

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**WASHINGTON HARBOUR, SUITE 400**

**3050 K STREET, NW**

**WASHINGTON, D.C. 20007-5108**

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

EDWARD A. YORKGITIS, JR.

DIRECT LINE: (202) 342-8540

EMAIL: eyorkgitis@kelleydrye.com

April 8, 2016

**VIA IBFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20445

Re: In re: Application of Quintillion Subsea Operations, LLC for a License to Construct, Land and Operate a Private Fiber Optic Cable System Linking Points Within Alaska, and Request for Streamlined Treatment; SCL-LIC-20160325-00009 – **Supplement to Application**

Dear Ms. Dortch:

On March 25, 2016 Quintillion Subsea Operations, LLC (“Quintillion” or the “Company”), by its attorneys, submitted an 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”) to the Federal Communications Commission (“Commission”).<sup>1</sup> By e-mail dated April 5, 2016, the Commission’s International Bureau requested additional information regarding the submarine cable landing stations. Quintillion hereby responds to those requests.

**Request 1:** “Please state whether each of the six cable stations is existing or planned, and whether Quintillion owns and/or manages each cable landing station building.”

---

<sup>1</sup> On March 30, 2016, Quintillion submitted an Application for Special Temporary Authority to construct, land, and test the Company’s cable system during the pendency of the Commission’s review of Quintillion’s Application for a Submarine Cable license. The STA Application remains pending. See SCL-STA-20160330-00010. (Revised STA Application filed April 5, 2016).

Marlene H. Dortch  
April 8, 2016  
Page Two

**Response:** The Company's Application seeks authority to construct, land and operate a high capacity fiber optic cable system (the "Quintillion System"), with cable landing stations in Alaska only, at Prudhoe Bay, Barrow, Wainwright, Point Hope, Kotzebue and Nome.

New structures will be built to house the Company's cable landing station equipment (*i.e.*, the landing, terminal and terrestrial transmission facilities) at the Prudhoe Bay (specifically at Oliktok Point), Barrow, Wainwright and Point Hope locations. At Oliktok Point, Quintillion will own the building which will be located on land Quintillion will have rights to use and occupy pursuant to a sub-lease. Quintillion at the remaining three locations will have sole use of the buildings pursuant to a separate twenty-year lease from an Alaska based real estate developer at each location. Quintillion will manage each of those structures and, accordingly, will exclusively control access to these buildings

The Kotzebue and Nome cable landing stations will be collocated within existing Central Offices of, respectively, OTZ Telephone Cooperative and TelAlaska. Quintillion will neither own nor manage these buildings but, as explained below, the Company will have full and exclusive access to its equipment within these buildings. At the collocation facilities, Quintillion's equipment will be housed in a secure cage that only Quintillion authorized personnel will be able to access.

All of the Company's cable landing stations and equipment will be new and Quintillion will own, operate, and control all of the equipment at each of its cable landing stations. Certain operation of the landing stations may be performed under Quintillion's control through a third-party Network Operations Center (NOC) service agreement.

**Request 2:** "If Quintillion plans to lease space for its equipment in a cable landing station building that is owned by another entity, please describe the leasing/collocation arrangements for each building. That is, is there a separate lease for each building? Does Quintillion own, operate, and control the equipment (landing, terminal and terrestrial transmission facilities) that it plans to collocate in each building? Does Quintillion have full and exclusive access to the building and the space where it intends to collocate its equipment?"

**Response:** Quintillion will lease the buildings at Barrow, Point Hope and Wainwright from an Alaska based real estate developer (Arctic Holdings, a wholly owned subsidiary of Pfeffer Development Corporation). Quintillion will have exclusive access to and control and use of the buildings which will be secured and will be monitored by security alarm systems and video at the Quintillion System NOC at all times. Each property has a separate lease.

At Prudhoe Bay (Oliktok Point) Quintillion will own the building but the building will be located on land leased by ConocoPhillips from the State of Alaska. Quintillion will have full and exclusive access to and control and use of the building. The building will be secured

KELLEY DRYE & WARREN LLP

Marlene H. Dortch  
April 8, 2016  
Page Three

and will be monitored by security alarm systems and video at the Quintillion System NOC at all times. The land use agreement with ConocoPhillips is provided for in a Master Agreement with Alaska Communications and ConocoPhillips.

As noted above, the Company's Kotzebue and Nome cable landing stations will be located in leased spaces within Central Office buildings owned by OTZ Telephone Cooperative and TelAlaska, respectively. Quintillion has entered into separate leases for these two locations, and each lease provides that Quintillion will have full and exclusive access at all times to the secured cages/rooms where the cable landing station equipment will be collocated. Per the leases, only the Company will be able to access these cages/rooms. The cages/rooms housing the collocated equipment will be secured by door locks and will be monitored by security alarm systems and video by the Quintillion System NOC at all times.

The Company hereby confirms that it will own and will have full and exclusive access to, and complete control over the management and operation of, its cable landing station equipment.

Please direct any questions regarding this submission to the undersigned.

Respectfully Submitted,



Edward A. Yorkgitis, Jr.  
Denise N. Smith

*Counsel to Quintillion Subsea Operations, LLC*

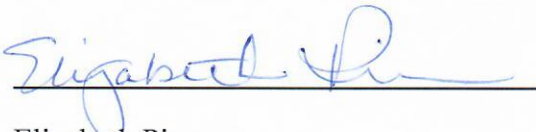
cc: David Krech, International Bureau (via e-mail)  
Jodi Cooper, International Bureau (via e-mail)

**Verification**

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 Supplement to the 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: April 8<sup>th</sup>, 2016

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Quintillion Subsea Operations, LLC Supplement to the 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, was served by first-class mail on April 8, 2016.

Ambassador Daniel Sepulveda  
U.S. Coordinator and Deputy Assistant Secretary of State  
Office of Int'l Communications & Information Policy  
Bureau of Economic and Business Affairs  
U.S. Department of State  
2201 C Street, N.W.  
Room 4634  
Washington, D.C. 20520-4634

Kathy Smith  
Office of Chief Counsel/NTIA  
U.S. Department of Commerce  
14th St., NW and Constitution Ave., NW  
Room 4713  
Washington, D.C. 20230

Robert Gorman  
General Counsel  
Defense Information Systems Agency  
6910 Cooper Avenue  
Fort Meade, Maryland 20755



---

Denise N. Smith