for the buildings at Wainwright, Point Hope, Oliktok Pt/Prudhoe and Barrow where the cable landing stations are located. Quintillion's leases for the buildings where the cable landing stations will be located, at Barrow, Wainwright and Point Hope provide Quintillion with full and exclusive access to, and control over, the buildings. Quintillion is nearing completion of the collocation agreements for Nome and Kotzebue.

Pursuant to Commission rule 1.767(a)(5), attached as Attachment A is a map showing specific geographic coordinates including coordinates of any beach joint where those coordinates differ from the coordinates of the cable station

6. A statement as to whether the cable will be operated on a common carrier or non-common carrier basis:⁸

The Quintillion Subsea Cable System will be operated on a non-common carrier basis. Accordingly, a license is requested under the Commission's private submarine cable policy, which is intended to promote competition in the provision of international transmission facilities.⁹

The Commission has expressed a policy of granting non-common carrier designation of submarine cable systems. Indeed, "[s]ince the Commission espoused its private submarine cable policy in the 1985 *Tel-Optik Order*, the Commission has not denied non-common carrier status to a submarine cable applicant that has requested it,"¹⁰ and it has

⁸ See 47 C.F.R. § 1.767(a)(6).

⁹ See *Tel-Optik, Ltd., Memorandum Opinion and Order*, 100 FCC 2d 1033, 1040-42, 1046-48 (1985); see also *Cable & Wireless, plc, Cable Landing License*, 12 FCC Rcd. 8516 (1997).

¹⁰ See *Review of Commission Consideration of Applications under the Cable Landing License Act*, 15 FCC Rcd 20789, 20818-19, ¶ 69 (2000).

expressed the “inten[tion] to continue our private submarine cable policy, in order to further stimulate competition in the market.”¹¹

In considering a request by an applicant to operate a cable system on a non-common carrier basis, the Commission refers to the two-part test set forth in *National Association of Regulatory Utility Commissioners v. FCC*, 525 F.2d 630 (D.C. Cir. 1976) (“*NARUC I*”).¹² Under this test, a submarine cable system may be operated on a non-common carrier basis if: (1) there is no legal compulsion for the carrier to serve the public indifferently; and (2) there is no reason implicit in the nature of the operation of the submarine cable system to expect that the applicant would make capacity available to the public indifferently and indiscriminately.¹³ As explained below, the Quintillion Subsea Cable System meets the criteria for non-common carrier classification.

In applying the first part of the *NARUC I* test, the Commission has stated that there is no legal compulsion to serve the public indifferently where the public interest does not require facilities to be offered on a common carrier basis.¹⁴ This public interest analysis generally has focused on the availability of alternative communications facilities but also emphasizes whether private carrier status will promote certainty of the cable system

¹¹ *Id.* Quintillion’s research reveals no case, for at least the past fifteen years, where the Commission has rejected a request by a submarine cable landing license applicant to operate its system on a non-common carrier basis.

¹² *National Association of Regulatory Utility Commissioners v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) (“*NARUC I*”), *cert. denied*, 425 U.S. 992 (1976).

¹³ *Submarine Cable Streamlining Order*, 16 FCC Rcd. 22167, 22202, ¶ 70 (2001). *See also National Association for Regulatory Utility Commissioners v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) (“*NARUC I*”), *cert. denied*, 425 U.S. 992 (1976).

¹⁴ *See Joint Application for a License to Land and Operate a Submarine Cable Network Between the United States and Japan, Cable Landing License*, 14 FCC Rcd. 13066, 13080, ¶ 38 (1999) (“*Japan-U.S. Cable Landing License*”); *Application for a License to Land and Operate in the United States a Private Submarine Fiber Optic Cable Extending Between the United States and the United Kingdom, Cable Landing License*, 12 FCC Rcd. 8516, 8520-23, ¶¶ 14-17 (1997) (“*Cable & Wireless Cable Landing License*”).

deployment.¹⁵ The Commission has found that the certainty that a cable system will be deployed as scheduled can outweigh any public interest benefits of “imposing additional burdensome regulation” associated with common carrier regulation.¹⁶ Rather, in those circumstances, relying on its authority under the Cable Landing License Act to ensure that operation of the cable network will protect the public interest, the Commission has concluded that the public interest would be served by allowing a submarine cable to be operated on a non-common carrier basis as proposed by the applicant.¹⁷

In evaluating the intentions of an applicant or licensee to offer capacity on the proposed cable on a non-common carrier basis, the Commission will consider alternatives to the cable system for communications.¹⁸ These alternatives need not be identical to those of the

¹⁵ See e.g., *Japan-U.S. Cable Landing License*, at 13080, ¶ 39; *Cable & Wireless Cable Landing License*, at 8522-23, ¶¶ 15-17.

¹⁶ See *Japan-U.S. Cable Landing License*, at 13080, ¶ 39 (“We also concluded, above, that any public interest benefits of imposing additional burdensome regulation in this case would be outweighed by the benefits of promoting the certainty that the Japan-US CN will be deployed as scheduled. In these circumstances, our authority under the Cable Landing License Act is sufficient to ensure that operation of the Japan-US CN will serve the public interest, and common carrier regulation is not necessary.”).

¹⁷ See *Japan-U.S. Cable Landing License*, 14 FCC Rcd. at 13080, n.56.

¹⁸ *Cable & Wireless Cable Landing License*, 12 FCC Rcd. at 8522, ¶¶ 14-16. The Commission found, for example, that competing non-common carrier facilities, as well as alternative means to the destination point can constrain the ability of a licensee to engage in anti-competitive practices, and thus satisfy the first prong of *NARUC I*. *Japan-U.S. Cable Landing License*, 14 FCC Rcd. at 13080, ¶ 39 (finding that the U.S.-Japan route is also served by a number of existing and planned fiber optic cable systems, as well as by satellite capacity); *China-U.S. Cable Landing License*, 13 FCC Rcd. 16232, 16236, ¶ 13 (1998). In the *Japan-U.S. Cable Landing License*, the Commission also noted that U.S.-Japan traffic can also be carried indirectly over alternative cable systems which connect Japan to the United Kingdom. *Japan-U.S. Cable Landing License*, 14 FCC Rcd. at 13080, n.56.

Applicant,¹⁹ and the Commission has stated it will consider both existing and planned alternative facilities when conducting a competitive analysis.²⁰

The importance of Quintillion's Subsea Cable System to augment the communications capabilities of the communities' hosting landing sites, and the presence of existing and planned facilities servicing the Quintillion System's landing points, protect the public interest. Accordingly, the public interest does not require that the Quintillion Subsea Cable System to be operated on a common carrier basis.

The Quintillion Subsea Cable System will provide much-needed additional transmission facilities in Northwest Alaska. In addition, the Quintillion Subsea Cable System will have synergies with a planned terrestrial fiber network connecting Prudhoe Bay to Fairbanks via the Dalton highway and use of existing fiber capacity between Fairbanks and Anchorage, Alaska where fiber connections exist to the Pacific Northwest. The Quintillion Subsea Cable System will complement the capabilities presented by existing and future facility builds. Currently there are alternative communication options available at each of the six (6) landing points on the Quintillion Subsea Cable System. In particular, each of the proposed cable landing sites currently is served by at least two, and sometimes more, of the following service platforms: mobile wireless, fixed wireless, digital subscriber line (DSL), and cable.²¹ Backhaul service is available in Alaska, on a wholesale basis via satellite and microwave facilities, from several carriers in the region.²² The Quintillion Subsea Cable System will augment and provide a

¹⁹ See, e.g., *AT&T Submarine Systems, Inc. Application for a License to Land and Operate a Digital Submarine Cable System Between St. Thomas and St. Croix in the U.S. Virgin Islands*, 11 FCC Rcd 6035, ¶ 44 (1996).

²⁰ See, e.g., *General Communication, Inc.*, 16 FCC Rcd 4314, 4315 ¶4 (2001).

²¹ See, e.g., *Connect Alaska* at www.Connectak.org (visited Nov. 6, 2015).

²² GCI and AT&T are among the providers of the satellite and microwave services in the region.

competitive alternative to these existing communications options, thereby providing both redundancy in communications paths and, potentially, downward pressure on service rates. Consequently, the Quintillion Subsea Cable System will increase the service options already available to those communities and expand the reach of existing fiber builds by enabling those terrestrial fibers to link to the points on the Quintillion Subsea Cable System. Accordingly, with regard to the first part of the *NARUC I* test, Quintillion submits that there are sufficient existing or planned facilities on the direct route, or indirectly on alternative routes, to prevent the Company from exercising market power in offering services to the public.

As acknowledged in the National Strategy for the Arctic Region, the opening of the Arctic waterways, due to changing climactic conditions, will provide several benefits to the people of the Arctic including stimulating resource development and national security requirements for Alaska, promoting the building of critical infrastructure to support Arctic security, and creating demand for direct, secure, low latency telecommunication routes between the U.S. and foreign points. Moreover, deployment of the Quintillion Subsea Cable System will benefit the public interest by providing additional transmission facilities – thereby providing route diversity to respond to increasing natural and manmade threats – and capacity for carriers and ISPs serving Alaskan businesses and communities. Additionally, the introduction of fiber optic cable technology will allow local, tribal, state and federal government agencies to deliver services more efficiently and effectively. The proposed landing sites will offer communications access to support local and national businesses, including Native Corporations, educational, health, and public utility facilities, and residential communities.

The benefits of the Quintillion System's high-speed transmission capacity will disseminate, through connecting carriers, to support a number of community societal benefits

that rely on high-speed transmission while stimulating better competition on product, price and service at the end-user customer level. For example, digital learning can improve education and job training in local communities while lowering the cost of delivery and new options for delivery will be able to enter the market. Tele-medicine solutions will enable remote diagnostic and specialist consultations and access to electronic health records for residents located far from medical facilities. Resource development industries, such as oil and gas mining, will be able to conduct real time monitoring and management of their facilities and improve their search and rescue capabilities. Local governments will benefit from efficient delivery of government services and businesses will be able to capitalize on business opportunities that are dependent on high-speed communications.

The general characteristics of the proposed landing points are summarized below reflecting the benefit that the Quintillion Subsea Cable System would bring to Northern and Northwestern Alaska. The proposed Quintillion Subsea Cable System will help businesses, educational, public health, and government facilities located in these communities to continue to grow and benefit the Alaskan people.

Prudhoe Bay: Prudhoe Bay remains the largest oil field in North America with a population of approximately 2,200 rotational workers. This population often expands to include several additional thousand transient workers supporting the Prudhoe Bay oil fields from construction to exploration. In 2013 several new housing facilities were constructed to support plans announced by Conoco Phillips, BP and ExxonMobil to expand exploration and production.

Barrow: Barrow, the furthest north city in the United States, is the headquarters of Arctic Slope Regional Corporation, the largest of the Alaska Native corporations and of Ukpeagvik Inupiat Corporation, an Alaska Native Village corporation. As the regional

transportation center, Barrow is the headquarters for the North Slope Borough government and serves the North Slope Borough's Arctic coastal villages with air service providing mail, cargo, and passenger services. The Samuel Simmonds Hospital serves residents throughout the North Slope Borough and Iḷisaḡvik College, the only accredited, Alaska Native controlled higher education institution, offers Associate Degrees and certificates in vocational, academic, and workforce development fields. The University of Alaska Fairbanks maintains a multi-million dollar research program in Barrow.

Wainwright: Wainwright is the third largest North Slope Borough village and has a population of 556. Olgoonik Corporation, Wainwright's Village Corporation, manages several businesses, such as a hotel, restaurant, general store and fuel station, providing employment opportunities and basic services. Public facilities include the health clinic, public safety office, fire station, teacher housing, and a vehicle maintenance facility. Wainwright has been the major staging location for oil and gas exploration operations in the Chukchi Sea.

Point Hope: Point Hope is the second largest North Slope Borough village. With a population of 674, it is reportedly the oldest continuously inhabited village on the North American continent with over 2,500 years of recorded history. Point Hope is targeted for offshore oil and gas exploration and development. The North Slope Borough provides electricity and a water treatment facility. Public facilities include a health clinic, city hall, public safety building, fire station, and senior citizen center. Point Hope's village corporation is Tikigaq Corporation, which runs the Native store and hotel.

Kotzebue: With a population of 3,200, Kotzebue is the largest city in, and headquarters for, the Northwest Arctic Borough. Kotzebue is the seat of NANA Regional Corporation, the third largest of the Alaska Native Regional Corporations, and of Kikiktagruk

Inupiat Corporation, an Alaska Native Village Corporation. The University of Alaska Fairbanks Chukchi Campus serves eleven communities in the Northwest Arctic Borough, and the Maniilaq Health Center is a state-of-the art medical facility providing care to residents of the Northwest Arctic Borough. The Maniilaq Association, the largest employer in Kotzebue, is a non-profit that provides health and social services to residents of Northwest Alaska. Kotzebue neighbors many active and proposed mineral development operations including Red Dog mine.

Nome: With a population of 3,600, Nome is headquarters for the Bering Straits Native Corporation, a Regional Alaska Native Corporation and for Sitnasuak Native Corporation, an Alaska Native Village Corporation. Nome is the regional transportation center for surrounding villages and contains two state-owned airports and a seaport, used by freight ships and cruise ships. The state and the federal government are investigating building a deep water port at Nome or nearby Port Clarence. A recent Army Corps of Engineers study suggests expanding the Port of Nome in order to improve infrastructure along Alaska's west and north coast.²³

Deep draft port construction could start in 2017 and could be completed by 2020, further highlighting the importance of Quintillion's Subsea Cable System being operational by the end of 2016. State and federal officials say that with increased vessel traffic there is a need for ramping up the Coast Guard's presence for safety and national sovereignty.²⁴ Key public

²³ See Bruce Sexauer P.E., U.S. Army Corps of Engineers, Alaska Deep-Draft Arctic Ports Navigation Feasibility Study, http://www.wtcak.org/PDF2014/A/III/Sexauer_Bruce_US_Corps_of_Engineers.pdf (last visited September 18, 2015).

²⁴ See, e.g., ADD Main Report, U.S. Army Corps of Engineers, Draft Integrated Feasibility Report, Draft Environmental Assessment (EA), and Draft Finding of No Significant Impact (FONSI): Alaska Deep-Draft Arctic Port System Study Alaska District, Pacific Ocean Division (February 2015), at 25, <http://www.poa.usace.army.mil/Library/ReportsandStudies/AlaskaRegionalPortsStudy.aspx>.

facilities include the Norton Sound Regional Hospital in Nome and the University of Alaska Fairbanks which partners with the College of Rural and Community Development (CRCDD) to offer workforce development, career and technical education and academic preparation for degree programs.

Once the Commission concludes that the public interest does not require the submarine cable facilities to be offered on a common carrier basis, the second part of the *NARUC I* test requires the Commission to consider whether there is reason to expect an indifferent holding out to the eligible user public. In reviewing the application for this part of the test the Commission generally relies on the Applicant's statement that it will make individualized decisions regarding whether and on what terms to provide service and that all people will not be served indifferently.²⁵ Quintillion's services will *not* be offered or provided indifferently to the public. Instead, decisions regarding with whom to negotiate, what services to offer, and the rates and terms at which the services will be provided will be based on individualized decisions and tailored arrangements, depending on the characteristics and needs of the prospective customer. Consequently, Quintillion does not intend to offer telecommunications capacity on the Quintillion Subsea Cable System on a common carrier basis.

7. Cable Ownership Information²⁶

Quintillion alone will own, control, and operate all portions of, and will have a 100% voting interest in, the Quintillion Subsea Cable System including, but not limited to, all

²⁵ See *Submarine Cable NPRM*, 15 FCC Rcd. 20789, 20817 (¶ 66). In the *Japan-U.S. Cable Landing License*, the Commission found that it is reasonable to conclude that competition will require parties selling capacity to make flexible offers and not to offer capacity indifferently, and concluded that there is no reason to expect an indifferent holding-out to the eligible user public. See *Japan-U.S. Cable Landing License*, 14 FCC Rcd. at 13081, ¶ 41.

²⁶ See 47 C.F.R. § 1.767(a)(7).

cable landing stations, all equipment, all wet plant, all dry plant, and each segment of the cable system, whether located in territory subject to the jurisdiction of the United States, U.S. territorial waters, or outside of the territory subject to U.S. jurisdiction. No other entity or individual will hold any direct voting or ownership interest in any portion of the Quintillion Subsea Cable System. See Section 8, *infra*, for a description of the direct and indirect voting and equity interests in the Company.

8. Corporate Control and Affiliate Information²⁷

Quintillion submits the following information specified in Sections 63.18(h) through (k) and Section 63.18(o) of the Commission's rules:

a. Certification Regarding Ownership, Citizenship, Principal Businesses, and Interlocking Directorates²⁸

i. Equity Ownership Interest²⁹

The Company is a direct and wholly-owned subsidiary of Quintillion Subsea Holdings, LLC, ("Quintillion Subsea Holdings") a Delaware limited liability company engaged in the business of operating as a holding company. Its principal address is 201 East 56th Avenue, Suite 300, Anchorage, AK 99518. Quintillion Subsea Holdings holds a 100% direct voting and equity interest in Quintillion. (Voting control of the Company is discussed in detail in subsection ii below.)

The following individuals or entities hold a ten percent (10%) or greater direct or indirect equity interest in Quintillion Subsea Holdings and, therefore, will hold a ten percent

²⁷ See 47 C.F.R. § 1.767(a)(8).

²⁸ See 47 C.F.R. §§ 1.767(a)(8), 63.18(h).

²⁹ Those persons and entities having a 10% or greater direct or indirect equity interest in Quintillion are shown in Attachment B.

(10%) or greater direct or indirect equity interest in the Company but do not have voting rights in the Company:

Cooper Investment Fund LLC (“Cooper Fund”), is a limited liability company formed under the laws of the State of Delaware. Its principal address is: 1633 Broadway, 18th Floor, New York, NY 10019. Cooper Fund holds investments in a diverse range of business sectors including engineering and construction, shipping and telecommunications. Cooper Fund holds a direct, ninety-five percent (95%) equity interest in Quintillion Subsea Holdings which is attributable to a one hundred percent (100%) indirect equity interest in Quintillion under the Commission’s attribution rules.

AI CIP Holdings LLC (“AI CIP”) is a limited liability company, formed under the laws of the State of Delaware, engaged in the business of operating as a holding company. Its principal address is: 1633 Broadway, 18th Floor, New York, NY 10019. AI CIP holds a ninety-eight percent (98%) direct equity interest in Cooper Fund which is attributable to a one hundred percent (100%) indirect equity interest in Quintillion under the Commission’s attribution rules. As discussed in subsection ii below, AI CIP’s investment in the Cooper Fund is purely passive and gives AI CIP no control over the management of the Cooper Fund or, indirectly, Quintillion Subsea Holdings or the Company.

AI International Investments LLC (“AI International”) is a limited liability company, formed under the laws of the State of Delaware, engaged in the business of operating as a holding company. Its principal address is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. AI International holds a one hundred percent (100%) direct equity interest in AI CIP which is attributable to a one hundred percent (100%) indirect equity interest in Quintillion under the Commission’s attribution rules.

Grantor Trust dated May 21, 2003 (“May 2003 Grantor Trust”) c/o GPTC LLC, (Trustee) is a revocable Trust created for the purposes of estate planning. Leonard Blavatnik funded, and is the Settlor and beneficiary of, the May 2003 Grantor Trust. The principal address of the May 2003 Grantor Trust is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. The May 2003 Grantor Trust holds a seventy percent (70%) direct equity interest in AI International which is attributable to a one hundred percent (100%) indirect equity interest in Quintillion under the Commission’s attribution rules. The Grantor Trust has indirect investments in the natural resource, chemicals, media, wireless communications, technology, E-commerce and real estate industries. The Grantor Trust has an investment in the wireless communications industry in Norway, Denmark, Sweden, Indonesia and the Philippines but otherwise has no investments in the telecommunications industry in the United States or elsewhere.

GPTC LLC (“GPTC”), Trustee of the May 2003 Grantor Trust, is a limited liability company formed under the laws of the state of State of Delaware. GPTC’s principal address is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. GPTC is wholly-owned by the Phoenix Charitable Trust of which Alex Blavatnik and Lincoln Benet are the trustees, as explained below. As trustee of the May 2003 Grantor Trust, GPTC controls a one hundred percent (100%) indirect equity interest in Quintillion under the Commission’s attribution rules.

CT/FT Holdings LLC (“CT/FT Holdings”) is a limited liability company, formed under the laws of the State of Delaware, engaged in the business of operating as a holding company. Its principal address is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. CT/FT Holdings holds a thirty percent (30%) direct equity interest in AI International which is attributable to a thirty percent (30%) indirect equity interest in Quintillion under the Commission’s attribution rules.

1999 Children's Holdings, LLC, ("1999 Children's Holdings") is a limited liability company, formed under the laws of the State of Delaware, engaged in the business of operating as a holding company. Its principal address is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. 1999 Children's Holdings holds a fifty percent (50%) direct equity interest in CT/FT Holdings which is attributable to a thirty percent (30%) indirect equity interest in Quintillion under the Commission's attribution rules.

The Leonard Blavatnik 1999 Children's Trust ("Blavatnik 1999 Children's Trust") c/o BPTC LLC, (Trustee) is an irrevocable Trust created for the purposes of estate planning. Leonard Blavatnik funded, and is the Settlor of, the Blavatnik 1999 Children's Trust. The principal address of the Blavatnik 1999 Children's Trust is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. BPTC LLC, the Trustee of the Blavatnik 1999 Children's Trust and a limited liability company, was formed under the laws of the State of Delaware. BPTC's principal address is: 1100 N. Market Street, Wilmington, DE 19890. Control of the Blavatnik 1999 Children's Trust is vested in BPTC. The beneficiaries of the Blavatnik 1999 Children's Trust are the children of Mr. Leonard Blavatnik and they are all United States citizens. The Blavatnik 1999 Children's Trust holds a one hundred percent (100%) direct equity interest in 1999 Children's Holdings which is attributable to a thirty percent (30%) indirect equity interest in Quintillion under the Commission's attribution rules. The Blavatnik 1999 Children's Trust has indirect investments in the in the natural resource, chemicals, media, wireless communications, technology, E-commerce and real estate industries. The Blavatnik 1999 Children's Trust has an investment in the wireless communications industry in Norway, Denmark, Sweden, Indonesia and the Philippines but otherwise has no investments in the telecommunications industry in the United States or elsewhere.

1998 Family Holdings, LLC, (“1998 Family Holdings”) is a limited liability company, formed under the laws of the State of Delaware, engaged in the business of operating as a holding company. Its principal address is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. 1998 Family Holdings holds a fifty percent (50%) direct equity interest in CT/FT Holdings which is attributable to a thirty percent (30%) indirect equity interest in Quintillion under the Commission’s attribution rules.

The Leonard Blavatnik 1998 Family Trust (“Blavatnik 1998 Family Trust”) c/o BPTC LLC, (Trustee) is an irrevocable Trust created for the purposes of estate planning. Leonard Blavatnik funded, and is the Settlor of, the Blavatnik 1998 Family Trust. The principal address of the Blavatnik 1998 Family Trust is 730 Fifth Avenue, 20th Floor, New York, New York 10019. BPTC, LLC is the trustee of the Blavatnik 1998 Family Trust and controls the trust. The beneficiaries of the Blavatnik 1998 Family Trust are the members of Mr. Leonard Blavatnik’s immediate family and are all United States citizens. The Blavatnik 1998 Family Trust holds a one hundred percent (100%) direct equity interest in 1998 Family Holdings which is attributable to a thirty percent (30%) indirect equity interest in Quintillion under the Commission’s attribution rules. The Blavatnik 1998 Family Trust has indirect investments in the in the natural resource, chemicals, media, wireless communications, technology, E-commerce and real estate industries. The Blavatnik 1998 Family Trust has an investment in the wireless communications industry in Norway, Denmark, Sweden, Indonesia and the Philippines but otherwise has no investments in the telecommunications industry in the United States or elsewhere.

BPTC LLC (“BPTC”) is a Trustee of both the Blavatnik 1998 Family Trust and the Blavatnik 1999 Children’s Trust. BPTC is a limited liability company formed under the laws

of the State of Delaware and its principal address is: 1100 N. Market Street, Wilmington, DE 19890. BPTC is wholly-owned by the Phoenix Charitable Trust and is managed by Alex Blavatnik and Lincoln Benet. As trustee of the Blavatnik 1998 Family Trust and the Blavatnik 1999 Children's Trust, BPTC controls a thirty percent (30%) indirect equity interest in Quintillion under the Commission's attribution rules.

The Phoenix Charitable Trust ("Phoenix Charitable Trust") is a trust formed under the Laws of Bermuda and has a principal address of 730 Fifth Avenue, 20th Floor, New York, New York 10019. The beneficiaries of the Phoenix Charitable Trust are charities in the United States, United Kingdom, Russia, and a smaller number of other countries such as Israel, Georgia, and Latvia. The trustees of the Phoenix Charitable Trust are Alex Blavatnik, a United States citizen, and Lincoln Benet, a citizen of both the United States and the United Kingdom. The Phoenix Charitable Trust wholly owns GPTC and, through GPTC, indirectly controls an attributable one hundred percent (100%) indirect equity interest in Quintillion under the Commission's attribution rules. The Phoenix Charitable Trust also holds a one hundred percent (100%) direct equity interest in BPTC which is attributable to a thirty percent (30%) indirect equity interest in Quintillion under the Commission's attribution rules. The work of the Phoenix Charitable Trust consists of a United States charity supporting various charitable causes around the world, including education, research, and the arts. The Phoenix Charitable Trust has indirect investments in the oil and gas industry. The Phoenix Charitable Trust has no investments in any telecommunications companies in the United States or elsewhere.

Leonard Blavatnik is an individual investor with a wide range of investment holdings. Mr. Blavatnik is a citizen of both the United States and the United Kingdom and his principal address is: 730 Fifth Avenue, 20th Floor, New York, New York 10019. Mr. Blavatnik

is the Settlor for the May 2003 Grantor Trust, the Blavatnik 1999 Children's Trust, Blavatnik 1998 Family Trust, and the Phoenix Charitable Trust.

ii. Voting Control³⁰

This section identifies where the effective direct and indirect voting control interests of 10% or more of Quintillion reside. Apart from Quintillion Subsea Holdings, Cooper Fund, and CIP Manager LLC ("CIP Manager") (and its Members), as discussed below, none of the other equity holders identified in Section I.8.i, *infra*, and in the Quintillion equity ownership chart is authorized to make any decisions regarding, or exercise voting or control over, the management and operations of Quintillion. None of these other entities or persons has the equivalent of 10% voting control, direct or indirect, in Quintillion Subsea Holdings or Quintillion.

Quintillion Subsea Holdings. All direct voting control over the management and operations of Quintillion is held and exercised by its parent company, Quintillion Subsea Holdings. Quintillion Subsea Holdings exercises that voting control through its Board of Managers ("QSH Board").

Cooper Fund. The majority of the QSH Board is appointed by Cooper Fund. A minority of the QSH Board is selected by election by the minority shareholders of Quintillion Subsea Holdings and none of those minority shareholders holds more than a 1.2% share of the Company.

CIP Manager LLC. The Cooper Fund's authority to select the majority of the QSH Board members has been vested in its manager, CIP Manager, which has a 2% direct equity

³⁰ Those persons and entities having a 10% or greater direct or indirect voting interest in Quintillion are shown in Attachment C.

ownership interest in Cooper Fund but has sole control over Cooper Fund's operations. Accordingly, CIP Manager has indirect voting control over Quintillion Subsea Holdings, and thus Quintillion, effectively equivalent to 100% under the Commission's attribution rules. CIP Manager is a Delaware limited liability company engaged in the business of providing portfolio management services for Cooper Fund. Its principal address is 1633 Broadway Suite 1802A, New York, New York, 10019. AI CIP, identified in subsection I.8.a.i, above, is a purely passive investor in Cooper Fund. It has no voting control in Cooper Fund and is limited to making decisions whether to purchase or sell shares in the portfolio companies of Cooper Fund, including Quintillion Subsea Holdings. The current QSH Board Members are Matthew Boyer, Adam Murphy, James DiMola, and Elizabeth Pierce. The first three Board members were those appointed by CIP Manager.

i) James DiMola is a United States citizen with a principal address is 1633 Broadway, Suite 1802A, New York, NY 10019.

ii) Elizabeth Pierce is a United States citizen and has a principal address of 201 East 56th Avenue, Suite 300, Anchorage, AK 99518.

iii) Matthew Boyer is an individual investor with a wide range of investment holdings. Mr. Boyer is a United States citizen and his principal address is 1633 Broadway, Suite 1802A, New York, NY 10019.

iv) Adam Murphy is an individual investor with a wide range of investment holdings. Mr. Murphy is a United States citizen and his principal address is 1633 Broadway, Suite 1802A, New York, NY 10019.

Members of CIP Manager: CL2 Holdings, LLC (“CL2 Holdings”), Matthew Boyer, Mitchell Taylor, and Adam Murphy. CIP Manager is held, directly, by its four Members, CL2 Holdings, LLC (“CL2 Holdings”), Matthew Boyer, Mitchell Taylor and Adam Murphy.

CL2 Holdings is a limited liability company, formed under the laws of the State of Delaware, engaged in the business of operating as a holding company. Its principal address is: 2711 Centerville Road Suite 400, Wilmington DE. CL2 Holdings is directly and wholly held by Stephen Cooper and Leonard LoBiondo. CL2 Holdings holds a seventy-four and sixty-seven tenths percent (74.67%) direct equity and voting interest in CIP Manager which is attributable to a 100% indirect voting interest in Quintillion under the Commission’s attribution rules.

Mr. Boyer, identified above, is a member of CIP Manager and holds an eleven and sixty-six tenths percent (11.66%) equity and voting interest in CIP Manager which is attributable to an 11.66% indirect voting interest in Quintillion under the Commission’s attribution rules.

Mitchell Taylor is an individual investor with a wide range of investment holdings. Mr. Taylor is a United States citizen and his principal address is: 700 Milam Street, Suite 1300, Houston, Texas 77002. Mr. Taylor is a member of CIP Manager and holds an eleven and sixty-six tenths percent (11.66%) equity and voting interest in CIP Manager which is attributable to an 11.66% indirect voting interest in Quintillion under the Commission’s attribution rules.

Mr. Murphy, identified above, is a member of CIP Manager and holds a two percent (2%) equity and voting interest in CIP Manager which is attributable to a 2% indirect voting interest in Quintillion under the Commission’s attribution rules.

Members of CL2 Holdings: Stephen Cooper and Leonard LoBiondo. There are two members of CL2 Holdings, and each has an indirect voting control share in the Company which exceeds 10%.

Stephen Cooper is an individual investor with a wide range of investment holdings. Mr. Cooper is a United States citizen and his principal address is: 1633 Broadway, 7th Floor New York, NY 10019. Mr. Cooper is a member of CL2 Holdings and holds a seventy-six and ninety-three tenths percent (76.93%) equity and voting interest in CL2 Holdings which is attributable to a 100% indirect voting interest in Quintillion under the Commission's attribution rules.

Leonard LoBiondo is an individual investor with a wide range of investment holdings. Mr. LoBiondo is a United States citizen and his principal address is: 78 Lake Drive Mountain Lakes, NJ 07046. Mr. LoBiondo is a member of CL2 Holdings and holds a twenty-three and seven tenths percent (23.07%) equity and voting interest in CL2 Holdings which is attributable to a 23.07% indirect voting interest in Quintillion under the Commission's attribution rules.

There is no other individual or entity, other than those identified in this Section I.8.a, that holds or controls a ten percent (10%) or greater direct or indirect voting or equity interest in Quintillion.

Quintillion has no interlocking directorates with foreign carriers.

b. Certification Regarding Foreign Carrier Status and Foreign Affiliation³¹

As evidenced by the signature of its authorized representative on the Certification to this Application, Quintillion certifies that it is not a foreign carrier. Quintillion certifies that it is affiliated, through common, indirect ownership, with AINMT (operating under the ice.net and Net1 brands), a provider of mobile telecommunications and/or broadband Internet access in Norway, Sweden, and Denmark and, through joint ventures, in the Philippines and Indonesia. Quintillion has no other foreign carrier affiliations.

c. Certification Regarding Provision of International Telecommunications Services to Destination Countries³²

Quintillion does not hold an authorization, pursuant to Section 214, to provide international telecommunications services and does not at this time seek to provide international telecommunications services to any destination country. Accordingly, and as further evidenced by the signature of Quintillion's representative to this Application, Quintillion certifies that it does not seek to provide international telecommunications services to any destination country for which any of the following are true: (i) Quintillion is a foreign carrier; (ii) Quintillion controls foreign carriers; (iii) an entity that owns more than 25 percent of Quintillion, or that controls Quintillion controls a foreign carrier; or (iv) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of Quintillion and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

³¹ See 47 C.F.R. §§ 1.767(a)(8)(ii).

³² See 47 C.F.R. §§ 1.767(a)(8)(iii).

d. Certification Regarding WTO Status, Market Power, and the Effective Competitive Opportunities Test³³

Not applicable as Quintillion does not intend, at this time, to provide international service or connect to foreign points.

e. Certification Regarding the Anti-Drug Abuse Act of 1988³⁴

As evidenced by the signature of its authorized representative on the Certification to this Application, Quintillion certifies pursuant to Sections 1.2001 through 1.2003 of the Commission's rules, 47 C.F.R. §§ 1.2001-1.2003, that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

f. Certification Regarding Routine Conditions Set Forth in Section 1.767(g) of the Commission's rules³⁵

As evidenced by the signature of its authorized representative on the Certification to this Application, Quintillion certifies that it accepts and will abide by the routine conditions specified in Section 1.767(g) of the Commission's rules.

g. Certification Regarding Service to U.S. Coordinator, Department of State; NTIA, and Defense Information Systems Agency³⁶

Pursuant to Section 1.767(j) of the Commission's rules, a complete copy of this Application has been sent to the U.S. Department of State, the U.S. Department of Commerce, and the Defense Information Systems Agency.³⁷ Service is certified on the Certificate of Service attached to this Application.

³³ See 47 C.F.R. §§ 1.767(a)(8)(iv).

³⁴ See 47 C.F.R. §§ 1.767(a)(8), 1.2001-1.2003, and 63.18(o).

³⁵ See 47 C.F.R. §§ 1.767(a)(9), (g).

³⁶ See 47 C.F.R. §§ 1.767(j).

³⁷ See 47 C.F.R. §§ 1.767(j).

III. REQUEST FOR STREAMLINED TREATMENT

Quintillion requests streamlined processing of the Application under Sections 1.767(j) and (k) of the Commission's rules, 47 C.F.R. §§ 1.767(j)-(k). The Quintillion Subsea Cable System for which authority is hereby sought will not touch any foreign destination.³⁸ Accordingly, pursuant to Section 1.767(k)(1) of the Commission's rules, Quintillion hereby certifies that it is not a foreign carrier and is not affiliated with foreign carriers in any of the cable's destination markets.³⁹ Pursuant to Section 1.767(k)(4), Quintillion certifies it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3) of the Coastal Zone Management Act ("CZMA"), 16 U.S.C. 1456. The Alaska Coastal Management program expired on July 1, 2011 and, consequently, the CZMA Federal consistency provision no longer applies in Alaska.⁴⁰

³⁸ As noted above, Quintillion anticipates that the system will in the future be expanded to several foreign destinations. At such time as Quintillion anticipates moving forward on that expansion, Quintillion will seek any additional authority from the Commission that is required.

³⁹ As noted in Section II.8.b. *supra*, Quintillion has certain foreign carrier affiliations, but it is not affiliated with a foreign carrier that operates in the Quintillion Subsea Cable System's destination market which comprises six landing points located wholly within the State of Alaska.

⁴⁰ See Alaska Coastal Management Program Withdrawal From the National Coastal Management Program Under the Coastal Zone Management Act (CZMA), 76 FR 39857 (July 7, 2011).

IV. CONCLUSION

The foregoing demonstrates that the public interest, convenience and necessity would be furthered by grant of this Application.

Respectfully submitted,

Quintillion Subsea Operations, LLC



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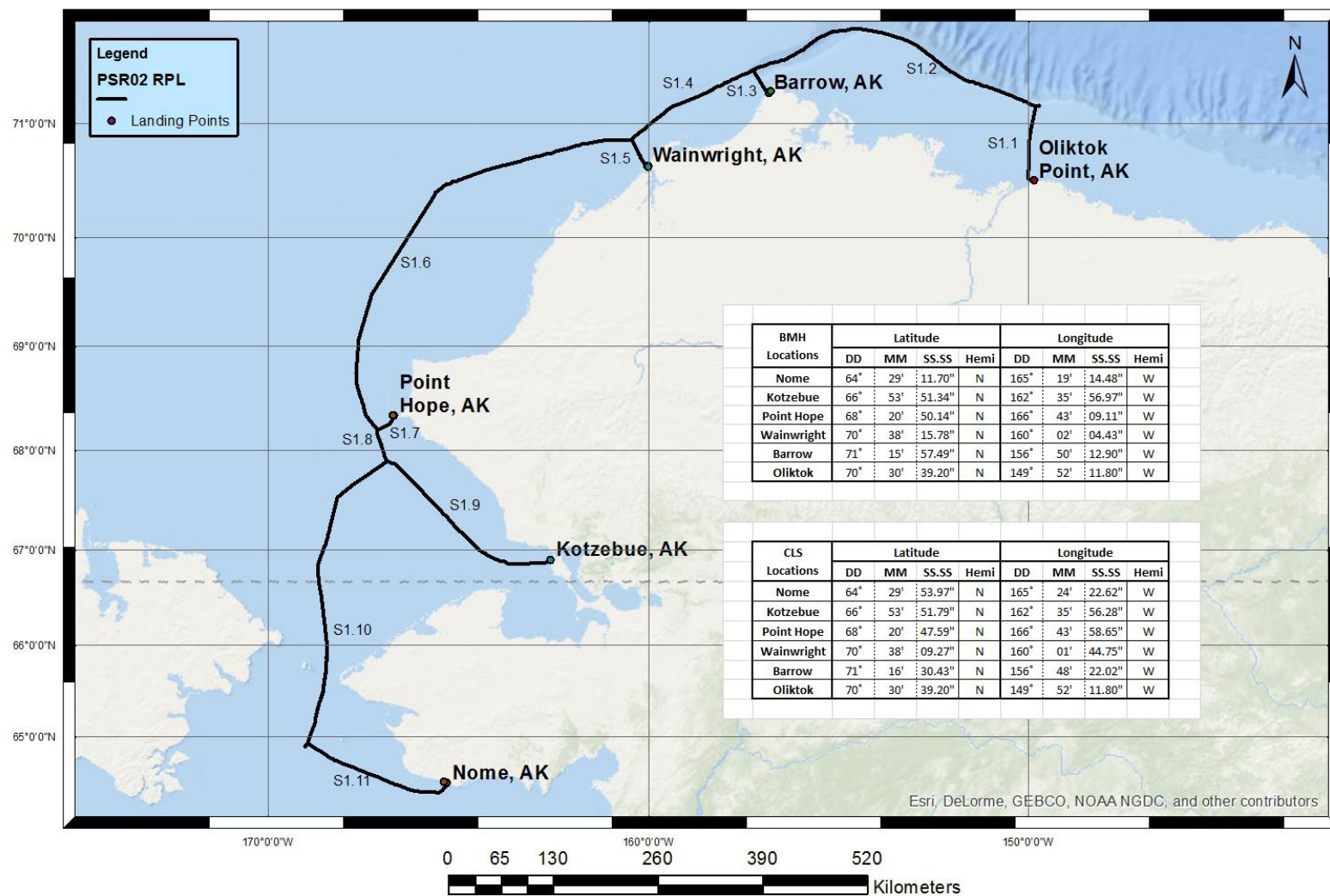
Its Attorneys

Dated: March 24, 2016

Attachment A

Map Showing Specific Geographic Coordinates

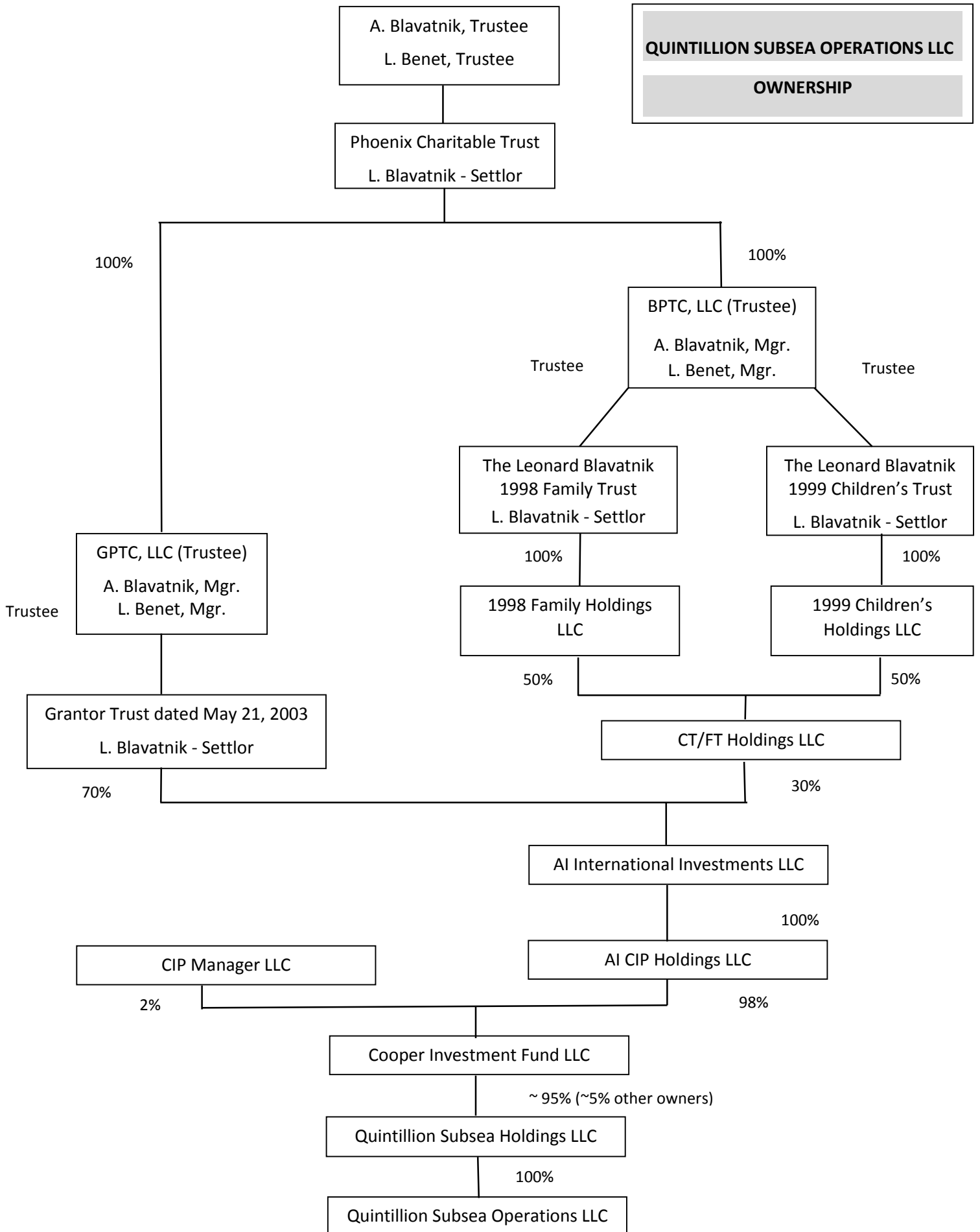
Quintillion Subsea - BMH/CLS Positions



Date: 1/14/2016

Attachment B

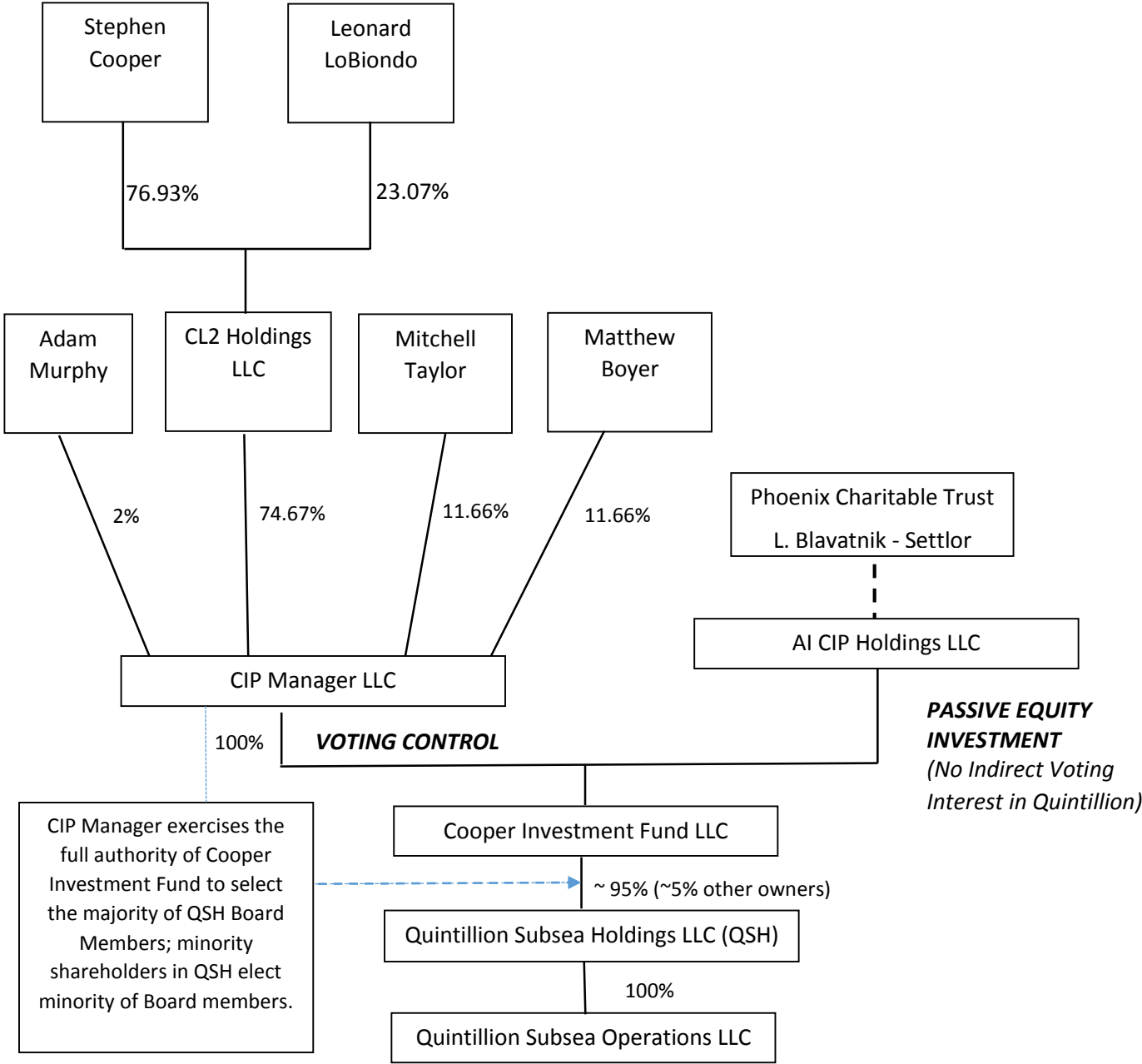
Equity Interest in Quintillion



Attachment C

Voting Interest in Quintillion

QUINTILLION SUBSEA OPERATIONS LLC
Voting Interests and Control



Certification

I, Elizabeth Pierce, state that I am Chief Executive Officer of Quintillion Subsea Holdings, LLC (“Quintillion”); that I am authorized to represent Quintillion and Quintillion Subsea Operations, LLC (jointly, “Quintillion”) and its subsidiaries, and to make this verification on their behalf; that the statements regarding Quintillion, its subsidiaries, and its affiliates and the certifications contained in the foregoing Federal Communications Commission Application for a License to Construct, Land and Operate a Private Fiber Optic Cable System Linking Points Within Alaska, and Request for Streamlined Treatment (the “Application”), except as otherwise specifically attributed, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

By:



Elizabeth Pierce
Chief Executive Officer
Quintillion Subsea Operations, LLC
201 East 56th Avenue
Suite 300
Anchorage, AK 99518
(907) 440-4511

For and on behalf of Quintillion Subsea Operations, LLC

Dated: March 24, 2016

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Quintillion Subsea Operations, LLC Application for a License to Construct, Land and Operate a Private Fiber Optic Cable System Linking Points Within Alaska, and Request for Streamlined Treatment was served by first-class mail on March 24, 2016.

Ambassador Daniel Sepulveda
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Bureau of Economic and Business Affairs
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